

Suggested Modifications - Proposed Submission Policies, Sites and Places (PSP) Plan June 2016

The Council is inviting comments on the Suggested Modifications to the submitted Policies, Sites and Places Plan (PSP Plan). The suggestions cover policies, supporting text, Local Green Space designations and the Policies Map.

All comments received by 7pm on the 6th January 2017 will be passed to the Inspector for consideration as part of the examination process.

The Suggested Modifications (including reference code) are available to view in this document:

- [Suggested Modifications \(November 2016\) to the Policies Sites and Places Plan Proposed Submission \(June 2016\) \(OS1\)](#)

Further details can be found in the following documents:

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Email:	planningLDF@southglos.gov.uk
Post:	Strategic Planning Policy & Specialist Advice Team Environment and Community Services Department PO Box 299 Civic Centre Bristol BS15 0DR

If you have any questions regarding this invitation to make comment or would like any further information, please contact the Strategic Planning Policy & Specialist Advice Team on 01454 863464.

Comments should only be submitted once i.e. by email or by post.

All comments must be received by no later than 7.00pm on 6th January 2016.

Receipt of your response will be acknowledged.

Please note that all comments must refer to the relevant suggested modifications reference, local green space reference or policy map.

PART ONE- YOUR DETAILS

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Your Details	Your Agent's Details (If applicable)
Reference No (if known*):	Reference No (if known*):
Title: Mr	Title: Mr / Mrs / Miss / Ms / Dr / Other:
Surname: Davis	Surname:
Forename: Paul	Forename:
Organisation / Company: Persimmon Homes Severn Valley	Organisation / Company:
Address: Davidson House, 106 Newfoundland Way, Portishead, Bristol	Address:
Postcode: BS20 7QE	Postcode:
Contact No: [REDACTED]	Contact No:
Email: [REDACTED]	Email:

*If you have been contacted by post, you will find your reference number at the top of the letter under 'Our Ref'

PART TWO - YOUR COMMENTS

Please use a separate form for each comment made.

Q1. To which suggested modifications does this comment relate?	
Suggested Modification - Policy Reference: (e.g. SM14)	SM3
Suggested Modification Local Green Space Reference: (e.g. LGS1234)	
Suggested Modification – Policy Map Reference: (e.g. MAP14)	

For guidance on 'legal compliance' and 'soundness' please see the guidance note available from www.southglos.gov.uk/PSPsubmission.

Q2a. Do you consider the suggested modification is legally compliant
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Q2b. Do you consider the suggested modification is sound?
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Yes, with minor changes <input type="checkbox"/> No

Q3. On what grounds do you consider the modification is <u>unsound</u>? Is it because it is <u>not</u>:
<input type="checkbox"/> Positively Prepared?
<input type="checkbox"/> Justified?
<input checked="" type="checkbox"/> Effective?
<input type="checkbox"/> Consistent with National Policy?

Q4. Please set out what change(s) you consider necessary to make the suggested modification legally compliant or sound. Please be as precise as possible.
Your suggested change should have regard to the test you have identified at Q3 above where this relates to soundness. You should state why this change will make the Policies, Sites and Places Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.
SM3 – Policy PSP2 – Landscape
It is not clear how the second bullet point of the proposed modification will be applied. If it is applied on a Council-wide basis, given the wide range of different landscapes within South Gloucestershire, it is likely that reasonable alternative proposals achieving similar benefits but with less harm to the landscape could be justified for most development proposals. For example, in assessing a housing proposal there could be alternative locations which would meet the public

benefit test of meeting housing needs, but not in the same area as the housing needs that the particular proposal would address.

If the test is to be retained, Persimmon Homes Severn Valley consider it should be applied in a more local context, relevant to the development proposal, to avoid it being used as a blanket policy for resisting development. This should be made clear both in the policy itself and with further guidance in the supporting text. We therefore suggest a similar approach to that in Policy PSP3, where development which would result in the loss of trees and woodlands in that case, will be acceptable, where the need for, and benefits of, the development in that location clearly outweigh the loss or damage (our emphasis).

Change Required

Amend bullet point 2 to read:

'There is no other reasonable alternative proposal in that location which achieves similar public benefits, but which has less harm to the landscape; and' (change underlined).

Please continue on a separate sheet if necessary

Q5. Do you consider it necessary to participate at the oral part of the examination?

- No, I do not wish to participate at the oral examination
- Yes, I wish to participate at the oral examination

Q6. If you wish to participate, please outline why you feel it is necessary to participate at the oral part of the examination.

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To protect the commercial interests of Persimmon Homes Severn Valley.

Please continue on a separate sheet if necessary

Q7. Please indicate which, if any, of the following you wish to be notified about.

- the publication of the recommendations of the independent Inspector
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Please indicate as appropriate

Signature:

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Postcode: BS20 7QE	Postcode:
Contact No: [REDACTED]	Contact No:
Email: [REDACTED]	Email:

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PART TWO - YOUR COMMENTS

Please use a separate form for each comment made.

Q1. To which suggested modifications does this comment relate?	
Suggested Modification - Policy Reference: (e.g. SM14)	SM54
Suggested Modification Local Green Space Reference: (e.g. LGS1234)	
Suggested Modification – Policy Map Reference: (e.g. MAP14)	

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SM54 – Policy PSP42 – Custom-Build Dwellings
Persimmon Homes Severn Valley note that our previous comments on the policy have not resulted in any proposed modifications. However the modifications that are proposed make the position even worse. Proposed paragraph 8.53a requires self-built plots to be serviced early in the delivery programme and offered ahead of standard products. It is unreasonable to expect developers to provide upfront servicing of a site and then in addition make self-build plots available ahead of any market housing which is relied upon to produce returns on the upfront

servicing costs and this approach will adversely affect viability. Equally, it is unrealistic to expect self-built plots to be provided early where it will affect the marketing strategy for the site with non-standard products provided in the first phase.

Change Required

In addition to modifications previously suggested delete paragraph 8.53a.

Please continue on a separate sheet if necessary

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Suggested Modification Local Green Space Reference: (e.g. LGS1234)	
Suggested Modification – Policy Map Reference: (e.g. MAP14)	

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SM28 – Policy PSP37 – Internal Space and Accessibility Standard for Dwellings
Persimmon Homes Severn Valley consider the modification results in a substantial change in the policy requirements from a requirement relating to all units to a requirement limited to specific units. Therefore, and for the avoidance of doubt, the modification should be included in criterion (iii) of the policy, rather than as an amendment to the supporting text.
Our previous objections to the policy are maintained.

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Q1. To which suggested modifications does this comment relate?	
Suggested Modification - Policy Reference: (e.g. SM14)	SM25
Suggested Modification Local Green Space Reference: (e.g. LGS1234)	
Suggested Modification – Policy Map Reference: (e.g. MAP14)	

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SM25 – Policy PSP17 – Heritage Assets and the Historic Environment
Persimmon Homes Severn Valley support the proposed modifications, but consider the additional change we originally suggested should also be included. This was to reword the fourth bullet point of the last part of the policy to read ' <i>and/or the provision of heritage enhancements</i> ' on the basis that it may not always be necessary to do both.
<i>Please continue on a separate sheet if necessary</i>

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Suggested Modification - Policy Reference: (e.g. SM14)	SM23
Suggested Modification Local Green Space Reference: (e.g. LGS1234)	
Suggested Modification – Policy Map Reference: (e.g. MAP14)	

For guidance on 'legal compliance' and 'soundness' please see the guidance note available from www.southglos.gov.uk/PSPsubmission.

Q2a. Do you consider the suggested modification is legally compliant
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Q2b. Do you consider the suggested modification is sound?
<input type="checkbox"/> Yes <input type="checkbox"/> Yes, with minor changes <input checked="" type="checkbox"/> No

Q3. On what grounds do you consider the modification is <u>unsound</u>? Is it because it is <u>not</u>:
<input type="checkbox"/> Positively Prepared?
<input type="checkbox"/> Justified?
<input checked="" type="checkbox"/> Effective?
<input type="checkbox"/> Consistent with National Policy?

Q4. Please set out what change(s) you consider necessary to make the suggested modification legally compliant or sound. Please be as precise as possible.
Your suggested change should have regard to the test you have identified at Q3 above where this relates to soundness. You should state why this change will make the Policies, Sites and Places Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.
SM23 – Policy PSP16 – Parking Standards
A number of comments were submitted on the soundness of this policy previously, in particular relating to the lack of justification for the establishment of minimum residential parking standards and the resulting conflict with the NPPF. The Council's response to these comments is proposed modification SM23. However, Persimmon Homes Severn Valley consider this is insufficient. The justification relates solely to car ownership levels and therefore continues to look at parking standards in isolation, whereas NPPF39 requires Local Planning Authorities to take into account <u>all</u> the following if setting parking standards for both residential and non-residential development:

- The accessibility of the development;
- The type mix and use of development;
- The availability of and opportunities for public transport;
- Local car ownership levels; and
- Overall need to reduce the use of high-emission vehicles.

The proposed paragraph 5.68A merely assesses Council-wide car ownership levels against national levels. We consider that on its own this does not justify provision of an inflexible Council-wide minimum residential parking standard in a formal policy. There will be wide differences in car ownership levels between the urban areas, new residential developments and villages which need to be taken into account. NPPF39 then sets out other considerations which could also affect the need for parking, particularly accessibility and public transport levels. The Council should also assess the impact of parking on the character of the area and the effect on highway safety.

We accept that these issues are difficult to assess at the Local Plan level. We consider that it is more appropriate that a detailed assessment should be undertaken at the planning application stage for each proposal, through the preparation of a Transport Assessment, which is likely to be required for most of development defined as '*major*' anyway. However, by including detailed standards in a formal policy does not provide the necessary flexibility to enable such an approach to be applied. It also raises another anomaly with the Council's approach which includes standards both in the policy and in a schedule. This is in contrast to the approach taken by nearby Local Authorities in recently prepared/ adopted Local Plans;

- Stroud Local Plan Delivery Policy EL12 refers to Parking Standards within an Appendix, but allows developers '*to justify their own parking provision with evidence accompanying any planning application*' (plan adopted November 2015);
- North Somerset Development Management Policies Plan, Policy DM28, refers to a separate Planning Standards SPD and in cases where there are no specific standards it enables provision to be assessed according to individual circumstances, having regard to the transport objectives of the Council (plan adopted July 2016);
- Bath and North East Somerset Place-making Plan, Policy ST7 requires '*an appropriate level of on site servicing and vehicle parking*' and sets out standards in two schedules (Inspector's final report awaited).

In contrast South Gloucestershire includes some standards in Policy PSP18 and others in Schedule B. It would be clearer and preferable for the plan to adopt the consistent approach in the examples above, by including all the standards in the schedule referenced against a general policy which allows proposals to be assessed according to certain circumstances through a Transport Assessment submitted with individual planning applications.

Changes Required

1. Delete first sentence of Policy PSP16.
2. Add 'New development proposals will be acceptable where an appropriate level of on site cycle and vehicle parking is provided in accordance with the cycle parking standards set out in Schedule A and Parking Standards in Schedule B, unless a different level of provision can be justified by Local or Site Specific circumstances.
3. Incorporate the section on cycle standards and Part 1 in Schedule A.
4. Incorporate the remainder of the policy including Parts 2, 3, 4 and 5 and the definitions in Schedule B.

Please continue on a separate sheet if necessary

Q5. Do you consider it necessary to participate at the oral part of the examination?

- No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

Q6. If you wish to participate, please outline why you feel it is necessary to participate at the oral part of the examination.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

To protect the commercial interests of Persimmon Homes Severn Valley.

Please continue on a separate sheet if necessary

Q7. Please indicate which, if any, of the following you wish to be notified about.

the publication of the recommendations of the independent Inspector

the adoption of the Plan

Please indicate as appropriate

Signature:

Date:

05.01.2017

Thank you for your time to complete and return this comment form.
Please keep a copy for future reference.

All comment must be received by no later than 7.00pm on 6th January 2016.

Suggested Modifications - Proposed Submission Policies, Sites and Places (PSP) Plan June 2016

The Council is inviting comments on the Suggested Modifications to the submitted Policies, Sites and Places Plan (PSP Plan). The suggestions cover policies, supporting text, Local Green Space designations and the Policies Map.

All comments received by 7pm on the 6th January 2017 will be passed to the Inspector for consideration as part of the examination process.

The Suggested Modifications (including reference code) are available to view in this document:

- [Suggested Modifications \(November 2016\) to the Policies Sites and Places Plan Proposed Submission \(June 2016\) \(OS1\)](#)

Further details can be found in the following documents:

- [Appendix I – Suggested Modifications PSP Plan \(November 2016\) \(OS1a\)](#),
- [Appendix II - Suggested Modifications Local Green Space Designation \(November 2016\) \(OS1b\)](#), and
- [Appendix III Suggested Modifications \(November 2016\) to Policies Map Changes \(June 2016\) \(OS1c\)](#)

All these documents can be viewed online at: www.southglos.gov.uk/PSPsubmission

Making Comments

All comments should be made using this response form below. A [guidance note](#) for completing this form is available from: www.southglos.gov.uk/PSPsubmission. Completed forms should be submitted to the Council using the contact details below.

Email:	planningLDF@southglos.gov.uk
Post:	Strategic Planning Policy & Specialist Advice Team Environment and Community Services Department PO Box 299 Civic Centre Bristol BS15 0DR

If you have any questions regarding this invitation to make comment or would like any further information, please contact the Strategic Planning Policy & Specialist Advice Team on 01454 863464.

Comments should only be submitted once i.e. by email or by post.

All comments must be received by no later than 7.00pm on 6th January 2016.

Receipt of your response will be acknowledged.

Please note that all comments must refer to the relevant suggested modifications reference, local green space reference or policy map.

PART ONE- YOUR DETAILS

Please be aware that anonymous forms cannot be included and that in order for you to submit your form you **must** include your details below.

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.

Should you wish to make more than one comment, please submit a separate form for each in Part Two below clearly stating which suggested modification, Local Green Space Designation or Policy Map change you wish to comment on. (N.B. You only need to complete Part One (Your Details) once)

In circumstances where there are individuals/ groups/ organisations who share a similar view as to how the plan should change, it would be helpful if individuals/ groups/ organisations make a single response. It would also be useful if the group/ organisation state how many people the submission is representing and how the comment was authorised.

Your Details	Your Agent's Details (If applicable)
Reference No (if known*):	Reference No (if known*):
Title: Mr	Title: Mr / Mrs / Miss / Ms / Dr / Other:
Surname: Davis	Surname:
Forename: Paul	Forename:
Organisation / Company: Persimmon Homes Severn Valley	Organisation / Company:
Address: Davidson House, 106 Newfoundland Way, Portishead, Bristol	Address:
Postcode: BS20 7QE	Postcode:
Contact No: [REDACTED]	Contact No:
Email: [REDACTED]	Email:

*If you have been contacted by post, you will find your reference number at the top of the letter under 'Our Ref'

PART TWO - YOUR COMMENTS

Please use a separate form for each comment made.

Q1. To which suggested modifications does this comment relate?	
Suggested Modification - Policy Reference: (e.g. SM14)	SM11
Suggested Modification Local Green Space Reference: (e.g. LGS1234)	
Suggested Modification – Policy Map Reference: (e.g. MAP14)	

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SM11 – Policy PSP6 – On Site Renewable and Low Carbon Energy
Our previous support for the policy in principle was on the basis that it included a Energy Hierarchy and we put forward further suggested improvements to the hierarchy. The affect of the proposed amendments to remove the hierarchy for major development, by making it a requirement to reduce CO2 emissions further by reference to a minimum standard of at least 20%. Previously the achievement of CO2 emissions was in the context of, and in accordance with

the hierarchy, without a specific standard, rather than as a specific requirement in addition to the hierarchy.

Persimmon Homes Severn Valley therefore consider the proposed amendment reduces the flexibility of the policy to deliver appropriate improvements and our previous comments still apply.

Please continue on a separate sheet if necessary

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Please indicate as appropriate

Signature:

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