



MCLT response to South Gloucestershire Council Local Plan Phase 2 2022 Consultation

The Local Plan Phase 2 is available at; <https://beta.southglos.gov.uk/publications/local-plan-2020-phase-2-urban-rural-and-key-issues/>

If you wish to respond, the Consultation **ends April 4th 2022** and is available at: <https://consultations.southglos.gov.uk/connect.ti/LPP2/consultationHome>

You don't have to answer all the questions – just skip to those that interest you.

MCLT will be responding to the questions on sections:

- Creating sustainable rural villages and settlements
- Developing a strategy for renewable energy
- Phase 2 Planning Policies: Rural Exception Sites and Community Led Rural Housing

Creating sustainable rural villages and settlements and Planning Policies

South Gloucestershire Council (SGC) are currently engaged in developing a new Local Plan Phase 2 which is considering policies that 'sustain existing communities' over the next 20 years. SGC argue that 'our starting point is that we think each and every village and settlement has a role to play in contributing to sustainable growth in South Gloucestershire. We also think that the role those individual villages and settlements can potentially play should be appropriate and proportionate'.

MCLT's position is that some growth is needed to ensure Marshfield remains a vibrant and sustainable community. But it believes this growth should be :

- 'appropriate and proportionate' given the nature of Marshfield's location, character, and environment
- is rooted in genuine community engagement where power over decisions is made by those within the community.

In the draft new Local Plan SGC proposes 2 pathways for growth. **The pathway called Local Plan-Led growth** will classify villages into groups which will have an indicative growth range. This sort of development is what we already know as a traditional allocated site and the houses built will reflect what developers consider the best commercial mix of housing for that site.

SGC has not yet assigned individual villages/ settlements into categories or determined the villages/ settlements that may be potentially suitable for an appropriate allocation and is asking for comments on this approach in their Consultation. A village considered a 'large accessible village' could receive an allocation of growth up to 250 houses and one classed as an 'accessible village' a growth range 25-100.

MCLT will argue in its response that any allocation to Marshfield should be limited in recognition of the size, location, and structure of Marshfield. If it were to be classified, for example, as an accessible village it should receive an allocation towards the lower end of the growth range to recognise its isolation, its historic high street, its AONB location, its limited public transport with the attendant necessity for car use and its distance from some essential services. Its 'location, character and environment' would be undermined by disproportionate growth.

The other pathway is called Community Led Growth and any growth will be in addition to the Plan- led growth.

Rural Exception Sites (RES) come under this pathway. This is the route used by MCLT to identify and acquire a housing development site and achieve planning permission for affordable housing for local people with community approval and support.

The Local Plan also suggests adding a new 'Community Led Rural Housing' policy. While this

claims to address locally identified needs MCLT is opposing this because:

- this route allows for as many market homes as a traditional allocated site whereas the Rural Exception Sites policy limits market homes to only those needed to support the affordable homes;
- such schemes will not be in the hands of a community led group but in those of developers and there is no requirement that they should be community led;
- such developments can be outside the settlement boundary so could encourage uncontrolled development and an ad hoc approach to local planning;
- it would inflate land prices beyond the affordability of not-for-profit community led groups so reducing the possibility of a genuine community led group being able to secure any RES site.

MCLT intends to argue against this new policy but will advocate strengthening the existing RES policy used by not-for-profit community led groups such as CLTs rather than commercial developers. We will suggest to SGC that the RES policy needs to be amended so a wider range of locally identified needs can be met, such as first-time owner occupiers or self and custom build affordable homes, through a genuine community led housing development.

Summary of MCLT response to SGC Local Plan Phase 2 Creating sustainable villages

- Growth is necessary to maintain vibrant villages and ensure their sustainability but due to its 'location, character and environment' Marshfield should be allocated limited growth through the Plan-Led growth policy;
- MCLT argues strongly that the CLT model ensures that schemes to meet local needs can be brought forward through genuine community consultation and decision making;
- MCLT opposes the proposed Community Led Rural Housing Policy arguing it does not ensure that developments are genuinely community led. It should be rejected;
- The Rural Exception Site policy should be strengthened and made more flexible to meet a wider range of locally identified housing needs;
- Proposals through the RES should be allowed only where local community organisations have a genuinely democratic legal structure, e.g., a Community Land Trust constituted as a Social Benefit Society.

Developing a strategy for renewable energy

The MCLT scheme for renewable energy is in its early days and is exploring options with SGC on how it can work with MCLT to deliver locally generated renewable electricity. The consultation responses will therefore focus on collaboration and possible policy developments:

- suggest to SGC they might consider establishing some form of shared energy company which could manage the difference in the cost of generating and paying for renewable energy for the benefit of customers and communities;
- argue for action to address the major concern associated with the cost of grid connection and suggest to SGC that local authorities should seek a fundamental revision of the regulations applied by Ofgem to the National Grid. This is essential if communities are to cope with the increasing demands from electrification of transport and heating and the connection of distributed rural generators;
- argue that planning requirements for solar panels should be treated as is the case for polytunnels where little requirement for mitigation of visual impact is required;
- emphasise the costs of grid connection, and difficulties in managing the gap between production costs of energy and the retail price paid by the community and encourage SGC to support mechanisms to mitigate these concerns;
- encourage community involvement in energy generation and put in place opportunities for generators to earn a higher income so consumers benefit from lower costs such as Local Electricity Clubs and partnership working between LAs & Community Energy groups.