



Strategic Planning Policy and Specialist Advice Team
South Gloucestershire Council
Environment and Community Services Department
PO Box 299
Civic Centre
High Street
Kingswood
Bristol
BS15 0DR

SENT BY E-MAIL AND POST

30 July 2015

Dear Sir / Madam

SOUTH GLOUCESTERSHIRE DESIGNATED LOCAL GREEN SPACES INFORMAL CONSULTATION

Introduction

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following comments and in due course attend the South Gloucestershire Policies, Sites & Places DPD Examination Hearing Sessions to discuss these matters in greater detail.

Policy PSP4 : Designated Local Green Spaces

The HBF representations to the South Gloucestershire Policies, Sites and Places DPD Draft consultation in August 2014 and the Pre Submission consultation ended on 3 July 2015 set out concerns about the Council's proposal for the potential allocation of circa 560 areas of Designated Local Green Space.

As stated in paragraphs 76 and 77 of the NPPF Local Green Space designation will not be appropriate for most green areas or open spaces because any areas designated as Local Green Spaces must be demonstrably special to a local community and be of particular local significance because of its beauty, historic significance, recreational value. The NPPG (ID 37-009-

20140306) emphasises that Designated Local Green Spaces must be demonstrably special to the local community and therefore this special nature must be evidenced. The NPPG also advises that where land is already protected by designations such as Area of Outstanding Natural Beauty, Site of Special Scientific Interest, Scheduled Monument or conservation area, consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space (ID 37-011-20140306). It is difficult to believe that there are potentially circa 560 green spaces in South Gloucestershire that are demonstrably special to a local community and of particular local significance.

Designated Local Green Space should be local in character as opposed to an extensive tract of land as stated in the NPPG (ID: 37-015-20140306) the blanket designation of extensive tracts of land and open countryside adjacent to settlements is not appropriate. So it is equally difficult to comprehend that many of these allegedly demonstrably special spaces of particular local significance are joined together forming extensive tracts of land and open countryside adjacent to settlements, for example proposals in Charfield, Hanham Abbots, Iron Acton, Tormarton, Westerleigh and Yates Parishes. Paragraph 78 of the NPPF confirms that managing development within a Designated Local Green Space should be consistent with national policy for Green Belts. Therefore Designated Local Green Spaces should not be proposed to achieve by stealth what could be seen as the designation of a new localised Green Belt around smaller settlements.

From this current informal consultation it is now understood that of the circa 560 nominated areas approximately 103 areas are identified as “*considered currently suitable for designation*” by the Council. It is interesting to note that Cheltenham Borough Council is carrying out a similar consultation on Designated Local Green Spaces as part of its Cheltenham Plan Issues and Options consultation however the number of proposed designations amounts to only 29 areas which further highlights the disproportionate number of potential allocations in South Gloucestershire.

As previously stated in HBF representations it is procedurally irregular that the Regulation 19 South Gloucestershire Pre Submission Policies Sites & Places DPD consultation including Policy PSP4 which ended on 3rd July 2015 commenced ahead of the consultations to determine the final list of Designated Local Green Spaces in Appendix 2 and the final Proposals Map associated with Policy PSP4. It is unfortunate that this separate consultation process on changes to the Proposals Map and Appendix 2 has a different timescale to the DPD consultation as proposed this current informal consultation ends on 30th July 2015 whilst the final list in Appendix 2 and the final Proposals Map will not be formally consulted upon until September / October 2015. It is also noted that this current separate consultation does not cross reference to the DPD consultation. Therefore it is possible that land owners have been confused by the separate processes and denied the opportunity to submit representations. Moreover it is not obvious if the Council has contacted land owners directly about the potential designation of their land as Local Green Space and the development management implications of such a designation. The land owners affected by Policy PSP4 may be

unaware of the proposed designation of their land and even if aware of the potential designation they may be unaware of the relationship with Policy PSP4 and that the consequential implications for managing development is the same as Green Belt.

Conclusion

For the South Gloucestershire Policies, Sites & Places DPD to be found sound under the four tests of soundness as defined by paragraph 182 of the NPPF, the Plan must be positively prepared, justified, effective and compliant with national policy. Unfortunately there are a number of concerns about the soundness of the DPD with particular reference to Policy PSP4 as outlined above. Therefore the DPD has not been positively prepared and properly justified as such it is inconsistent with national policy and is likely to be ineffective.

It is recommended that after further formal consultation with land owners and other interested parties on Designated Local Green Spaces the Regulation 19 Pre Submission South Gloucestershire Policies Sites & Places DPD including Policy PSP4 together with Proposals Map and Appendix 2 is re-run. If the process is not re-run as suggested then Policy PDP4 should be deleted before submission of the South Gloucestershire Policies Sites & Places DPD to the Secretary of State for examination. If as suggested Policy PSP4 is not re-consulted upon or alternatively deleted the Council's actions may be vulnerable to Judicial Review.

In conclusion it is hoped that these representations are of assistance to the Council in preparing the next stages of the South Gloucestershire Policies, Sites and Places DPD. If any further information or assistance is required please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**

[REDACTED]

Susan E Green MRTPI
Planning Manager – Local Plans

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 31 July 2015 11:48
To: Planning LDF
Subject: RE: 2015-07-30 157481 South Gloucestershire Policies Sites and Places Plan (PSP Plan): Local Green Space Designation

Dear Sir/Madam

Thank you for consulting Natural England regarding the above, and please accept my apologies for the delay in our response - I can confirm however that Natural England has no specific comments to make on the list of spaces nominated for designation as Local Green Space.

Kind regards, Amanda

Amanda Grundy
Lead Adviser
Somerset, Avon & Wiltshire Team
Natural England
Temple Quay House
2 The Square
Bristol BS1 6DG

[REDACTED]

[REDACTED]

www.gov.uk/naturalengland

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

Natural England is accredited to the Cabinet Office Customer Service Excellence Standard

From: South Gloucestershire Online Consultations (do not reply) [<mailto:do-not-reply@consultations.southglos.gov.uk>]
Sent: 18 June 2015 19:29
To: Consultations (NE)
Subject: Public consultation - South Gloucestershire Policies Sites and Places Plan (PSP Plan): Local Green Space Designation

Dear Sir/Madam

South Gloucestershire Policies Sites and Places Plan (PSP Plan): Local Green Space Designation

In 2012, the National Planning Policy Framework introduced a new designation - Local Green Space (LGS). The Local Green Space designation is a way to provide special protection against development for green areas of particular importance to local communities. Local Green Spaces can be designated either in a Local Plan or in a Neighbourhood Plan.

Local Green Space Designation

The South Gloucestershire Local Plan: Proposed Submission Policies, Sites and Places Plan (PSP Plan) is currently out for consultation and includes Policy PSP4: Designated Local Green Spaces. This policy restricts inappropriate development on land designated as a Local Green Space.

Individual Local Green Spaces will be identified in Appendix 2 of the PSP Plan and their extent will be defined on the Policies Map. The PSP Plan can be accessed from www.southglos.gov.uk/PSPpublication

Process so far

Spaces have been nominated through a number of opportunities during the preparation of the PSP Plan. Firstly, during the preparation of the PSP Plan in September 2013 through targeted consultation with Town/Parish Councils & elected Members; secondly, through public consultation during Summer 2014, and finally through follow-up engagement with Town/Parish Councils & elected Members from October 2014 - February 2015.

Public consultation

The Council is now inviting comments on the list of spaces nominated for designation as Local Green Space in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This consultation period will run for a 6 week period between **18 June and 30 July 2015**.

This informal consultation provides current details of the nominated spaces, their suitability for designation and provides details of the justification submitted to support the designation. No formal Council decision has been made regarding the nominated spaces. This consultation provides the opportunity to review the mapping and evidence that has been provided to date. It also provides land owners with the opportunity to comment on proposed nominations which affect their land.

There are around 560 spaces nominated for designation, around 500 of which have been provided with a map. No further additional spaces can be accepted at this stage.

Consultation documents

The following comprise the consultation documents. These can be viewed at www.southglos.gov.uk/lgsd15

- Local Green Space Updated Guidance Note - June 2015
- List of nominated Local Green Spaces
- Explanation of the list of nominated Local Green Spaces
- Mapped, nominated Local Green Spaces (by area)
- Response Form

How to respond

Comments should be made using the response form available online (www.southglos.gov.uk/lgsd15) and should be submitted to the Council (at the addresses provided below) by close of business on **30 July 2015**.

- By e-mail: PlanningLDF@southglos.gov.uk
- By post: Strategic Planning Policy and Specialist Advice Team, South Gloucestershire Council, Environment and Community Services Department, PO Box 299, Civic Centre, High Street, Kingswood, Bristol, BS15 0DR.

Please note - all comments made about individual Local Green Spaces should clearly reference the Green Space code provided in both the List of nominated Local Green Spaces and the map booklets.

Viewing documents

The consultation documents are available to view online using the link: www.southglos.gov.uk/lgsd15 at South Gloucestershire Libraries (please refer to www.southglos.gov.uk/libraries for locations and opening times).

The consultation documents are also available to view online from 8.45am - 5pm Mondays to Wednesdays and 8.45am - 4.30pm Thursdays and Fridays, at the Council's One-Stop Shops:

- Thornbury Library, St Mary Street, Thornbury, BS35 2AA
- Yate, Kennedy Way, BS37 4DQ (access via West Walk)
- Kingswood Civic Centre, High Street, Kingswood, BS15 9TR
- Patchway Hub, Rodway Road, Patchway, BS34 5PE

Next steps

Following the completion of this informal consultation the responses will be appraised by officers, and the list of spaces for designation finalised and agreed by the Council. The final list of spaces, which will form part of the

proposed submission PSP Plan, will be subject to a formal public consultation - this is anticipated to be in September/October 2015. Following this period, the list of LGS will be included in the PSP Plan and will be subject to examination by an independent Inspector appointed by the Secretary of State.

If you have any questions please do not hesitate to contact us by email: PlanningLDF@southglos.gov.uk or by telephone: 01454 863464.

Data protection

The information collected as part this consultation will also be used by the Council in accordance with the data protection principles in the Data Protection Act 1998. The purposes for collecting this data are: to assist in plan making; and to contact you, if necessary, regarding the planning consultation process. Some of the data may be made public as it will form part of the evidence base used to inform the creation of planning policy documents. The above purposes may require public disclosure of any data received on the response form, in accordance with the Freedom of Information Act 2000.

Yours faithfully,

Strategic Planning Policy and Specialist Advice Team
South Gloucestershire Council

This email and any attachments is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender. Whilst this email and associated attachments will have been checked for known viruses whilst within the Natural England systems, we can accept no responsibility once it has left our systems. Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

[REDACTED]

From: Andrew Lane
Sent: 10 July 2015 09:35
To: Planning LDF
Cc: Robin Levenston
Subject: RE: Policies Sites and Places Plan (PSP Plan): Local Green Space Designation

Both.

It needs to be recorded as a late rep to the PSP Plan, see that Gary welcomes and supports the PSP Plan – but that he goes on to provide a general statement about what type of open space should be protected, which is a comment to the LGSD cons.

Thanks

Andrew Lane
Principal Planning Officer

[REDACTED]

From: Planning LDF
Sent: 10 July 2015 09:27
To: Andrew Lane
Cc: Robin Levenston
Subject: FW: Policies Sites and Places Plan (PSP Plan): Local Green Space Designation
Importance: High

Hi Andrew,

Do I need to file this in PSP Late responses and/or LGSD responses?

Thanks,

Chloe

From: [REDACTED]
Sent: 09 July 2015 15:21
To: Planning LDF
Cc: Rob Stirzaker
Subject: Policies Sites and Places Plan (PSP Plan): Local Green Space Designation
Importance: High

Thank you for the consultation letter on the Policies Sites and Places Plan (PSP Plan): Local Green Space Designation document. We welcome and support this PSP Plan.

Sport England would expect to see playing pitches, bowls greens, golf etc and other formal and informal sports spaces incorporating 'green infrastructure' to be listed as sites under the designation "Local Green Space Designation".

There is work on-going by the Council to develop a Sports Strategy underpinned by a Playing Pitch Strategy and a Sports Facility Strategy in line with para 73 of the NPPF which will identify sports (bowls etc) and pitch sites.

If you need to discuss, please contact me.

Gary Parsons Planning Manager [REDACTED]

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited.

This email has been scanned for email related threats and delivered safely by Mimecast.
For more information please visit <http://www.mimecast.com>

[REDACTED]

From: [REDACTED]
Sent: 19 June 2015 12:41
To: Planning LDF
Subject: FW: Public consultation - South Gloucestershire Policies Sites and Places Plan (PSP Plan): Local Green Space Designation

Dear Sir/Madam

Thank you for consulting Gloucestershire County Council on the above matter. I can confirm that we have no comments to make.

Thank you

Rob Niblett

From: South Gloucestershire Online Consultations (do not reply) [mailto:do-not-reply@consultations.southglos.gov.uk]
Sent: 18 June 2015 22:12
To: NIBLETT, Robert
Subject: Public consultation - South Gloucestershire Policies Sites and Places Plan (PSP Plan): Local Green Space Designation

Dear Sir/Madam

South Gloucestershire Policies Sites and Places Plan (PSP Plan): Local Green Space Designation

In 2012, the National Planning Policy Framework introduced a new designation - Local Green Space (LGS). The Local Green Space designation is a way to provide special protection against development for green areas of particular importance to local communities. Local Green Spaces can be designated either in a Local Plan or in a Neighbourhood Plan.

Local Green Space Designation

The South Gloucestershire Local Plan: Proposed Submission Policies, Sites and Places Plan (PSP Plan) is currently out for consultation and includes Policy PSP4: Designated Local Green Spaces. This policy restricts inappropriate development on land designated as a Local Green Space.

Individual Local Green Spaces will be identified in Appendix 2 of the PSP Plan and their extent will be defined on the Policies Map. The PSP Plan can be accessed from www.southglos.gov.uk/PSPpublication

Process so far

Spaces have been nominated through a number of opportunities during the preparation of the PSP Plan. Firstly, during the preparation of the PSP Plan in September 2013 through targeted consultation with Town/Parish Councils & elected Members; secondly, through public consultation during Summer 2014, and finally through follow-up engagement with Town/Parish Councils & elected Members from October 2014 - February 2015.

Public consultation

The Council is now inviting comments on the list of spaces nominated for designation as Local Green Space in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This consultation period will run for a 6 week period between **18 June and 30 July 2015**.

This informal consultation provides current details of the nominated spaces, their suitability for designation and provides details of the justification submitted to support the designation. No formal Council decision has been made regarding the nominated spaces. This consultation provides the opportunity to review the mapping and evidence that has been provided to date. It also provides land owners with the opportunity to comment on proposed nominations which affect their land.

There are around 560 spaces nominated for designation, around 500 of which have been provided with a map. No further additional spaces can be accepted at this stage.

Consultation documents

The following comprise the consultation documents. These can be viewed at www.southglos.gov.uk/lgsd15

- Local Green Space Updated Guidance Note - June 2015
- List of nominated Local Green Spaces
- Explanation of the list of nominated Local Green Spaces
- Mapped, nominated Local Green Spaces (by area)
- Response Form

How to respond

Comments should be made using the response form available online (www.southglos.gov.uk/lgsd15) and should be submitted to the Council (at the addresses provided below) by close of business on 30 July 2015.

- By e-mail: PlanningLDF@southglos.gov.uk
- By post: Strategic Planning Policy and Specialist Advice Team, South Gloucestershire Council, Environment and Community Services Department, PO Box 299, Civic Centre, High Street, Kingswood, Bristol, BS15 0DR.

Please note - all comments made about individual Local Green Spaces should clearly reference the Green Space code provided in both the List of nominated Local Green Spaces and the map booklets.

Viewing documents

The consultation documents are available to view online using the link: www.southglos.gov.uk/lgsd15 at South Gloucestershire Libraries (please refer to www.southglos.gov.uk/libraries for locations and opening times).

The consultation documents are also available to view online from 8.45am - 5pm Mondays to Wednesdays and 8.45am - 4.30pm Thursdays and Fridays, at the Council's One-Stop Shops:

- Thornbury Library, St Mary Street, Thornbury, BS35 2AA
- Yate, Kennedy Way, BS37 4DQ (access via West Walk)
- Kingswood Civic Centre, High Street, Kingswood, BS15 9TR
- Patchway Hub, Rodway Road, Patchway, BS34 5PE

Next steps

Following the completion of this informal consultation the responses will be appraised by officers, and the list of spaces for designation finalised and agreed by the Council. The final list of spaces, which will form part of the proposed submission PSP Plan, will be subject to a formal public consultation - this is anticipated to be in September/October 2015. Following this period, the list of LGS will be included in the PSP Plan and will be subject to examination by an independent Inspector appointed by the Secretary of State.

If you have any questions please do not hesitate to contact us by email: PlanningLDF@southglos.gov.uk or by telephone: 01454 863464.

Data protection

The information collected as part this consultation will also be used by the Council in accordance with the data protection principles in the Data Protection Act 1998. The purposes for collecting this data are: to assist in plan making; and to contact you, if necessary, regarding the planning consultation process. Some of the data may be made public as it will form part of the evidence base used to inform the creation of planning policy documents. The above purposes may require public disclosure of any data received on the response form, in accordance with the Freedom of Information Act 2000.

Yours faithfully,

Strategic Planning Policy and Specialist Advice Team
South Gloucestershire Council

Think before you print - only print this email if absolutely necessary.

This email and any attachments are strictly confidential and intended for the addressee only. If you are not the named addressee you must not disclose, copy or take any action in reliance of this transmission and you should notify us as soon as possible.

This email and any attachments are believed to be free from viruses but it is your responsibility to carry out all necessary virus checks and Gloucestershire County Council accepts no liability in connection therewith.



From: [Redacted]
Sent: 02 July 2015 16:33
To: Planning LDF
Subject: South Gloucestershire Policies Sites and Places Plan (PSP Plan) : Local Green Space Designation

Categories: Green Category

Dear Sir/Madam,

Thank you for consulting ORR on the above proposed submission Policies Sites and Places Plan (PSP Plan) : Local Green Space Designation.
The Office of Rail and Road has no comment to make on this particular document.

Kind regards

A Harrison
Planning Executive

Office of Rail and Road | One Kemble Street | 2nd and 3rd Floors | London | WC2B 4AN



Web: www.orr.gov.uk

ORR will use the name Office of Rail and Road for operating purposes with effect from 1 April 2015. Legal force is expected to be given to this name from 1 October 2015.

We cannot accept any liability for any loss or damage sustained as a result of software viruses. You must carry out such virus checking as is necessary before opening any attachment to this message. The information in this email and any files transmitted with it may be of privileged and/or confidential nature and is solely for the addressee(s). If you are not intended addressee please notify us immediately, and note that any disclosure, copying or distribution by you is prohibited and may be unlawful. The views expressed in this email are not necessarily the views of the Office of Rail Regulation

The original of this email was scanned for viruses by the Government Secure Intranet virus scanning service supplied by Vodafone in partnership with Symantec. (CCTM Certificate Number 2009/09/0052.) This email has been certified virus free.
Communications via the GSi may be automatically logged, monitored and/or recorded for legal purposes.