

Our Ref: 10-005-P

Mr Paul Crysell
Planning Inspector
South Gloucestershire Council LDF
Council Offices
Badminton Road
Yate
BS37 5AF

19th July 2012

Dear Sir

Re: South Gloucestershire Core Strategy Examination: Policy CS12

You asked the Local Planning Authority to re-consider the wording of Policy CS12 following the hearing session. We highlighted our willingness to discuss this with the officers in order that we may be able to withdraw our objections to the soundness of the Core Strategy. The LPA has corresponded with us and has produced minor revisions to the policy and an explanation of the issues.

You are aware of our concerns outlined through representations and the hearing session. Unfortunately the latest iterations make superficial changes that do not address our concerns. As such the evidence we have presented remains unaddressed and we believe the plan remains unsound.

Without revisiting the evidence presented, I would like to make the following comments referring to the Council proposed changes to Policy CS12:

1. (Paragraph 2) I cannot find anything in NPPF which says that land specifically for B class uses should be safeguarded. NPPF's approach is much more widely related to enabling economic development as described in Annex 2 to NPPF.
2. (Paragraph 3) For the reasons already outlined, the balance between achieving the visions of the community and being flexible to business is still not achieved. The vision for the Billingtons site is set out in policy CS30, but Policy CS12 seeks to put further barriers in place of development.
3. (Paragraph 4) I cannot find anything in paragraph 17 of NPPF that supports the concept statement approach. The first bullet point of paragraph 17 talks about predictability and efficiency but the inconsistent approach between Policy CS30 and CS12 taken by the Council offers neither.

The proposed changes do little more than complicate the policy and the supporting text further reduces any kind of certainty that may be given to those wishing to promote economic growth of these sites because it places the decision on how sites come forward outside of a development plan led system.

We remain of the view that the wording previously suggested by Origin3 Ltd is more aligned with NPPF and continue to request that it be recommended for adoption by the Council.

Yours sincerely

Colin Danks
Director
(Colin@origin3.co.uk / 0117 9273 281)