

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 / Mrs / Miss / Ms / Dr / Other:	Title: Mr / Mrs / Miss / Ms / Dr / Other:
Surname:	Surname: Roberts
Forename:	Forename: Peter
Organisation / Company: Barratt Homes	Organisation / Company: Barton Willmore
Address: c/o Agent	Address: 101 Victoria Street Bristol
Postcode:	Postcode: BS1 6PU
Contact No:	Contact No: [REDACTED]
Email:	Email: [REDACTED]

*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)	PSP 2
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

Yes No

Q2b. Do you consider the suggested modification is sound?

Yes Yes, with minor changes No

Q3. On what grounds do you consider the modification is unsound? Is it because it is not:

- Positively Prepared?
- Justified?
- Effective?
- 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.

We support the addition of 'Special' to the requirement for proposals to conserve the landscape character of development proposals. Clearly some landscape features are of greater importance than others and it is right that the policy now reflects this.

We however object to the addition of the three bullet points against which development proposals will be judged. The suggestion within these bullet points is that all developments that would result in any harm to the landscape would need to meet these tests. As development defacto changes the landscape it can be seen to result in harm to the landscape. Therefore the

tests against which this harm will be assessed need to be absolutely clear. This is not currently the case and as such the Policy as drafted is not effective.

The first test is a suggestion that the proposed development results in public benefits that outweigh the harm. This policy appears to be using the same criteria as supported through the NPPF para 134; however, under very different circumstances. Paragraph 134 of the NPPF relates only to designated heritage assets, whereas the Council's proposed test for landscape impact relates to any landscape, no matter what its value. The NPPF suggests no such test for landscape impacts and is therefore not consistent with national policy.

The second bullet suggests that it must be demonstrated that "there is no other reasonable alternative proposed which achieves similar public benefits, but with less harm to the landscape". This test is unclear as to what the criteria for the assessment of reasonable alternatives are, and whether this relates only to alternative ways of developing the site which is the subject of the development proposals, or a wider assessment. Either way, there is no justification for this approach. If a development proposal is acceptable it should be judged on its merits and not against potential alternatives. The policy is therefore not effective or justified.

In order to make this policy sound the additional criteria added need to be altered or removed. At the very least they should be relevant only when referring to development proposals that result in significant harm to the landscape or in areas of designated landscape. The second additional bullet should be amended to make it clear it relates only to the site on which the development proposal is submitted and, where the harm is less than significant should not require alternative proposals to be considered.

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 expand on the point made above

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:

Pe  Homes

Date:

6/1/17

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.