

Our Ref: 5015/MC/eds
12th January 2017

Verity Britton
Programme Officer of the South Glos Policies, Sites and Places Plan
PO Box 299
Civic Centre
High Street
Kingswood
Bristol
BS15 0DR

Dear Verity

Regulation 24 of the Town and Country Planning (Local Planning)(England) Regulations 2012

Examination of the South Glos Policies, Sites and Places Plan

Representation ID: 231/1

We act on behalf of the Tortworth Estate Company (ID:231/1) and write in respect of the above examination. We have been advised of the Inspector's provisional Hearing Programme and we have been advised that the Inspector has invited us to participate in the Hearing Session in respect of Issue 1. We are grateful to have received that invitation.

I write to note that since our Client's submissions made at Regulation 20 stage, there has been significant progress made by the Council, and its Joint Spatial Plan (JSP) Partners, on the publication of a new strategic, overarching vision and framework to help deliver new homes and land for employment purposes identified to be required by 2036, and the supporting infrastructure, across the West of England. Significantly, that work updates the adopted South Gloucestershire Core Strategy and is founded upon a fresh evidence base of need. Particularly, in South Gloucestershire terms, that evidence base demonstrates a need for a step-change in planning policy in order to secure higher growth levels than those identified within the currently operative Core Strategy.

Furthermore, since our Client's earlier submissions, it is understood the Council has placed significant resources on the preparation of a new Local Plan, which is being prepared alongside the JSP. The Tortworth Estate Company is satisfied that the Council has, by commencing stakeholder and community engagement on that Local Plan, evidenced its commitment to rapidly move forward in the production of a plan that addresses the above noted requirements for a policy step-change.

In light of those developments, it is now our Client's position that its original submission made in respect of the matters identified by the PSPP Examination Inspector's Issue 1 are no longer pertinent.

It is noted that the Inspector's question 1b) highlights the Council has stated that if the PSPP is required to make housing allocations in order to be found



sound, it will withdraw the PSPP from the examination. It is our view that there is nothing inherently unlawful about the Council concluding to withdraw the emerging PSPP from examination. There would, however, be no positive consequences gained by the withdrawal of the plan. Indeed, it is our Client's opinion that the consequences of withdrawal would be significantly negative; in that the PSPP presents a broad range of development management policies to align with the development management requirements of the Framework – in a localised, South Gloucestershire, form. The omission of those emerging policies from the development plan framework would present a further vacuum to the Development Plan, to the detriment of the economic, social and environmental fabric of South Gloucestershire. The Tortworth Estate Company, being the custodian of circa 2,000 hectares of land within South Gloucestershire Council's area, places great value on the certainty gained by the publishing, and subsequent adoption, of those policies; specifically when meeting its social, economic and environmental stewardship responsibilities.

Those policies do not address matters of housing land supply and thus the question of needing to positively plan to meet the full, objectively assessed housing needs of the Council is not triggered. It's the Estate's view that an outright rejection of the PSPP could, until the new Local Plan is adopted, undermine the proper planning of the District and that there is little merit in recommending a suspension of the process in light of the resources being placed by the Council in the production of the new South Gloucestershire Local Plan. Moreover, the Examination of those policies at this point in time, in all probability, is likely to assist the Council in its fast tracking of its new Local Plan; in that it will be able to draw from freshly audited and examined development management policies.

In light of the above, the Tortworth Estate Company wishes to decline the Inspector's invitation to attend the Hearing Session in respect of Issue 1; unless, of course, the Inspector specifically requests the Estate's contribution to that Session.

Please do not hesitate to contact me should you, or the Inspector, require any amplification of the above, or have any further questions.

Yours sincerely



Mark Chadwick MRTPI
Senior Director
Hunter Page Planning