

Duty to Co-Operate (DtC) – Schedule of Responses Received 9th May 2014

All councils preparing new local plans are required to comply with the duty to co-operate (DtC) to produce effective policies on strategic cross boundary matters. The aim of the DtC is to encourage constructive, positive and continuous partnership working that results in active and sustained engagement from the outset of the plan preparation on issues that may go beyond a single local planning authority's area. South Gloucestershire Council adopted its [Core Strategy](#) in December 2013 and the Council is now continuing with the preparation of its Policies, Sites and Places DPD Plan which will complete our up to date Local Plan. In accordance with the DtC, it is important at an early stage in its preparation neighbouring local authorities and other prescribed bodies have an opportunity to review and comment on the draft plan.

Between April and June 2014, emails were sent to local planning authorities and public bodies, including those set out in national planning guidance and the West of England Duty to Cooperate Schedule [West of England Duty to Co-operate Schedule](#). The purpose of this engagement was to share our initial work on the draft development management policies and the draft policy for Oldbury New Nuclear Build and to invite responses to the following questions relating to the DtC:

1. In relation to your authority/organisation, which policies do you consider that the DtC applies to?
2. Why do you think the DtC is engaged?
3. What measures do you consider this authority should take to discharge its DtC in respect of the policies you have identified?

The following local planning authorities and organisations were consulted:

Bristol City*, Bath and North East Somerset Council*, North Somerset Council*, Wiltshire Council, Somerset County Council*, Sedgemoor District Council, Mendip District Council, West Somerset District Council, Taunton Deane Borough Council, Gloucestershire County Council*, Gloucester City Council, Stroud District Council, Forest of Dean District Council, Monmouthshire County Council, Homes and Communities Agency, Environment Agency, English Heritage, Natural England*, Marine Management Organisation, South Gloucestershire Clinical Commissioning Group*, Civil Aviation Authority, West of England LEP, Office of the Rail Regulation, NHS Commissioning Board, Highways Agency, Coal Authority*, Avon Wildlife Trust, Sport England.

This schedule sets out the comments received from those organisations that replied to the council's invitation to make initial comments. It also presents the council's response. This work is part of the council's ongoing commitment to work constructively, actively and on an on-going basis with neighbouring local authorities and key stakeholders in the preparation and progression of the Policies, Sites and Places DPD Plan.

Organisation and Respondent	Summary of response points	Where each organistaion considers the DTC is relevant to	How this has been taken forward in preparation of draft PSP Plan
Richard Daone Bath and North East Somerset Council	Do not wish to make any comments		Noted.
Graham Quick North Somerset Council	<p>Emphasises the importance of continuing consultation and joint meetings.</p> <p>Specifically refers to PSP44 - Oldbury Power Station, where considers it will be imperative that the wider impact on housing, construction workforce and traffic need to be addressed through any pre application consultation. For example would wish measures to be introduced to ensure that the private housing market in North Somerset is not adversely affected and if it will be then compensatory measures are introduced.</p>	PSP44: Oldbury NNB	<p>Noted. Draft Policy PSP 44 and supporting SCC Report highlight these as key issues for Promoter to address.</p> <p>ONN DtC Liaison Group to be established and to act as forum for inputting into emerging PSP DPD/ inputting into reviewing DCO process.</p>
Rob Niblett Gloucestershire County Council	<p>Highlights that the following policies have the potential to impact on neighbouring authorities such as Gloucestershire:</p> <ul style="list-style-type: none"> • PSP11, PSP12, PSP13, PSP14, PSP15 (Transport). • Mineral policies – PSP 24, PSP 25 (Minerals) • PSP44 (Oldbury Power Station). <p>Emphasises that the very good consultation/liaison that has been carried out so far is maintained.</p>	<ul style="list-style-type: none"> • PSP11, PSP12, PSP13, PSP14, PSP15 (Transport). • Mineral policies – PSP 24, PSP 25 (Minerals) • PSP 44 (Oldbury Power Station). 	<p>Noted.</p> <p>Continue to maintain consultation / liaison. ONN DtC Liaison Group to be established and to act as forum for inputting into emerging PSP DPD/ inputting into reviewing DCO process</p>

<p>Paul Hickson Somerset County Council</p>	<p>Regards that the DtC applies to policy PSP44 - Oldbury Power Station, and any related policies on development associated with nuclear power generation.</p> <p>Emphasises that close links have already been established between South Gloucestershire Council and Somerset County Council and looks forward to further cooperation with South Gloucestershire Council, in particular regarding radioactive waste matters and the Oldbury proposal.</p>	<p>PSP44: Oldbury NNB</p>	<p>Noted. Draft Policy PSP 44 and supporting SCC Report highlight these as key issues for Promoter to address.</p> <p>Continue to maintain consultation / liaison. ONN DtC Liaison Group to be established and to act as forum for inputting into emerging PSP DPD/ inputting into reviewing DCO process. Continue to develop working relationship / shared experienced with SCC.</p>
<p>Nigel Roderick NHS South Gloucestershire Clinical Commissioning Group [CCG]</p>	<p>Considers that the DtC applies to PSP10 - Health Impact Assessments. Generally believes they are statutory consultees in any Infrastructure Planning Applications as set out in "The Infrastructure Planning (Prescribed Consultees and Interested Parties etc.) (Amendment) Regulations 2013". Wants to ensure that:</p> <ul style="list-style-type: none"> ▪ development proposals can support strong, vibrant and healthy communities and help create healthy living environments which should, where possible, include making physical activity easy to do and create places and spaces to meet to support community engagement and social capital; ▪ the plans promote health, social and cultural wellbeing and supports the reduction of health inequalities; ▪ the plans consider the local health and wellbeing strategy and other relevant health improvement strategies in the area; ▪ the healthcare infrastructure implications of any relevant proposed local development have been considered; 	<p>PSP10 Health Impact Assessment</p> <p>PSP44: Oldbury NNB</p>	<p>Noted.</p> <p>It is considered that reference to health issues is a cross-cutting issue and is therefore covered in many of the policies contained in the PSP Plan. Need to ensure CCG have a better understanding of how Planning contributes to good health. Public Health colleagues now acting in closer liaison role.</p>

	<ul style="list-style-type: none"> ▪ opportunities for healthy lifestyles have been considered (e.g. planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical activity, and promotes <u>access to healthier food</u>, high quality open spaces and opportunities for play, sport and recreation); ▪ potential pollution and other environmental hazards, which might lead to an adverse impact on human health, are accounted for in the consideration of new development proposals; and ▪ access to the whole community by all sections of the community, whether able-bodied or disabled, has been promoted. <p>States that PSP10 will in turn support the principles and related actions set out in the Health and Wellbeing Strategy.</p> <p>Considers South Glos. should provide opportunity to comment on any significant HIA. PSP 10 provides for the scope of each HIA to be agreed with the Local Planning and Public Health team within the Health and Wellbeing Division at the pre-application stage. We would be guided by the Director Of Public Health [who is a member of the CCG Governing Body] if there are any issues that we need to make specific comments as a CCG.</p> <p>States that in terms of PSP44 - Oldbury New Nuclear Build that in terms of any major incidents and preparations, the CCG is a category two responder, with NHS England taking the lead on behalf of all local NHS organisations in the area and region. There is therefore, a greater role for NHS England to comment on the Policy and have copied in the NHS England Emergency Preparedness, Resilience and Response [EPRR] lead into their response.</p> <p>Supports the following policies</p> <ul style="list-style-type: none"> ▪ PSP2 - Landscape ▪ PSP4 - Designated Local Green Spaces ▪ PSP5 - Undesignated Open Spaces within Urban Areas and Settlements ▪ PSP9 - Residential amenity ▪ PSP15 - Active Transport 		<p>ONN DtC Liaison Group to be established and to act as forum for inputting into emerging PSP DPD/ inputting into reviewing DCO process.</p>
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<p>Rachael A. Bust The Coal Authority</p>	<p>Points out that despite the strategic Core Strategy policies being adopted, issues associated with surface coal resources and coal mining legacy will still need to be afforded due consideration as part of the emerging Policies, Sites and Places Plan.</p> <p>Policy CS10 of the Core Strategy requires the Mineral Safeguarding Areas to be defined in the Policies, Sites and Places Plan.</p> <p>Policy PSP7 - Development in the Green Belt Welcomes the recognition in the policy that mineral extraction is appropriate development to take place within the Green Belt. Supports the recognition that working and restoration should be undertaken to high environmental standards.</p> <p>Policy PSP22 - Environmental Pollution Notes that the issue of unstable land is set out in Policy CS9 in the adopted Core Strategy, considers that it would be helpful to set out further policy criteria in a suitable development management policy. The proposed policy PSP22 may be a suitable 'home' for such policy criteria. Suggests detailed alternative wording to be incorporated into PSP22 – see LINK</p> <p>Policy PSP23 - Mineral Working and Restoration Supports the proposed policy wording with regard to restoration.</p> <p>Policy PSP24 - Mineral Safeguarding Areas Considers as presently worded appears confused and implies that the plan may be proposing not to safeguard all of the surface coal resource. If such an approach is pursued then would object to the soundness of the Plan as a</p>	<p>No specific comment made re application of DTC. However detailed policy wording suggested for policies PSP22, 24, 25.</p>	<p>Comments welcomed. Suggested changes to policies PSP22, 24 and 25 accepted and included in draft Plan published for public consultation. .</p>

	<p>whole. Suggests detailed alternative wording to be incorporated into PSP22 – see LINK</p> <p>Policy PSP25 Coal Bed Methane and Shale Gas - Suggests that this policy would be better titled ‘Conventional and Unconventional Hydrocarbons’ or ‘Hydrocarbon Extraction’. This is the terminology utilised in National Policy, will also need to illustrate the PEDL licence that covers part of the plan area to comply with the provisions of the NPPG. Suggests detailed alternative wording to be incorporated into PSP22 – see LINK</p>		
<p>Amanda Grundy Natural England</p>	<p>General Considers the draft policies to be generally positive, particularly with respect to the natural environment, including landscape, biodiversity and public access. Pleased to note that, where appropriate, biodiversity gain will be sought from development. Satisfied that the draft policies appear to be in accordance with the Core Strategy and welcomes the continuing emphasis on the importance of securing high quality, accessible development that enhances local character and distinctiveness.</p> <p>With respect to the Duty to Cooperate generally, Natural England considers collaborative working across local authority boundaries is essential to address environmental challenges such as climate change adaptation, water resource issues and the delivery of green infrastructure and ecological networks, which do not necessarily fit administrative boundaries. As you will be aware, Natural England has particular responsibilities for national and European designated sites and landscapes.</p> <p>We would expect the council to ensure neighbouring authorities and other interested parties are invited to comment on draft policies at the earliest opportunity and, if necessary, for more detailed discussions to take place, such as those the council is proposing for the new nuclear build at Oldbury.</p>	<p>Policy PSP2 – Landscape; Policy PSP19 – sites of special scientific interest; Policy PSP20 – wider biodiversity; Policy PSP21 - flood risk, water management and wastewater; Policy PSP26 - enterprise areas; Policy PSP44 – Oldbury new nuclear build (NNB); These policies appear to have implications for the natural environment beyond the South Gloucestershire administrative boundary that</p>	<p>Comments noted and agree. NE are key partner and continuing engagement is critical to achieving a sound Plan. NE to be fully consulted when Draft Plan published and ONN DtC Liaison Group to be established and to act as forum for inputting into emerging PSP DPD/ inputting into reviewing DCO process to which NE have been invited to contribute.</p>

	<p>Policy PSP19 – Sites of Special Scientific Interest (SSSIs) Broadly welcomes, suggests it might benefit from adding more local detail. Would welcome further clarification of the explanation for not having a policy for European Sites. European Sites are protected under the Habitat Regulations; however SSSIs are also afforded legal protection and recognised in NPPF. We would therefore encourage the Council to include a policy for European Sites.</p>	<p>would be benefit from a joined up approach with neighbouring authorities and will require input from statutory bodies such as Natural England.</p> <p>Considers European Site designations as they cover both SGC and BCC is a DtC matter. Would therefore like to see a policy introduced into the DPD covering European Site designations in addition to PSP19 (SSSI).</p>	<p>Comments noted however as these sites are given full protection by the European designation status (SPA/SAC/Ramsar) there in no requirement to repeat this. Any development with the potential to have a significant effect on the conservation objectives (i.e. features for which it is designated) of a European Site has to be subject to an appropriate assessment (HRA). If this concludes that a significant effect is likely the application has to be refused (unless it is of overriding public interest). It is therefore considered a</p>
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	<p>Enterprise Areas at Emerson's Green, Filton and Avonmouth/Sevenside Given the proximity of the Avonmouth/Sevenside area to the Severn Estuary European and national designated site and the complexity of the area, would welcome further refinement of this policy.</p> <p>Would also expect a more detailed policy framework for Emerson's Green and Filton could be beneficial to co-ordinate different phases of development and integrate green infrastructure at an early stage of design.</p> <p>Concerned with ensuring the interests of the Severn Estuary designated site are protected from the effects of further development in this area. Believes a positive policy framework for delivering the strategic mitigation to off-set effects of development is needed and that the PSP DPD could usefully provide further policy guidance about the requirements expected from proposed development, which should reflect the findings of the further studies and partnership discussions that are taking place. Such a policy could include guidance on the type/level of ecological evidence that would be needed to support a planning application and on the contribution that would</p>	<p>Considers the Enterprise Areas Policy is a DtC matter. Raises a number of issues in relation to ensuring status of Severn Estuary is fully recognised, importance of Green Infrastructure,</p>	<p>policy covering European Sites would not add anything over and above the legislative process which is stringent and robust. Moreover, as the sites and their respective designations are shown on the Policies Map these (constraints) are fully taken into consideration as part of any planning application.</p> <p>Comments noted. Policy is intended to provide a general overview of the role and function of the EAs and their key objectives. More detailed planning matters will be addressed through the emerging master plan and SPD forums.</p>
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	<p>be expected from new development to the delivery of ecological mitigation.</p> <p>POLICY PSP44 – Oldbury New Nuclear Build (NNB) Welcomes the council’s commitment to working in partnership and taking a collaborative approach. Generally supportive of the proposed policy wording and agree that developing the policy framework alongside the overall policy framework for the Council Area appears sensible.</p> <p>Notes that a draft vision will be set out in the consultation draft over the summer and would be pleased to comment on this in due course.</p> <p>Suggests that the wording in the key theme table for the Environmental Impact (archaeology & historic environment, landscape, ecology) would benefit from further clarification.</p> <p>Reference to the early production of a HRA is supported, but concerned by the reference to “appropriate compensatory habitat to the north of the site”. The use of the term ‘compensatory’ immediately following the reference to HRA could give an impression that these points are linked. Under the Habitat Regulations, compensation can only be acceptable after the Habitats Regulations Assessment process has been followed and, if necessary, imperative reasons of overriding public interest have been demonstrated; we therefore suggest that the two points are clearly separated to avoid misunderstandings about the planning status of the NNB. In addition considers that although land to the north of the site may be needed for mitigation/compensation reasons, following the regular assessment processes, including EIA and HRA, other land areas may be found to be more appropriate in terms of addressing impacts on particular species or designated site features. Suggests the policy would benefit by acknowledging that additional and/or alternative land may be needed outside the land to the</p>	<p>Considers the ONN Policy is a DtC matter. Highlights reference to text following reference to HRA as needing reviewing to ensure policy is clear and applies the HRA requirements appropriately. Suggests alternative words.</p>	<p>Comments noted. A specific question is asked as part of the public consultation re the Oldbury Policy. As NE have indicated intention to comment on the draft policy over the summer SGC will await these comments. Following feedback to the public consultation this will be further considered along with other comments received.</p> <p>Comments welcomed. Wording changed to: <i>‘Offset any loss at the site, together with appropriate compensatory habitat to the north of the site including any additional or alternative land that may be needed’</i> which is considered to address the helpful point made by NE.</p>
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	<p>north of the site. Refers officers to the Nuclear Policy Statement (NPS) C.6.151 Conclusion on the nominated site at Oldbury where it identified Oldbury as a <i>potential</i> site for a new nuclear power station, following a strategic/high level HRA.</p> <p>POLICY PSP29 With respect to Policy PSP29, can confirm that NE would not anticipate significant adverse effects to result from its implementation on any national, European or internationally designated sites or landscapes.</p>	<p>Natural England has no specific comments to make regarding Policy PSP29.</p>	<p>Comments noted and welcomed</p>
<p>Sarah O’Driscoll Bristol City Council</p>	<p>Policy PSP12 – Safeguarding Strategic Transport Schemes and Infrastructure Request details of the proposed safeguarding of any routes with cross boundary implications if these are available at this stage.</p> <p>Requests clarification of what is meant by the strategic public transport link from Henbury line to Cribbs Causeway referred to in the policy</p>	<p>Considers PSP12 Safe guarding strategic transport schemes is a DtC matter as routes have cross boundary implications</p>	<p>Comments noted. Detailed maps are not available at this stage, but will ensure this matter is reviewed once this is available. Figures on pages 30 and 31 of the draft PSP Plan indicates current level of detail.</p> <p>This refers to the provision of a high quality public transport service connecting the proposed railway stations on the Henbury Line with the Mall at Cribbs Causeway. The precise nature of this service is not yet determined.</p>

	<p>Policy PSP26 – Enterprise Areas The segment of Filton Enterprise Area within Bristol includes the historic Airbus offices and the Brabazon hangar within Filton Airfield. Thus BCC shares with SGC a strong interest to sustain prosperity and jobs in the Bristol aerospace industry and its supply chain. -.</p> <p>Severnside (with Avonmouth in Bristol) –suggest amend to a ‘industrial and warehousing area focused on ...’, and insert energy and environmental technologies –</p> <p>Page 2, para 4: Enterprise Zone at TempleQuarter: amend to ‘focus on creative and digital and low carbon technologies, and financial and professional services’ SGC officer response: text amended to include references as suggested. Does the TQEZ sector scope focus really include Low Carbon Technologies?</p>	<p>Considers PSP26 Enterprise Areas is a DtC matter as two of the Enterprise Areas (Filton and Severnside) adjoin and are partly within Bristol.</p>	<p>Comments noted and welcomed. As a point of clarification/ factual accuracy the ‘historic Airbus buildings’ are not within the Bristol part of the EZ just the Brabazon Hanger.</p> <p>Comments welcomed. Text amended to include references as suggested and incorporated into draft PSP Plan.</p> <p>Comments welcomed. Text amended to include references as suggested and incorporated into draft PSP Plan. However as TQEZ does not officially have a ‘focus’ on Low Carbon Technologies (some of the big firms like Burgess Salmon have a specialist</p>
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	<p>Page 2, final para: There is no reference here to any positive strategy or policies to drive a (more) sustainable model of economic development and infrastructure, or mitigation of / adaptation to the impacts of climate change, which is already identified as a significant issue for development of Avonmouth Severnside and Filton EAs, where improvements to flood defences and urban drainage and provision of ‘eco-mitigation’ sites in relation to loss or damage to habitats are either on-going infrastructure projects (ASEA) or under discussion in relation to the SPD and planning applications (Filton). Suggest insertion of a point 5 ‘Encouraging and upholding a high quality, resilient, environmentally sustainable, and inclusive model of economic development’</p> <p>Page 3 – Bold Text with Policies 1-5 Development Proposals will be supported where they will:</p> <p>– suggest add at 3) ‘and towards enabling communities and local businesses to access jobs and supply opportunities’. BCC recommends that planning conditions should be inserted in planning permissions, wherever possible, to ensure that developers both take a strategic approach to, and set out how they will provide or support mechanisms for local recruitment and training and engagement with local suppliers. We have a successful track record of doing this in BCC, and happy to assist SGC with models and templates which could be used to do this.</p>		<p>consultancy role in Env Tech & that BCC have a focus on green energy at TQEZ.) agreed with BCC EDO LC Tech is not recognised as a specific focus it is not included.</p> <p>Comments welcomed. Text amended to include references as suggested and incorporated into draft PSP Plan.</p> <p>Comments welcomed. Text amended to include references as suggested and incorporated into draft PSP Plan. This matter has been referred to our EDO officer for further consideration.</p>
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	<p>add at 6) or earlier: ‘make appropriate provision towards the sustainability of sites, the wider Enterprise Area and surrounding communities – eg. public transport services and travel plans, renewable energy and district heating, sustainable urban drainage, waste minimisation and energy efficiency etc.’</p> <p>Notes have our joint ongoing work on infrastructure requirements to unlock elements of the Avonmouth / Severnside area and further discussion on how this is reflected in the PSP will be required as this as the work progresses.</p> <p>Consultation Questions: Further refinement of the policy is not necessary or desirable, as the above principles should guide and apply to all 3 EAs equally and not be prioritised for one area above another.</p> <p>Policy PSP29 – Town Centre Uses Concerned about parts of draft Policy PSP29 because its implementation could have implications for centres within Bristol. Sub-paragraph 3 should reflect NPPF paragraph 23 by referring to impact of the proposal on existing, committed and planned public and private investment.</p>	<p>Considers PSP29 Town Centre Uses is a DtC matter because its implementation could have implications for centres within Bristol</p>	<p>Comments welcomed. Text amended to include references as suggested and incorporated into draft PSP Plan.</p> <p>Comments noted and fully agree.</p> <p>Comments welcomed</p> <p>Comments welcomed. For clarification, the NPPF reference to the impact on investment, is in paragraph 26 not 23, and relates to impact assessments. Core Strategy paragraph 29 sets the floorspace threshold when impact assessments are applicable. Point acknowledged and a reference to paragraph</p>
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	<p>Sub-paragraph 4 is not consistent with the NPPF which does not refer to developments performing roles which can't be accommodated in centres. Also concerned it is inconsistent with the NPPF's aims to set out criteria for development in out of centre locations when the NPPF does not promote development in such locations.</p> <p>Considers the purpose of the table accompanying the policy is unclear and could unduly restrict or cap the potential for development proposals to come forward within, on the edge of, or in accessible locations well connected to existing centres.</p> <p>The last sentence of the draft policy (following the table) does not accurately reflect Core Strategy paragraph 9.26 which refers to additional retail floorspace in out-of-centre locations and makes no mention of residual or unallocated floorspace.</p> <p>Paragraph 9.26 also refers to a review of the scope for permitting some additional development at Cribbs Causeway - no mention of this review is</p>		<p>29 is added to sub – paragraphs 3 and 4 of the draft PSP Plan.</p> <p>Acknowledge 4) is inconsistent with the NPPF and has been amended accordingly in the draft PSP Plan.</p> <p>The title of the table refers to assumed potential. The inclusion of the table in the Draft Plan, is to allow comments to come forward on this potential. The council has also undertaken independent advice which has been published to support the draft Plan and is available on our website.</p> <p>Comments noted. Policy has been amended in draft PSP Plan.</p> <p>DPD Plan relates to the detailed implementation</p>
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	<p>made in the Policies, Sites and Places Plan informal consultation. Requests confirmation that the Council does not intend to undertake this review as part of the preparation of the Policies, Site and Places Plan. I am aware of the Core Strategy Inspector's comments regarding the timing of any such work.</p> <p>Policy PSP44 – Oldbury New Nuclear Build (NNB) Bristol City Council will be pleased to work with South Gloucestershire and other adjoining authorities and key stakeholders to develop the key asks of the Nuclear Power developer/operator. It is anticipated that 'Asks', with specific reference to employment opportunities and employment skills and training; transport movement implications for construction materials and staff; ecological mitigation implications of long term activity and development activity with particular reference to in-combination effects and the Natura 2000 sites; and housing and social implications of the increased 'temporary' population will benefit from joint evaluation and development for reflection in the final PSP DPD. BCC will be particularly keen to ensure that the legacy of the construction period is managed with effective benefit for all the adjoining areas to the development that are impacted on by the construction and delivery of the new nuclear power station. It would be most helpful to establish a series of meetings with colleagues in adjoining authorities and statutory stakeholders to develop the potential asks further.</p>	<p>Considers PSP44 Oldbury NNB is a DtC matter because its implementation will have implications for Bristol.</p>	<p>of the strategic policies set out in the Core Strategy. Can confirm this review is not being progressed as part of the PSP DPD as this is matter considered most appropriately addressed through the Core Strategy/ Local Plan review.</p> <p>Noted. Continue to maintain consultation / liaison. ONN DtC Liaison Group to be established and to act as forum for inputting into emerging PSP DPD/ inputting into reviewing DCO process</p>
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	<p>Local Plan Policies It is unclear why the Local Plan policies are listed at the beginning of each draft policy as presumably the saved Local Plan policies will eventually be superseded by the new policies? Is this for convenience at this stage?</p> <p>Duty of Cooperate Questions Commenting on your direct questions re Duty to Co-operate as set out in your covering e-mail:</p> <p>Unless anything has changed from the Core Strategy position or results in a different interpretation of the Core Strategy then the Policies, Sites and Places Plan should not generally raise new matters that would have a significant impact on at least two planning areas; these would have been identified and addressed in the Core Strategy. Would assume any cross boundary strategic matters in the Policies, Sites and Places Plan relate primarily to the detailed implementation of the strategic policies set out in the Core Strategy.</p> <p>Any policy could have cross boundary implications as they evolve during the plan preparation process. We would be pleased to consider any strategic implications of the Policies, Sites and Places Plan when further detail is available at the next consultation stage in the summer.</p>		<p>Noted. Reference to existing saved SGLP policies is made to assist the reader of the Plan understand what PSP policies will replace these upon Plan adoption.</p> <p>Comments noted</p> <p>Comments noted</p>
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<p>Jonathan Peters Marine Management organisation</p>	<p>The MMO fully appreciates the requirement of the Planning and Compulsory Purchase Act 2004 (PCPA) and the obligations that it places on local authorities with regards to the production of local plans and requirements to be fulfilled in order to ensure the successful adoption of plans. However, the MMO does not have a responsibility in determining whether any local plan has met these obligations, with this assessment being the prevue of the Planning Inspectorate and any appointed inspector who will check that the Plan meets relevant requirements including those set out under s20(5)(a) and the duty to co-operate under s20(5)(c) of the PCPA before moving on to test for soundness.</p> <p>Given that this determination the sole responsibility of the examining inspector from the Planning Inspectorate, the MMO is unable to state whether this duty has been complied with. However, the MMO will of course be on hand to respond requests for support from the Planning Inspectorate regarding consideration of marine plans and the Marine Policy Statement (MPS) under the both the PCPA and the Marine and Coastal Access Act 2009, particularly in light of the relatively recent introduction of the marine planning system in England.</p> <p>The MMO looks forward to continued engagement with South Gloucestershire Council as part of the development of both marine and land based plans in the future.</p>	<p>n/a</p>	<p>Comments noted</p>
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SPP&SA, 11th July 2014