**Local Plan Partial Update Consultation :A response from members of Chew Valley Area Forum Climate & Nature Emergency Working Group**

**Context**

We are a working Group of the Chew Valley Area Forum which has been running for 12 months. We are made up of members from the following 12 Parishes in the Chew Valley & surrounding areas: Chew Magna, Chew Stoke, Compton Dando, Compton Martin, Clutton, East Harptree, Hinton Blewett, Publow & Pensford, Stanton Drew, Sutton Stowey, Ubley, West Harptree. Our members include Parish Councillors, members of Parish Climate & Nature Emergency working Groups and other individuals interested to work on our key goal of reducing the carbon footprint of the Chew Valley.

We have been working on this challenging brief within 4 topic sub-groups: Home Energy, Nature Protection, Renewable Energy & Sustainable Transport so our responses have been written by each subgroup and are combined here.

These responses do not necessarily reflect the views of Parish Councils in this area (though they may do, where members of the Parish Council are present in the group) as there has been insufficient time to consult with each Parish in this way, however, they do come from the considered thoughts of individuals who have been thinking about these issues in a focus way over the last year.

**Practicalities of making a response**

We have struggled to know how to respond to this consultation as the forms on the website are quite prescriptive and there is a mass of information to try to understand and respond to. We have done our best but perhaps one piece of feedback would be to try to make future consultations a bit more user friendly.

**General Overview Response**

We welcome these updates of the Local Plan to facilitate a quicker transition to carbon neutrality, and have already identified the lack of planning policy and guidance as one of the barriers to facilitating transition.

We are not, with any authority, able to comment on whether specific areas are ‘legally compliant’, ‘sound’, or ‘compliant with your duty of care’ but would like to make some more general comments which may be helpful, in particular, when thinking about the broader update of the spacial plan over the coming years.

We applaud the vision of a lower carbon footprint for B&NES and can see how the updates in the local plan will be significantly helpful to Parish Councillors in commenting on planning applications and on planners in their decision making, particularly in terms of new developments.

We note that by creating separate Supplementary Documents for specific areas there may be some development that provides contradictory advice. For instance lighting provisions for cycling and walking routes might impact dark skies initiatives. It would be helpful if the planning authority could offer advice on the appropriate resolution of these issues.

We note that much of the plan is concerned with, and angled towards the city and urban context, and feel, in terms of rural areas, such as the Chew Valley, a more radical envisioning of the future is needed, coupled with the financial backing to make this transition possible.

As a group we have carried out a cross Parish Survey about Sustainable Transport which shows how much infrastructure and resource is required to make it possible for individuals to make a shift to lower carbon methods of transport, and we would commend this to you for consideration as it has implications for planning (provision of electric charging points etc…) as well as other areas.

The proposed measures in total and across B&NES are helpful in moving toward net zero carbon by 2030. However "net" is the key and effort and it appears that resources will be directed to urban areas where the biggest carbon reduction can be achieved for money spent. This will result in rural areas being disadvantaged as we will not benefit from green initiatives. It therefore seems unlikely that the ideas put forward in the Supplementary Planning Documents will deliver carbon neutrality in rural areas by 2030.

Our main plea is to not forget the particular challenges facing rural communities, where stronger guidance in policy would assist local decision making.

Here are some further comments from our different subgroups:

**Home Energy:**

1. As a homeowner the SPG aims to support people in BANES to make homes more energy efficient, with less of an impact on the Climate Emergency. It provides useful guidance on adding improvements to existing buildings to make them more environmentally friendly.
2. The document starts with a The Quick Wins List offers cheap or free tips to help make your home more environmentally friendly. This includes wasting less energy, using less water and saving and recycling more water. All of this is useful.
3. The section gives a list of a wide range of retrofitting options to improve the energy efficiency of your home, plus sustainable construction guidelines. There is a useful and comprehensive list of retrofitting measures.
4. Under Summary table: Retrofitting measures and their impact provides a useful guide to indicative cost as low/medium/high is provided, together with the likely environmental impact and any consents that may be needed. This is extremely helpful.
5. The ‘Cut down unnecessary energy use’ with its series of quick, simple tips provided that will reduce your energy use, such as drying washing outside and not using a tumble dryer, install an energy meter so you can see exactly how much energy you are using and the simple action of wearing more layers inside the house when it is cold outside, rather than putting on the heating are all simple actions that most people will be able to do.
6. The Save and recycle water section shows simple ways to cut your water usage by re-using waste water (such as use water from a condensing tumble drier for washing the car, watering plants or cleaning.) seemed helpful for its simple descriptions of what to do from the tubed vent. Use a water butt and
7. The ‘Useful resources’ section is helpful if links remain up to date. Overall the list of options addressed is both extensive and comprehensive, making available practical advice that provides homeowners with a useful starting point when considering what to do to improve the energy efficiency of their home. It is suggested that readers visit these links and have a look at what advice is available to help decide what can be done in your home to reduce your energy use.
8. The withdrawal of the Green Homes Grant and its poor operation when it was in place, has seriously slowed the retrofitting of housing stock in our area. In our rural villages there are pockets of deprivation where increased insulation would make significant inroads in reducing poverty as well as reducing the carbon footprint of homes. However, local people may not be aware of what is available to them and need these policy changes, supportive grants and access to information to make the necessary changes. Changes in the planning framework may be one way that this information can be disseminated.
9. A balance needs to be struck between the need to protect the character of local areas in the Chew Valley with the pragmatic need to retrofit properties and make use of roofs for solar panels and a conversation about the importance of this shift in energy consumption needs to be begun in every parish, sparked by B&NES in its explanation of planning changes. We would commend the protection of heritage but also note that the essential character of buildings will not be protected if global warming is not halted: as one of our members noted ‘there is no use for heritage sites on a dead planet’.
10. We welcome the challenges set by the LPPU: Policy SCR6 calls for all new build housing to be designed to match projected total energy use with on-site renewably generated electricity (preference solar) - does this mean that sufficient solar panels / battery storage need to be fitted to meet average winter daily energy demand? Or is it on an annual generation average?
11. Overall we would say well done B&NES for this useful supportive document

**Nature Protection:**

1. We note that the Chew Valley includes valuable habitat and ANOB.
2. Farming and business operations working long hours or 24 hours in a rural context can have significant impact on dark skies and on the tranquility of these special areas, and the absence of planning protection *thus far* means that the *existing* situation is far from ideal. Permitted development changes argue from a poor initial baseline such as ‘it's only a few more lights on the land’ making it hard for parish councils to resist further losses to dark skies.
3. We note that ‘lighting must be designed to protect wildlife habitats following current best practice”. Our own view is that the council should consider the differing needs or impacts, in rural communities, which might consider the extent to which rural villages need street lighting. Many move to the countryside to enjoy dark skies and are frustrated that new development encroaches on this.
4. We note and welcome that ‘development resulting in significant harm to biodiversity’ will not be permitted. Guidance is needed to Parishes to help them understand the meaning of ‘significant harm’ in this regard.
5. There is some specific reference to 10% biodiversity net gain and multifunctional net gain in the update and we welcome this. We feel it is important to recognise that the law does not count replacement of habitats as equal to retention of existing habitats. In rural areas particular attention needs to be paid to existing biodiversity and the possible negative impact on overall green infrastructure such as permissive paths, wildlife corridors
6. Replacement of habitats is not a strong trade off against losing them. Thus adding in some trees or water courses as part of a development should not be seen as comparable to removing them initially. A greater emphasis on protection of existing biodiversity would be welcomed.
7. We welcome the intention to ‘to protect wildlife and habitats enabling residents to benefit from a green nature rich environment’ . We welcome the mention of ‘bat sustenance zones’ and ‘avoiding loss of hedgerows and woodland connectivity’ but believe Parishes need detailed guidance as to how this can be achieved.
8. The impact of development on any specific site is mentioned but each site developed will affect a wider geography so we believe this needs to be explicitly considered in any planning edits to protect the spatial impact.
9. We noticed in one of the documents (sustainability appraisal scoring), the score includes "well lit spaces" in its "design out crime" . However excess lighting is something to be avoided in rural areas if we want to encourage healthy wildlife habitats and dark skies. This lighting also uses power and high colour temperature which can have a far greater adverse effect on moth populations than low colour temperature ones.
10. The LPPU states “new building development damage is permanent ….” we note that in rural areas the impacts are likely to be greater given the impact on dark skies, nocturnal wildlife, the extent of hedgerows lost and the spatial impact of a development on the landscape

**Renewable Energy:**

1. As so little renewable energy has come forward in rural areas thus far local councils meet resistance within communities without a full understanding of its implications. There is concern that rural areas will be overwhelmed by development, but at the same time a keen interest in renewable energy use for community benefit is evident from others. Within our cross Parish group we are aware of 2 parishes who have progressed to having formal assessments of land for renewable energy schemes for the benefit of the community to be carried out, helped by the exploration of this working group. Proper education into the pros and cons of developments and their potential for community enhancement, and the facilitation of solar panels on housing and farming buildings has not been given sufficient consideration and support in our view.
2. We note that the Clutton renewable energy project has had success in wildflower growth around solar panels and in their proactive use of bat boxes and nesting boxes which have increased biodiversity from previously poor quality agricultural land. We would like to have more evidence of the pros and cons of solar panels and wind farms in terms of biodiversity loss and gain, and to understand more about good practice in this regard. Whilst we value to the webinars that have been offered thus far they have largely been ‘preaching to the converted’ and we would encourage the planning department going forward to support hybrid meetings (face to face and online) to help local people understand the potential positive and negative impacts of different developments and, in particular to see how permitting community benefit projects may be more advantageous than simply considering business approaches.
3. Ancient woodland, ancient trees and ancient hedgerows/grassland definitions are provided through Natural England within the glossary of the LPPU. This is helpful but more detail on mapping these in rural areas might demonstrate more effectively how to preserve these through the planning process.

**Sustainable Transport:**

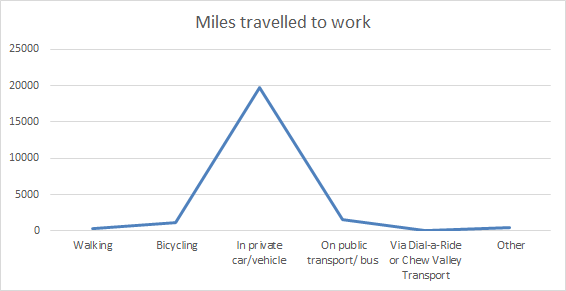
1. We note that the Supplementary Planning Document promotes a modal shift to public transport, low emissions vehicles and cycling and walking. Whilst infrastructural changes in cities can make significant inroads in this insufficient attention appears to have been given to the particular challenges of rural areas despite the fact that over 90% of the District’s land area is rural, with 47 rural parishes. – almost a third of the District lies within the Cotswolds and Mendip Hills AONBs and smaller settlements are located in the Chew Valley to the west of the District.
2. We note that the Chew Valley is recognised as a destination for leisure and recreation and whilst this is true we would see this as a city-centric view. The Chew Valley is also the place where rural communities live and work, and a place from which rural communities wish to connect to cities for work and leisure.
3. We welcome the council’s intention to embed the ‘principles of liveable neighbourhoods’ and would ask that this be considered as also relevant to rural areas. This may be particularly true when negotiating rush hour ‘rat runs’ through some of our villages and when seeking to encourage active travel on school runs. The lack of walking pathways, or sufficiently wide pavements in some villages are not easily remedied without changing the character of a village into a more urban environment, this means consideration of one way schemes, school run closures to allow walking lines and safer cycling need to be given serious consideration, as does the development of a network of off-road footpaths to enable children to walk to school and parishioners to walk to key local amenities (shop, pub, church) rather than driving. At present villages are as car-centric as at least in part because of inadequate public transport links.
4. The lack of rural bus service connectivity, and local roads that are too narrow, with poor sightlines and few pavements make it very difficult for people living in rural areas to move to lower carbon options and active travel. If there is to be a step change in *behaviour* there needs to be a step change *of provision*: in particular our ‘Have Your Say’ survey, carried out by this group, which engaged 410 households across the Chew Valley, shows that shuttle buses to link communities in the Chew Valley to each other and to main arterial routes, and separate joined up cycle routes with provision for bike parking by bus stops, could bring about a step change in behaviour.
5. In our view WECA needs to consider incentivising a switch to electric vehicle use. Our cross valley ‘Have Your Say’ survey showed that only 3% of the 410 households completing the survey were using electric vehicles at the present time and that people would want financial incentives to switch and the provision of rapid charging points in villages across the Valley. Part of what could be considered is the provision for infrastructure for retrofitting existing houses with electric charging: failure to retrofit existing properties is likely to discourage electric car uptake, particularly in rural areas where there are no local charging points available within a convenient radius (ie. not a ten mile walk from the house).
6. Many houses in the villages in the Chew Valley were built before cars (let alone before they were in common use) so they don’t have parking spaces attached to properties which would enable electric vehicle charging to happen at home. Many villages have small amounts of parking next to village halls or central spaces (by pubs, churches, schools, shops, playing fields or common land) that would lend itself to being community space for rapid charging points for electric vehicles and/or hubs for electric car clubs. This could also encourage more walking to school if they became drop off points for those coming to village schools from outside the village itself. However it is difficult for a Parish Council to make this happen and an injection of expertise and funding to help local people set up cooperatives to manage such initiatives across a rural area would be useful.
7. We note that parking space requirements on new dwellings are reduced. Whilst we can understand the logic of this (to nudge people towards active travel and public transport) the reality is that at present this provision is not in place (either for connected up public transport or for safe cycling and walking). It might make more sense if communities were encouraged to make use of centrally sited land for parking with electric vehicle charging points, for community vehicles or car share schemes.

**Some more specific points from the Supplementary Planning Document**

**Walking & Cycling**

Para 3.3.3 identified some “flagship strategic routes” these were all Bath centric.

Para 3.3.4 detailed some findings from the TravelWest Travel to Work Survey 2020 reported that 53% of respondents travelled to work by car. Within out Have your Say Survey this is a much larger % for the Chew Valley as this graph shows:



Para 3.3.5 stated that in rural areas 50% to 60% of pupil journeys to school were made by active travel. 6th form pupil travel to Chew Valley School is very much lower, with only 22% of those surveyed travelling to school by bus. This is a very different demographic trend to that found in urban areas or even in the parts of Somer Valley where there is more available public transport.

Para 3.4 Looks at issues and opportunities, but does not include “lack of provision” as an issue.

Para 3.7.12 Policy ST7 Policy D8 is concerned with planning safe routes and says “lighting should be provided in dark or unlit areas. While we must recognise that while safety for users is paramount it should be balanced with sympathetic consideration for habitats and dark skies.

Para 3.9.1 States “The promotion and delivery of quality cycling infrastructure is a key mechanism in enabling active travel growth. Reinforcement of this statement is provided within LTN 1/20, (Local Transport Note) which states that “we will need to see significant increases in cycling in our cities and towns, *and everywhere else*. To achieve that, the quality of cycling infrastructure must sharply improve, with the inclusion of properly-protected bike lanes, cycle-safe junctions and interventions for low traffic streets to encourage people to cycle.” This seems to be more city-centric, given the examples given and to achieve this in rural areas requires significant infrastructural change.

Para 3.9.3 acknowledges that much of B&NES is rural where there are varying speed limits and adds this as another thing to be considered by developers.

Para 3.9.8 with reference to LT1/20, states that modal interchange points for cycling to other forms of transport should have secure parking but it is not clear how this will be achieved in rural areas.

**Parking Standards**

Para 4.2.7 notes that “most rural areas are typically only served by relatively limited and infrequent public transport provisions.”

Section 4.5 Defines Parking Standard Zones. Rural areas are Zone D with the following characteristics, “small villages or scattered individual buildings. Very few local facilities are available within walking or cycling distance, and often no local facilities within walking distance. There is a high level of reliance on private car ownership. Motorised travel is therefore required for most journeys. Public transport services are infrequent or beyond reasonable walking distance. There is no shortage of land for parking provision, but the adjacent highway system offers limited

opportunities to park cars due to the highway conditions.” and these features are accepted as if nothing can change.

Section 4.3 Defines the Parking Policy Objectives as “ creating better places, supports Climate Emergency commitments by enabling low carbon mobility, improving health and wellbeing and reduces the impact of vehicle usage and storage on our built and natural environment, whilst helping to address inequalities in the district. However, it doesn't propose what planning infrastructure could support change.

Table 4.7 Shows that Chew Valley South has the equal highest level in B&NES of use of the private car as the predominant mode of transport. Chew Valley North is in the top 5.

Paras 4.7.3 to 4.7.10 defines Parking standards for Schools and School Streets. This would only impact on our area if a development of an existing school or a new school was constructed and there is no assistance to how existing streets could be improved if no development is planned (which is likely to be more common in Rural areas.

**Ultra-low emissions vehicles**

Para 5.3.2 States that provision of ULEV infrastructure must be seen in the context of wider objectives to reduce vehicle usage overall and is not intended to promote ULEV over other sustainable forms of transport such as walking, cycling or public transport. This would require improvements in public transport in the Chew Valley.

Para 5.6.6 States a minimum 7 kW active and passive provision for both residential and non-residential buildings is required. Some early home installations are 3.6 kW charge points, however, today the majority of the installations are 7 kW and expected increases in battery sizes and technology developments could make charge points less than 7 kW obsolete for future car models

Para 5.6.12 States that provision of ULEV infrastructure could put pressure on local supply capacities. However, unless the cost of providing the additional capacity is “prohibitively unreasonable additional cost for the development”.

Para 5.6.16 Supports the sharing of charging hubs between new developments which we would support.

Para 5.6.17 Recognises that electric car clubs provide an excellent accessible means to low emission transport, but goes on to state in Para 5.6.19 will be “generally located in urban or town centres”. We are uncertain how this conclusion has been reached

Para 5.6.21 States that ULEV charging infrastructure needs to be available at: Destination Parking, Residential Parking, Transit Locations, Workplaces, Taxi Ranks and Car Clubs. Clearly this is a huge shift to achieve in a rural area.

Para 5.6.32 States affordable homes will have to meet the same standards as other housing: we welcome this.

Para 5.9.3. States Non Residential Developments undergoing major changes will need to comply with ULEV Parking requirements. We welcome this.

**Travel Plan Guildance**

Para 6.1.2, States that Travel Plans will apply to all significant developments: we are uncertain how you judge significance in a rural setting where smaller size is likely but impact could be great on the tranquility of an area.

Para 6.7.1. states Travel Plans should define desired travel outcomes, and 6.7.2, states that there should be a costed action plan to show how those outcomes will be met. We welcome this.

Para 6.7.13. States that the Travel Plan should also consider legacy planning to allow for continuation by voluntary bodies or community bodies on completion of the plan which seems sensible.

Figure 6.2 on page 119 shows a flowchart for the Travel Plans process which we found useful.

As a group we would be happy to discuss any of these points further and/or to assist in disseminating to the Chew Valley any actions which are likely to support our aim of reducing the carbon footprint of the Chew Valley specifically and B&NES generally.

We hope it is helpful to have collected here some initial thoughts and reflections in response to the Local Plan Partial Update and would reiterate our main plea to not forget the particular challenges facing rural communities, where stronger guidance in policy would assist local decision making.

Compiled by Jackie Head

From Contributions from the subgroups of

Chew Valley Area Forum Climate & Nature Emergency Working Group