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South Gloucestershire Council
Strategic Planning Policy
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PO Box 2081
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Date: 9 April 2013

Our Ref: JAS/JA M6/0114-35

Your Ref:

By Post and Email:
planningLDF@southglos.gov.uk

Dear Sir or Madam

RE: SOUTH GLOUCESTERSHIRE CORE STRATEGY – FURTHER MAIN MODIFICATIONS - MARCH 2013

Mr Andrew Harvey of Harvey Shopfitters Limited, has instructed Tetlow King Planning to make representations on his behalf to the Inspector's Main Modifications to the Core Strategy consultation document. The focus of these representations is to amend draft planning policy to allow Harvey Shopfitters to operate effectively and efficiently without having to vacate the existing premises in Hanham.

We have previously set out in our representations that:

- Harvey Shopfitters is expanding rapidly but is unable to develop the site to meet this growth due to its designation within the Green Belt.
- The site is an anomaly within the Green Belt, which does not meet the tests for Green Belt designation within the NPPF.
- Mr Harvey may have to consider relocating the business. Given the lack of suitable sites in the area, this may have to be outside of South Gloucestershire.

We made representations to the consultation on the Main Modifications to the Core Strategy. For your reference, these are enclosed.

We do not support the proposed changes to Policy CS5. This focuses on precluding any further residential development in the Green Belt and does not make any provision for reviewing the Green Belt boundary for non-residential purposes. We have previously met with the Council and have been advised that the Green Belt boundary will be reviewed for smaller sites through the Policies, Sites and Places DPD. The proposed changes to the Core Strategy do not make any provision for this; they only allow for amending the Green Belt for large scale residential development at Harry Stoke.

The proposed policy is very clear that the Green Belt boundary will remain unchanged apart from this amendment. We do not consider that this is sound because it precludes smaller amendments to the Green Belt to allow economic development on the Eastern Fringe of Bristol to occur. We urge the Council to retain the Inspector's Draft Main Modifications (October 2012) which makes provision for the development in the Green Belt for:

"...The need for minor adjustments to address anomalies e.g. where the current boundary does not follow readily recognisable boundaries using physical features in accordance with government policy..." and "...it can be demonstrated that the purpose of retaining land in the Green Belt the need to release it for

other land uses and that such releases are consistent with the principles of securing sustainable development.” (page B2)

The changes to the Core Strategy proposed by the Council are not sound as they would frustrate the Council's other stated aims of rebalancing jobs and homes in the Eastern Fringe of Bristol. They would therefore not be sound as they not effective or justified.

These comments are intended to be constructive. Please inform us when the Inspector's Final Report is published.

Yours faithfully



JAMIE SULLIVAN
ASSOCIATE DIRECTOR
For and On Behalf Of
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Enc. M6/0114-32



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16 November 2012

JAS M6/0114-32

By Post and Email:

planningLDF@southglos.gov.uk

Dear Sir or Madam

RE: SOUTH GLOUCESTERSHIRE CORE STRATEGY - INSPECTOR'S DRAFT MAIN MODIFICATIONS - OCTOBER 2012

Our client, **Mr Andrew Harvey** of **Harvey Shopfitters Limited**, has instructed Tetlow King Planning to make representations on his behalf to the Inspector's Draft Main Modifications to the Core Strategy consultation document. The focus of these representations is to amend draft planning policy to allow Harvey Shopfitters to operate effectively and efficiently without having to leave the existing premises in Hanham.

We have previously set out in our representations that:

- Harvey Shopfitters is expanding rapidly but is unable to develop the site to meet this growth due to its designation within the Green Belt.
- The site is an anomaly within the Green Belt, which does not meet the tests for Green Belt designation within the NPPF.
- Mr Harvey may have to consider relocating the business. Given the lack of suitable sites in the area, this may have to be outside of South Gloucestershire.

I enclose a copy of our previous representations, which sets this out in more detail. Since these representations were made, the following changes to circumstances have occurred:

- Harvey Shopfitters has now grown to the limit that the existing buildings will allow, some jobs have to be outsourced and the site is operational seven days a week to cope with the increased number of contracts. With new contracts signed with McDonalds and Barclays Bank this year, expansion needs to happen immediately. Awaiting the Policies, Sites and Places DPD is not an option.
- The Hanham Neighbourhood Plan will not be a fully adoptable part of the development plan, so it will not be possible to release the site from the Green Belt through this option.
- An application on the former Kleeneze site in Hanham for retail redevelopment has been approved after the examination finished, leaving Harvey Shopfitters and Hanham Business Park as the only significant employment sites within the area. Hanham already had one of the lowest ratios of population to employment land, before this decision. I enclose a copy of our survey of remaining businesses in the area. This demonstrates that Harvey Shopfitters is the largest single employer in

Hanham and the importance of ensuring that the business remains at the site. The relocation of the company would therefore have significant detrimental effects on commuting patterns.

Our comments in relation to Main Modification 7 should be viewed in this context.

Main Modification 7 – Policy CS5

We acknowledge and support the Inspector's comments on the Council's approach to the Green Belt review, which we do not consider sufficient to meet development needs in the District. We will be seeking the removal of the Harvey Shopfitters site from the Green Belt through the Site, Policies and Places DPD. We are concerned that Harvey Shopfitters and employers at similar sites will find it very difficult to patiently wait for the Policies, Sites and Places DPD to be adopted before they can make an application to expand their business on Green Belt sites. The Council has indicated that it may take three years for this DPD to be adopted. However, given the likely controversy over the release of sites from the Green Belt it could be much longer.

Harvey Shopfitters is unable to wait for this amount of time in order to expand its premises and is already exploring opportunities with the Council to expand the company through the planning application process prior to Green Belt release. We are hopeful that a planning permission can be secured that will allow for expansion, but the current and emerging policy landscape will make this difficult.

You will also be aware that Tetlow King Planning represents Logersham Developments Ltd, (Comment ID 4144129) who is seeking to expand Hanham Business Park into the coal batch/slag heap that is within the Green Belt. Representations have been made to the Core Strategy throughout the consultation process to promote this site. The proposed modifications to Policy CS5 which address adjustments to Green Belt do not go far enough to ensure the delivery of employment generating development for sites such as these in the Green Belt. Their development is essential to match housing growth in areas where there is a considerable imbalance, such as at Hanham.

The issue of the imbalance between housing and employment land was raised as a key issue for the Core Strategy to address in the examination hearings. In addition, the NPPF has a considerable focus on promoting economic growth and the Ministerial Statement Planning for Growth in 2011 also encourages local authorities to bring forward proposals which will promote economic growth 'without delay'. We therefore consider that the development of schemes that can deliver additional employment and economic growth should not be delayed by the Policies, Sites and Places DPD.

A new point 5 within Policy CS5 should be added which, states that.

'5. In order to quickly rebalance the deficit of employment land to housing within the East Fringe of Bristol, applications for the development of employment sites which meet the criteria for release from the Green Belt in bullet 7 of this policy will be considered favourably in advance of their release through the Policies, Sites and Places DPD.'

We consider it appropriate to make these changes to the Main Modifications, based on the issues raised at the examination hearings; the comments raised by the Inspector in his Preliminary Comments; and the change in circumstances set out earlier in this letter.

Further Changes to the Proposed Main Modifications

In addition, proposed Policy CS5 is not appropriate for the release of employment sites through the Policies, Sites and Places DPD as currently drafted. The criteria for development sites to be released through the Policies, Sites and Places DPD is that 'Housing provision set out in Policy CS15 is

demonstrated as not capable as coming forward...' However, the policy is written as such that this would apply even to employment sites. This can be remedied by inserting the text as below:

*'a) Housing provision set out in Policy CS15 is demonstrated as not capable of coming forward taking account of any available contingencies and bringing sites forward from latter phasing periods **(in the case of housing sites)**; and'*

In addition, the proposed policy states that the exceptional circumstances for Green Belt release are set out in Criteria (a) (b) (c) and (d). This is not technically correct, as only two of the criteria need to be met, not all of them. The text should state:

*'Criteria (a) **and/or** (b) **or** (c) ~~and~~ **or** (d) provide the exceptional circumstances justifying non strategic amendments to the Green Belt.'*

These comments are intended to be constructive. Please inform us when the Inspector's Final Report is published.

Yours faithfully



JAMIE SULLIVAN
ASSOCIATE DIRECTOR
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Enc Hanham Business Study
M6/0114-26