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Date 28 July 2015
Our ref 31054/06/GW/9369253v1
Your ref

Dear Sir / Madam

South Gloucestershire Local Plan: Policies, Sites & Places Plan - Local Green Space Consultation

We provide comments on behalf of our client, Lockleaze Recreation Ground Charity (LRGC) in conjunction with Redrow Homes in response to the Council's consultation on the South Gloucestershire Local Plan: Policies, Sites & Places Plan - Local Green Space. Our client's comments are made with specific reference to proposed Local Green Space designation site reference LGSD959 – Bonnington Walk Playing Fields (adjacent to Stanley Farm/MOD).

Context of the Representation

We understand that a list of Local Green Spaces has been formulated which identifies all sites nominated through a number of opportunities during the preparation of the PSP Plan. These sites have then undergone initial assessment by the Council, with opportunity provided now to assess these nominated sites and provide additional evidence.

As stated above, our clients have an interest in nominated site LGSD959 – Bonnington Walk Playing Fields (adjacent to Stanley Farm/MOD). Within the list of sites, it is noted that the Council has assessed the site as being currently unsuitable for designation. Our client is wholly supportive of this conclusion, particularly as much of the land is subject to planning applications which will change its status including planning applications to relocate Lockleaze Recreation Ground to a new community sports facility in Frenchay (enabled via the redevelopment of this existing site) which are currently being determined by the Council.

We provide additional information below regarding the site context and planning history. We also provide additional evidence to support the Council's conclusion in the accompanying response form.



Site LGSD959 - Context and Background

Our clients are the joint applicants on two separate full planning applications which have been submitted to South Gloucestershire Council (SGC) in parallel to realise LRGC's vision to deliver a new community sports facility for Dings Crusaders Rugby Football Club and its Community Sport Club in Frenchay via the redevelopment of LRGC's existing site for housing at Landseer Avenue in Lockleaze:

- a Planning application PT15/0510/F – the development of 149 residential dwellings (including 52 affordable homes), together with open space, sustainable urban drainage, accesses and landscaping at Lockleaze Recreation Ground, Landseer Avenue, Lockleaze; and
- b Planning application PT15/0493/F – the development of a new community sports facility for Dings Crusaders RFC comprising an all-weather 3G sports pitch and grass rugby pitches, clubhouse building (to include community sports hall, changing rooms, spectator seating/viewing area, function/meeting rooms and club shop), car parking, accesses and landscaping at Frenchay Park Road, Frenchay.

Lockleaze Recreation Ground that forms the southern part of LGSD959, is owned by LRGC (identified by the enclosed ownership plan) and also forms the basis of planning application PT15/0510/F. These comments are therefore made by the landowner of part of LGSD959 and require careful consideration.

The submission documentation for planning application PT15/0493/F, provides detailed evidence of the compelling needs case for LRGC to relocate to safeguard the future viability of the Charity, which can only be realised by the sale of their existing site for residential purposes.

SGC needs to consider the future needs of valued existing sports clubs, such as LRGC and their community sports club partners – Dings Crusaders Community Sports Club and Dings Crusaders RFC, in order to secure their long term future within South Gloucestershire. In line with NPPF, the new facility will increase the clubs' ability to maximise participation in sports and recreation in the local community with significant benefits.

By way of background, Dings Crusaders Community Sport Club has been in Lockleaze since 1949 and has physically outgrown the existing ground at Land at Landseer Avenue. Specific constraints at the current site relate to pitch orientation being constrained by the site boundaries, no bespoke junior provision on site and inadequate indoor facilities. None of the rugby pitches comply with RFU full size recommended dimensions and none have drainage. In addition, the levels of repair required to the club house, as well as land available to bring the existing facilities up to modern standards, means remaining in the existing location is unfortunately an unrealistic and unviable option. In this regard, our clients consider it necessary to relocate from their existing ground in Lockleaze, to an alternative site at Hillside Gardens in Frenchay. In order to fund this necessary relocation, the Club has recently negotiated an agreement with Redrow Homes, whereby it is proposed that the existing site will be developed for housing, with a view to re-investing the proceeds from this sale to provide a larger and significantly improved community sports facility in Frenchay.



In addition, the northern part of LGSD959 is subject to a live planning application (PT14/2849/F), with a resolution to grant planning permission by SGC subject to the signing of a Section 106 Agreement. The application seeks permission to demolish the existing changing rooms and clubhouse and redevelop the site for 95no. dwellings, provision of a sports centre, all weather pitches, grass pitches, multi-use games area, car parking, new informal and formal public open space, car parking and other ancillary development. Redrow Homes also have an interest in the residential element of the application. Planning Policy Guidance makes it clear that Local Green Space designation is rarely appropriate where the land has planning permission for development.

In conclusion, the land indicated should not be allocated as Local Green Space and we support the Council's conclusions on this. To do so, would prejudice any ability that LRGC has to relocate via enabling redevelopment of its existing site (which remains the only viable option) and in turn would significantly jeopardise the future viability of the Charity and its tenant sports clubs.

We look forward to receiving confirmation that the Council's assessment of the site being unsuitable for local green space designation is upheld. In the meantime, please do not hesitate to contact Jenny Mitter or me if you require additional information.

Yours faithfully

Andy Cockett
Planning Director

Copy [REDACTED] Redrow Homes
[REDACTED] LRGC

Local Green Space Consultation – June 2015 Response Form

Your name / organisation:

Andy Cockett, Nathaniel Lichfield & Partners on behalf of Redrow Homes in conjunction with Lockleaze Recreation Ground Charity (LRGC)

Address and contact details (please include phone number & email address):

One Temple Quay
Temple Back East
Bristol
BS1 6DZ
[Redacted]

In order to be able to proceed with the protection of the green spaces that have been put forward for designation as Local Green Spaces we must have for each space:

- details of the ownership of the land (if at all possible)
- a map of the boundaries
- an explanation of how it meets the criteria for designation and
- specific justification for why it is demonstrably special to the local community

Therefore please first check the List of Nominated Local Green Spaces and maps which can be viewed at: www.southglos.gov.uk/lgsd15 which identifies where further information on any of the above is still needed and then provide us with the additional information where necessary using this form:

PLEASE USE A SEPARATE FORM FOR EACH GREEN SPACE

Name and code of nominated space:

Please clearly reference the individual Local Green Space’s code provided in both the List of nominated Local Green Spaces and the maps, available from www.southglos.gov.uk/lgsd15

LCSG959 – Bonnington Walk Playing Fields (adjacent to Stanley Farm/MOD)

A) Ownership of Local Green Space

Please indicate if you or your organisation are the landowner:

Our clients, LRGK are the landowners of part of the southern part of the site.

If you are not the landowner can you provide their name and contact details?

[Redacted]

Is the land owner aware of the proposal to designate their land?

Whilst our clients were aware that the Draft Policies, Sites & Places (PS&P) Plan proposed the ‘Trust Recreation Ground’ as a Local Green Space, a map of the area proposed for designation was not provided at that time or verified with the Parish Council who put the space forward for designation.

Therefore, it is not until this consultation that our clients have been in a position to fully understand the extent of land proposed to be designated by LGSD959.

(If you are not the landowner please now continue to Section B)

If you are the landowner, are you in support of or objecting to the proposals to designate this land?

Object.

If you are objecting to the proposals to designate your land, what are your reasons? (please refer to criteria in sections C and D below in particular)

Our clients object to the designation of any of the area comprising the Lockleaze Recreation Ground as a Local Green Space and as part of our representations, we provide a letter which establishes the context for this objection. We are also fully supportive of the Council's assessment that the site is not suitable for designation and does not meet the relevant criteria.

In brief LRGC has a longstanding need to relocate the existing community sports facilities at Lockleaze Recreation Ground in order to safeguard the future viability of the Charity, which can only be realised by the sale of their existing site for residential purposes.

As such, an allocation as Local Green Space would completely undermine the Charity's relocation plans and ultimately its survival. Indeed, if the Charity were unable to move from the current site, it will undoubtedly cease to exist in the future.

Redrow Homes also object to the inclusion of any of the northern part of the site comprising part of the Bonnington Walk Playing Fields site as a Local Green Space. This area of land is subject to a planning application for residential development (PT14/2849/F), which received a recent resolution to grant permission by South Gloucestershire's Planning Committee.

Redrow Homes has an interest in this application and will be the end developer for the residential element of the proposal.

B) Map of proposed Local Green Space

PLEASE PROVIDE A MAP WHICH SHOWS THE BOUNDARIES OF THE PROPOSED LOCAL GREEN SPACE

If not previously provided. Please see List of Nominated Local Green Spaces and Mapped, nominated Local Green Spaces to check if this is required. www.southglos.gov.uk/lgsd15

N/A.

IF YOU ARE THE LANDOWNER PLEASE PROVIDE A MAP OF YOUR OWNERSHIP

This is particularly important if this differs from the area proposed for designation e.g. if you own only part of the proposed Local Green Space, see the Mapped, nominated Local Green Spaces: www.southglos.gov.uk/lgsd15

Please see enclosed plan identifying the extent of LRGC's land ownership.

C) Does the space meet the national criteria for designation as a Local Green Space?

Please provide a response to each of the following 5 criteria - where information has not already been provided or is incorrect in the List of nominated Local Green Spaces. (Table 1 of the Local Green Space Designation Updated Guidance Note (June 2015) www.southglos.gov.uk/lgsd15 provides further details of the criteria and guidance on what sort of information you may wish to submit):

1. Is the proposed space subject to a planning permission for development? (See Criteria 1 in the guidance note)

The northern part of the site forms part of a current live planning application (PT14/2849/F) for demolition of existing changing rooms and clubhouse and proposed development of 95no. dwellings, provision of sports centre, all weather pitches, grass pitches, multi-use games area, car parking, new informal and formal public open space, car parking and other ancillary development. A resolution to grant planning permission was recently made by Planning Committee and the Section 106 Agreement is expected to be signed shortly.

The southern part of the site (which falls within LRGC's ownership) is also subject to a live planning application (PT15/0510/F) for demolition of existing Rugby Clubhouse buildings (The Dings, subject to separate relocation application PT15/0493/F) and erection of 149no dwellings, with open space, sustainable urban drainage, vehicular and pedestrian access, landscaping, infrastructure and engineering works.

A parallel application (PT15/0493/F) has also been submitted to South Gloucestershire Council to realise Lockleaze Recreation Ground Charity's (LRGC) vision to deliver a new community sports facility for Dings Crusaders Rugby Football Club and its Community Sport Club in Frenchay. This application seeks the development of a new community sports facility for Dings Crusaders RFC comprising an all-weather 3G sports pitch and grass rugby pitches, clubhouse building (to include community sports hall, changing rooms, spectator seating/viewing area, function/meeting rooms and club shop), car parking, accesses and landscaping at Frenchay Park Road, Frenchay. The proposed sports facilities at Frenchay will only be possible through the redevelopment of LRGC's existing site for housing by Redrow Homes.

The planning submission for planning application PT15/0493/F, provides detailed evidence of the compelling needs case for LRGC to relocate to safeguard the future viability of the Charity, which can only be realised by the sale of their existing site for residential purposes.

Designating LRGC's existing site as a Local Green Space and restricting 'inappropriate development' (which would include residential development), will completely compromise the Charity's ability to realise their vision for a new community sports facility within the local area.

National Planning Policy Guidance 'Open space, sports and recreation facilities, public rights of way and local green space' clearly sets out that '*Local Green Space designation will rarely be appropriate where the land has planning permission for development. Exceptions could be where the development would be compatible with the reasons for designation or where planning permission is no longer capable of being implemented.*'

The designation of the land LGSD959 does not comply with this criteria and the South

Gloucestershire Local Plan: LGSC Guidance Note, June 2015 clearly states that a potential Local Green Space must meet all the criteria 1-5 listed in Table 1 of the Guidance Note.

2. Is the proposed space the subject of an allocation, or proposal to allocate, for development in the Local Plan? (See Criteria 2 in the guidance note)

Whilst not currently allocated in the South Gloucestershire Local Plan (2006) or the South Gloucestershire Policies, Sites and Places Plan, the LRG site has been previously submitted as a Candidate Site during the Call for Sites consultation in February 2014 and further representations were made to the Draft PS&P Plan (Summer 2014) and the submission version of PS&P Plan (July 2015) seeking the allocation of the land for residential development in line with planning applications PT15/0510/F and PT15/0493/F to facilitate the Charity's move.

3. Is the proposed space an extensive tract of land and is it local in character? (See Criteria 3 in the guidance note)

LGSD959 is not considered to be an extensive tract of land. However given that the northern part of the site forms part of planning application PT1514/2849/F which extends to a larger parcel of land, the extent of the land identified through LGSD959 does not present clearly defined edges.

In terms of the space's social connection to the local area, the site is more than just a local facility for the immediate local community, it also also draws players and members from a very wide catchment area across the North Fringe from both South Gloucestershire and Bristol. However, it is the Charity which connects this space to the local area and whilst the current proposals will see the Charity relocate to a new site at land off Frenchay Park Road in Frenchay, its links to the community will not change.

In terms of the physical connection between the site and the local area, vehicular access is currently available from Landseer Avenue, Lockleaze. However the site is a private sports facility and whilst LRG provides a recreational facility for the local community it is not an open access playing field but rather provides private training pitches and facilities for Dings Crusaders RFC and other tenant clubs.

4. Is the space within close proximity to the community it serves? (See Criteria 4 in the guidance note)

As noted in (3) above, the part of LGSD959 within LRG's ownership is a private sports facility providing private training pitches and facilities for Dings Crusaders RFC and other tenant clubs. The club attracts players and supporters from across The North Fringe and beyond and therefore the 'community' it serves is wide and cannot be confined to its immediate environs.

The site's main influence on the local area is through its social connection and its use as a private sports facility. Proposals put forward under planning applications PT15/0510/F and PT15/0493/F will see the Charity relocate from its existing site to a site in Frenchay via the redevelopment of their existing site for residential use by Redrow Homes.

Whilst the Charity's plans will see a relocation of the site, it will still serve the same wide

community as the Charity has sought to ensure that the proposed site is within close enough proximity to ensure that a social connection is maintained.

5. Is the specific space demonstrably special to the local community? e.g. not a blanket designation (see Criteria 5 in the guidance note)

The Bonnington Walk Playing Fields and LRGC land is a large area of land and a blanket designation across it is not appropriate in accordance with the guidance.

The specific LRGC land is not demonstrably special to the local community in itself alone in terms of criterion 5. It is the tenant clubs including Dings Crusaders RFC are what make the site special to the local and wider community and should their existence cease this would cause significant harm.

The relocation proposals will ensure that the clubs stay within the same ward and thus there will be limited impact on the local community and the charity's future viability will be safeguarded.

When considering if the space is demonstrably special to the local community, the space must meet at least one of criteria 6-11 in Table 2 of the South Gloucestershire Local Plan: LGSD Guidance Note, June 2015.

Please see Section D below for further information.

D) Why is the space of particular local significance?

Please use the following response box to provide specific evidence as to how at least one of the following criteria is relevant:

Please state which criterion, 6-11, are relevant to the nominated space. Table 2 of the Local Green Space Designation Updated Guidance Note (June 2015) www.southglos.gov.uk/lgsd15 provides further details on the criteria and guidance on what sort of information you may wish to submit to justify how the space is of particular local significance and demonstrably special to the community that use it:

6. The proposed space is of particular local significance because of its beauty
7. The proposed space is of particular local significance because of its historic significance
8. The proposed space is of particular local significance because of its recreational value
9. The proposed space is of particular local significance because of its tranquillity
10. The proposed space is of particular local significance because of its richness of wildlife
11. The proposed space is of particular local significance because of another reason not covered by criteria 6-10.

The land is not of local significance in terms of criterion 6 to 11. In terms of criterion 8 and recreational use which is the most relevant criterion we comment as follows:

It is recognised that part of the site within LRGC's ownership has connections to the local community although this is due the tenant clubs including Dings Crusaders RFC which has a large number of supporters drawn from the local and wider area. Whilst the site has recreational value, it is solely used for formal sport and is not open to the local community for informal use. The tenant clubs are what makes the site special to the local community and should their existence cease this would cause significant harm to the local area and authority area as a whole.

The relocation proposals will ensure that the clubs stay within the same ward and thus there will be limited impact on the local community and the charity's future viability will be safeguarded. Overall the relocation proposals would significantly improve recreation and sports facilities to the benefit of the wider community.

Designating the site as a Local Green Space would undermine and compromise the Charity's ability to relocate and would have significant recreational harm.

Overall we support the Council's decision not to designate this Local Green Space as set out in the consultation documentation.

Please return completed forms by close of business on 30th 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.

Viewing documents

The consultation documents can be viewed from: www.southglos.gov.uk/lgsd15

The consultation documents are also available to view online at:

- South Gloucestershire Libraries (please refer to www.southglos.gov.uk/libraries for locations and opening times); and
- The Council's One-Stop Shops, from 8.45am - 5pm Mondays to Wednesdays and 8.45am - 4.30pm Thursdays and Fridays, in the following locations:
 - 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

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.

Land Registry
Official copy of
title plan

Title number **GR363384**
Ordnance Survey map reference **ST6077NE**
Scale **1:1250**
Administrative area **South Gloucestershire**



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