

MATTER 3 / INITIAL CHAPTERS INCLUDING SPATIAL PORTRAIT, VISION  
& OBJECTIVES (19 JUNE 2012)

Representor No's 2827777 and 320641

Jill Kempshall on behalf of Marilyn Palmer

**MATTER 3 – SPATIAL PORTRAIT, ISSUES, VISION & OBJECTIVES**

Issue 1

Does the Spatial Portrait provide a reasonable snapshot of the area and the issues which face it?

**1. The Spatial Portrait is indeed a snapshot of the area, although the scale of current ongoing housing development is underplayed and there is a simplistic approach to the impact of multiple large developments on the urban fringe. It fails to acknowledge the effect of the symbiosis with the Bristol City Council urban areas, with shared transport systems and other infrastructure.**

**2. Given the intention to focus the bulk of proposed development on the North Fringe there should be a clear explanation of the implications for a coherent planning strategy of the complexities of the boundary with Bristol City Council administrative area post the demise of Avon County Council. There appears to be no government boundary review scheduled for the near future, although the appointment of an elected mayor in Bristol in 2012 may lead to a more concerted campaign for such a review within the lifetime of the South Gloucestershire CS.**

**3. We continue to be of the opinion that the proposed figure of 26,400 new homes which is first mentioned on page 10 of the Introduction is not a viable figure as projected from 2011. A sequential approach to determining the figure would be more "sound". (See also issue 8 below)**

Issue 2

Are the Strategic Objectives broadly consistent with the aspirations of organisations and the population and do they provide appropriate goals for the Council to pursue?

**1. The NPPF now contains a list of Core Planning Principles "which should underpin both plan-making and decision taking". Organisations such as CPRE consider it is now appropriate to include**

in the Strategic Objectives the Principles which are outlined in bullet points 7 and 8 of NPPF Paragraph 17, which encourage the use of brownfield land. Such an approach is essential if South Gloucestershire Council and developers are to deliver genuinely sustainable development. Paragraph 111 reiterates these Principles and suggests there is a case for locally set targets. A statement to this effect would thus be in conformity with the NPPF

2. A further clear indication of the Government's aim to prioritise use of previously developed land is contained in the DCLG publication of May 2012: Accelerating the Release of Surplus Public Land: Progress Report One Year On. Not only does this document recognise the importance of making such land available for development, including through the Community Right to Reclaim Land, but it also demonstrates how forecasts of available brownfield land or windfall sites can turn out to be underestimates in a short space of time – the Government estimates in mid 2011 that such land was available to build 100,000 homes by 2015 had grown to 102,430 by March 2012.

3. It is evident that there is strong support within the local population for the objective of preserving and enhancing the environment and for the retention of Green Belt boundaries. The NPPF recognition of the intrinsic value of the countryside reflects this concern. Local appreciation of the value of Green Belt land was evidenced in the Avon Key Facts section of the Natural England/CPRE Report on Green Belts, Green Belts: a Greener Future, January 2010. This supports the above argument for additional text to be included on brownfield sites in order to ensure the soundness of the Strategy.