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16th July 2012

F.A.O. Mr Paul Crysell BSc MSc MRTPI
C/O Programme Officer
South Gloucestershire Council
PO Box 2081
South Gloucestershire
BS35 9BP

Dear Sir,

**RE: SOUTH GLOUCESTERSHIRE CORE STRATEGY EIP: FURTHER SESSION WEEK 4:
OPTIONS FOR TAKING THE CORE STRATEGY FORWARD.
ATHERTON FAMILY TRUST (4058049)**

I refer to the email from the Programme Officer sent out to all participants following the close of play on Friday confirming that you are holding a further session on Wednesday 18th July to consider: *“Options for taking the CS forward, assuming it is possible to address deficiencies in the Plan, whether by means of a further period of suspension, early review of the Plan or any other mechanism.”*

I am writing to you now on behalf of one of my clients (The Atherton Family Trust) to provide you with a very brief written note on our response to this matter.

Firstly, and to put this into a wider context (and matters the Council will no doubt be very mindful of itself), we are acutely aware of the scale of the likely delay and costs that would be incurred were the Council to withdraw the plan. We do not believe that such a radical course of action is necessary if the Council is prepared to undertake further work to ensure that:

- The overall level of housing provision is properly justified in accordance with the NPPF
- A proper and timely NPPF-compliant review of Green Belt is undertaken
- That in considering the allocation of sites and identification of ‘safeguarded land’ the Sustainability Appraisal does not discriminate against sites on the inner or outer edge of the Green Belt but considers just the relative sustainability of those sites: and
- That a proper and timely review of settlement boundaries is undertaken.

The above would enable the Council to focus on and come forward with a package of changes to address the specific areas in which the Plan might be judged to fall short with regards to its soundness. Indeed, we are aware that the approach taken by BANES in response to the Inspector's consideration of its CS would afford a valuable opportunity for the two Council's to seek to co-operate positively with each other and ideally with Bristol and North Somerset in reviewing Green Belt.

We do not consider that encouragement to the Council to undertake an early review represents an alternative that would be likely to achieve the desired outcome in anything like the timescale of the above, if at all.

Yours faithfully

Tim Roberts MRTPI
Director