

# Gregory Gray Associates

CHARTERED TOWN PLANNING CONSULTANTS

Victoria House, 18 22, Albert Street, Fleet, Hampshire, GU51 3RJ.

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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.

9<sup>th</sup> December 2015

Dear Sir/Madam,

**SOUTH GLOUCESTERSHIRE LOCAL PLAN POLICIES, SITES AND PLACES  
DPD – REGULATION 18 CONSULTATION INCLUDING ADDITIONAL HOUSING  
ALLOCATIONS**

Gregory Gray Associates is instructed to write on behalf of Wyevale Garden Centres Ltd. who have a leasehold interest in Thornbury Garden Centre, Milbury Heath, Wootton-under-Edge, GL12 8QH.

Thornbury Garden Centre was rejected in the 2013 SHLAA as being *'not a suitable location for residential development in the context of the emerging Core Strategy which provides positively for housing growth consistent with paras. 17 (1 & %), 47, 159 of the NPPF - therefore 0% developable for residential purposes'*.

However the Council have now identified that there is currently a shortfall of 1500 dwellings which needs to be delivered over the next 5 years and is so now seeking to identify sites over and above those allocations in the Core Strategy including within the rural areas.

It is within this context that the Local Planning Authority is requested to re-examine the suitability of our client's site as a proposed housing site for allocation within the emerging Policies, Sites and Places DPD.

The Council propose to adopt a sequential approach to site selection with the aim of identifying the most sustainable locations for new residential development, prioritising those outside the Green Belt over those in Green Belt locations. The Council's Rural Settlements Sustainability Appraisal 2015 provides evidence to support such a sequential approach by identifying a hierarchy of sustainable settlements.

Director: G.W.R. Gray MSc. Dip.TP MRTPI ACI.Arb Secretary: C.J. Gray

Associate: A.J. Ayles BA(Hons.) BTP MRTPI

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Whilst, our client considers that it is appropriate to adopt a sequential approach to site selection, they are concerned that the one adopted by the Council, fails to give adequate weight to the redevelopment of previously developed land (such as my client's) as required by the NPPF.

Para. 17 of the Framework, indicates that one of the core planning principles that should underpin plan-making is an encouragement for the effective use of land by re-using land that has previously been developed (brownfield land) provided that it is not of high environmental value.


Thornbury Garden Centre is highly developed by means of extensive retail buildings, canopies and hardstanding. It is located close to the A38 which provides excellent access to the nearby town of Thornbury and to the wider highway network. Although not immediately adjacent to any settlement boundary, it forms part of enclave of existing commercial and residential development and could be redeveloped for housing purposes in a manner which achieves a net decreased impact upon the character of the surrounding countryside. In addition, any residential scheme is likely to lead to a net reduction in vehicular movements associated with the site to the benefit of local amenity and highway safety.

In such a manner, the re-use of previously developed land such as Thornbury Garden Centre, should clear be seen as sequentially preferable to use of undeveloped land, particularly that located within the Green Belt. As recognised in para. 4.2 of the Council's consultation document, any site allocation should achieve a sustainable form of development i.e. one that balances the economic, social and environmental objectives of the NPPF.

The re-use of a brownfield site, offers significant environmental advantages over use of a greenfield one, which should be weighed in the planning balance. It is not considered that the existing methodology adopted for selecting additional housing sites, adequately reflects this and accordingly it is requested that it be modified to include a greater emphasis on the re-use of brownfield land.

Furthermore, it is requested that the Local Planning Authority reconsider the suitability of Thornbury Garden Centre as a potential housing site for allocation within the emerging Policies, Sites and Places Plan. I attach a new copy of the Council's Call for Sites form for your use. Should you have any further queries, please do not hesitate to contact me.

Yours faithfully



Joanna Male  
cc. Client



## Policies, Sites and Places Plan – Call for Sites Response Form

This form should only be used by landowners and developers that are promoting a site for inclusion in the PSP Plan.

Comments are invited on the issues set out in paragraphs 19.1 – 22.2 of the PSP Plan Regulation 18 Consultation document in respect of the suitability, availability and achievability of potential housing sites. The purpose of these questions is to gauge potential preparedness to engage constructively in a possible planning application process, likelihood of achieving policy compliant schemes and early delivery of dwellings.

Comments related to the general methodology and process should be set out on the response form for the Regulation 18 Consultation document, available online: [www.southglos.gov.uk/PSPconsultation](http://www.southglos.gov.uk/PSPconsultation)

Please note that freedom of Information regulations mean that the Council cannot treat any information supplied confidentially.

For enquiries or assistance please contact the Strategic Planning Policy and Specialist Advice Team 01454 863469 or [planningLDF@southglos.gov.uk](mailto:planningLDF@southglos.gov.uk)

<b>1. YOUR DETAILS</b>	<b>Ref Number (for office use only)</b>	
Name		
Company/Organisation (if relevant)	<u>GREGORY GRAY ASSOCIATES</u>	
Address	<u>VICTORIA HOUSE</u> <u>18 – 22 ALBERT STREET,</u> <u>FLEET, HAMPSHIRE</u>	
Postcode	<u>GU51 3RJ</u>	
Telephone		
Email address		
I am (please tick all those that apply)	Owner of part of the site [ ] Planning consultant [ <input checked="" type="checkbox"/> ] Affordable Housing Provider [ ] Local resident [ ]	Land agent [ ] Developer [ ] Amenity/Community Group [ ] Other [ ]

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## 2. SITE DETAILS

Site address

THORNBURY GARDEN CENTRE  
MILBURY HEATH  
WOTTON-UNDER-EDGE  
GLOUCESTERSHIRE

Site Postcode

GL12 8QH

Grid ref. (if known)  
e.g. 367712,177756

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Site area (hectares)

3.72

Current use(s)

GARDEN CENTRE

Relevant Planning History  
(if known please include  
any relevant planning  
application reference  
number(s) and confirm if the  
site has previously been  
submitted in response to a  
call for sites for the PSP or  
other Local Plan process).

PREVIOUSLY SUBMITTED IN RESPONSE TO CALL FOR SITES (Site Ref: SHLAA229)

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### 3. PROPOSED FUTURE USES AND CAPACITY

Please indicate if the proposal is for 100% residential or a mixed use scheme (and if so the intended proportions and respective capacity of each use.)

Site suitable for 100% residential within the context of the current shortfall for housing. However site also considered suitable for employment purposes.

Please state how your proposal is proportional to the existing size and character of the settlement. E.g. % increase of existing settlement (Demographic data on existing settlement size is set out in the Rural Villages and Settlements Topic Paper (2015)

Site is located beyond any identified settlement assessed within the Rural Villages and Settlements Topic Paper 2015 however comprises a brownfield site and accordingly should be considered as part of the sequential assessment of future sites for the reasons outlined in our correspondence dated 9<sup>th</sup> December 2015.

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Please state how your proposal will address/contribute to the community aspirations established during previous consultation rounds of the PSP Plan and listed at Appendix 2 of the November 2015 PSP Plan consultation document

### 4. SITE OWNERSHIP AND STATUS

- I (or my client/organisation)
- Is sole owner of the site [ ]
- Owns part of the site [ ]
- Do not own the site [ ]

If you are not the owner, or only own part of the site, do you know who owns the site or the remainder of it (please provide details, including a plan showing site ownerships)

Our client has a leasehold interest in the site

Does the owner (or other owner(s) support your proposals for the site? [ X- ]

Is the land for sale? If so how long has it been on the market?

No

Are there any covenants or other legal issues that may restrict development potential? If so please explain. (including wayleaves and easements)

None known

Has the land been subject to developer interest e.g. initial interest, a feasibility appraisal, option agreement or contract to purchase? If so please provide details including the nature of the option agreement(s) and purchase contract(s).i.e. fixed / minimum value or subject to planning.

Not known

Have any utility searches been undertaken?

[ ]

If so is the site readily serviceable? Please provide details of which utilities are available to the site.

Existing garden centre benefits from all usual utilities

Have or are consultants engaged to undertake any studies or design work?

[N- ]

If so who and when? Please provide details. Please indicate if those studies may be made available to the Council?

Please indicate an approximate timescale for delivery (no. of dwellings per year):

2016/2017	2017/2018	2018/2019	2019/2020	2020/2021
		<u>tbc</u>	<u>tbc</u>	

2021/2022	2022/2023	2023+

**5. SITE CONSTRAINTS**

Has the highway authority been consulted? [N-]

If so please provide details, of when and any conclusions. Site benefits from existing highway access

Has any proposed scheme been financially appraised? [N-]

If so did the appraisal conclude that a development would be viable and provide a reasonable return to the landowner? [ ]

Can any assumptions and or the appraisal work be provided to the Council? [ ]

Have any soil investigations been undertaken? [N-]

If so was any significant contamination found or need for further investigations advised? Please provide details.

Is the site subject of a Local Green Space nomination or any other such designation? If so please provide details below.

No

*With regard general site constraints the Council retains significant information and expertise with regard these issues. The Council **does not** advise that such studies should be commissioned at this time if not already done so. Depending on the Council's initial considerations interested parties will be advised where necessary if and when additional study work should be undertaken to support a proposed allocation.*

Would the site impact on any landscape, ecological, archaeological or built heritage interests? Please provide use the box below to provide information of any such interests where known and the details of studies undertaken.

No

Is the site known to suffer from any flooding issues (river or drainage related)? Please provide details, and of any studies undertaken, in the box below.

No

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## 6. ADDITIONAL COMMENTS

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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.