

South Gloucestershire LDF

Consultation response in respect Core Strategy – Inspector’s
Further Main Modifications

In respect of

Land between Westerleigh Road, Drovers Way, railway
line, and Newman Close / Mill Crescent, Westerleigh

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South Gloucestershire Core Strategy

Public Consultation on Inspectors Further Main Modifications

We wish to make the following comments in relation to the Inspectors latest Further Main Modifications. Our comments also relate to the Councils Sustainability Appraisal Report made in the light of the Inspectors further comments, together with the Councils proposed Further Additional Modifications.

As a general comment we would like to stress from the outset that the whole Core Strategy / Local Development Framework process for South Gloucestershire has been an unbelievably complicated and drawn out process taking 6 years to reach even this stage and when finally adopted will result in a development plan for South Gloucestershire which potentially will have only 13 years to run and not the lifespan of 20 years as originally intended.

We are nevertheless saddled with this process and we submit yet again further comments in respect of our clients land at Westerleigh in particular, and more generally, to rural settlements within the Green Belt as part of the further proposed modifications.

The starting point regarding the Green Belt issues in our opinion is clearly set out in the Inspector's letter dated 10 September 2012 paragraph 8 under the heading Key Issues. The Inspector clearly stated his views in respect of the Green Belt as follows;

"I am unconvinced by the Council's approach to the Green Belt. I appreciate that there are parts of the District where alterations to boundaries would be inappropriate, but I consider the Council has not looked in sufficient detail at the Green Belt areas. As a result it has failed to seize the opportunity to adjust boundaries where the impact on Green Belt purpose would be limited. Previous planning policy guidance indicated that the plan making process was an appropriate vehicle for considering such changes and this remains the case following the introduction of the National Planning Policy Framework (NPPF)"

On the basis of the Inspectors views at that time various amendments were made to specific policies as contained in Appendix A of the Draft Main Modifications. Appendix B of that document sets out Policy CS5 which defines the key principles for the Location of Development. The major levels of development are focused on the urban fringe with the need to release significant tracts of green belt land. In respect of rural communities and settlements where only minimal development would be allowed, point 5 of CS5 states that in the rural areas, communities will be empowered to shape the future of their own local area through opportunities presented by Neighbourhood Planning. CS5 continues by stating that defined settlement boundaries will be maintained around rural settlements and reviewed in the Policies. Sites and Places DPD - which will include engagement with the local community and other stakeholders / parties. This in our view is dependent upon the weight the Council attaches to current and future Neighbourhood Plans produced by parish and town Councils which in our view is an extremely important aspect of the Localism Act giving neighbourhoods and communities a real say in how they wish to see their local area develop in the future.

We now turn to the Inspectors latest proposed Modifications and the Councils response following the reopening of the EIP on 7 March 2013 in respect land at Morton Way North,

Thornbury. The revised Further Main Modification have therefore sought to include the new allocation of land at Morton Way North in addition to Park Farm at Thornbury to revitalise the town centre of Thornbury under revised Policy CS5 and has in effect taken the pressure off the consideration of the needs of the rural areas to support their own communities.

This in our view has significantly reduced the previously stated opportunity for the consideration of the revision of green belt boundaries around the rural settlements as part of the need for a strategic green belt boundary for the whole district as advised in the Inspectors letter of 12 September 2012. It also in our view reduces the opportunity to consider such sites as part of a Neighbourhood Plan and therefore erodes the ability of parish councils to satisfactorily put forward options for future housing sites within their locality. This in our view could be seen as a deliberate attempt by South Gloucestershire to stifle any realistic debate of settlement and green belt boundary reviews around their settlements and villages contrary to the intended spirit of localism or what was intended as community participation under the Localism Act. We nevertheless concede that South Gloucestershire will still allow discussion of settlement boundaries within a future Policies Sites and Places DPD although this is not mentioned in the latest proposed modifications.

Indeed paragraph 6.8 of revised policy CS5 makes no mention of the ability of villages to influence the process by virtue of undertaken a Neighbourhood Plan which will shape the focus and future development issues in these settlements. We are surprised by the deletion of this reference as we contend that it is a fundamental right established under the Localism Act to empower local communities to shape the future of their settlements and villages by producing their own Neighbourhood Plans.

Whilst this is a fundamental right, a comprehensive Neighbourhood Plans need to be undertaken by communities as a pre cursor to the Councils future Policies Sites and Plans DPD which is one of the most important opportunities for communities to set out their detailed plans for their residents including future development opportunities and in certain cases the review of a settlement boundary where there is a proven need for new housing and / or employment provision where their sustainability credentials can be demonstrated.

Finally our comments are similar in relation to the councils Sustainability Report March 2013. In respect of development within the green belt and small scale development in non Green Belt areas. We contend that the new emphasis placed by the Inspectors allows very little opportunity to provide a comprehensive green belt boundary review and will therefore offer little if any real opportunity to review those green belt settlements which could offer the scope for limited housing development based upon accepted need and sustainability criteria. We contend that there are certain rural communities within the green belt including Westerleigh that could both benefit the wider village community and local economy should their green belt boundaries be capable of review. It would appear that the Inspector has significantly reduced the opportunity for communities to put forward such potential sites as part of the Parish / Neighbourhood Plan process, and thereby individual parishes being able to constructively influence the Council's forthcoming Policies, Sites and Places DPD in the future when this opportunity arises.

We trust the above comments will be forwarded to the Inspector