

1. MATTER NO 15, QUESTION 1 –

IS POLICY CS9 SUFFICIENTLY COMPREHENSIVE IN SETTING OUT CRITERIA TO PROTECT THE NATURAL AND BUILT ENVIRONMENT?

- 1.1 It should be noted that Barratt Developments Ltd is represented by a number of participants to the South Gloucestershire Core Strategy EIP. In the context of the housing opportunity area at Thornbury (Park Farm), Pegasus Planning Group wish to make the following comments in relation to this matter:
- 1.2 Policy CS9 requires new development to:
- Ensure that sites, heritage assets and landscapes of archaeological, historical, ecological, arboricultural and geological importance are preserved, respected and where appropriate, enhanced.
- 1.3 The policy then continues to deal with flooding; the coastal environment; the use of natural resources; agricultural land; contaminated land; pollutants and unstable land, which are all related to the natural environment.
- 1.4 The policy in its current form does not provide detailed criteria in terms of assessing the impact of development on historical features, such as heritage assets, which could be interpreted as not providing sufficiently comprehensive criteria.
- 1.5 The policy is, however, considered sufficient enough to understand the Council's overall approach to historical features, which is to preserve, respect and where appropriate, enhance such features.
- 1.6 It is not considered that it is necessary to include a specific list of criteria on how development should not negatively affect heritage assets or the natural environment, as this is not required by the NPPF. The overall thrust of the policy is sufficient to provide developers and decision makers on how the policy should be applied, which is contained in the key words "preserved, respected and enhanced".
- 1.7 Detailed policies, in the form of CS32 and CS33 in relation to Thornbury, provide more detailed location and site specific criteria to protect the natural and built environment effected by the major development proposals.
- 1.8 In addition, as is the case in Thornbury, the Development Management process guided by NPPF will also ensure that the natural and built environment is protected.

2. QUESTION 2 –

IS THE COUNCIL'S APPROACH CONSISTENT WITH THE GUIDANCE IN THE PLANNING FRAMEWORK?

- 2.1 It should be noted that Barratt Developments Ltd is represented by a number of participants of the South Gloucestershire Core Strategy EIP. In the context of the housing opportunity area at Thornbury (Park Farm), Pegasus Planning Group wish to make the following comments in relation to this matter:
- 2.2 Paragraph 126 of the NPPF states that local planning authorities should set out a positive strategy for the conservation and enjoyment of the historic environment including heritage assets most at risk through neglect, decay or other threats. In doing so, they should seek to conserve heritage assets in a manner appropriate to their significance.
- 2.3 Local planning authorities should take into account that development might represent the optimal use and best means of securing a viable future for a heritage asset. The NPPF recognises that well considered development of a heritage asset can sustain and enhance its significance, increasing the economic, social and environmental benefits it can bring, and the contribution it makes to local character and distinctiveness.
- 2.4 In developing their strategy, Local Planning Authorities should therefore take into account:
- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
 - The desirability of new development making a positive contribution to local character and distinctiveness; and
 - Opportunities to draw on the contribution made by the historic environment to the character of a place.
- 2.5 By virtue of the wording of Policy CS9 (clause 1), the terms 'respect' and 'enhanced' effectively deals with bullet point 1 of para 126 of the Framework. For example,

development which respects heritage assets will sustain them, and by ‘enhancing’ them will ensure their long term existence in the future.

- 2.6 The fact that the Council’s draft policy CS9 is to ‘preserve, respect and where appropriate enhance’ heritage assets reflects the Council’s position that heritage assets can have wider, social, cultural, economic and environmental benefits (Planning Framework, para 126 bullet 2).
- 2.7 The requirement within Policy CS9 that development should enhance heritage assets, where appropriate, meets the requirement of the third bullet of para 126 of the Framework as this suggests that there should be a desire for new development to make a positive contribution to local character and distinctiveness through appropriate treatments to the heritage asset to ensure their longevity into the future.
- 2.8 The terms ‘enhanced’ in Policy CS9 also meets the requirements of the 4th bullet of para 126 of the Planning Framework as ‘enhancement’ can be interpreted as drawing on the contribution made by the historic environment to the character of a place, ie the features of heritage assets can be used to form the focus of a place/can contribute significantly to the character of a place.
- 2.9 Again, CS9 is supplemented and supported at the major settlements by settlement specific policies, such as CS32 for Thornbury, and the specific development locations are further protected by site-specific policies such as CS33 for Park Farm, Thornbury.
- 2.10 This policy further supports the Frameworks approach in areas where more extensive development is likely to occur.
- 2.11 The approach taken to the conservation of the historical environment at land at Park Farm, Thornbury will be discussed in detail by our further statement to Matter 27 (Thornbury).