

Gladman Developments Limited
South Gloucestershire
Policies Sites and Places Plan
Suggested Modifications

December 2016



CONTENTS

1	Introduction	3
1.1	Context	3
2	Suggested Modifications.....	4
2.1	Modification SM3.....	4
2.2	Modification SM15	4
2.3	Modification SM26	4

1 INTRODUCTION

1.1 Context

1.1.1 Gladman Developments specialise in the promotion of strategic land for residential development with associated community infrastructure. This submission provides Gladman Developments' representations on the South Gloucestershire Policies Sites and Places Plan Suggested Modifications.

1.1.2 Through this submission, Gladman have highlighted a couple of issues with the Modifications which may need further amendment to make them compliant with national policy.

1.1.3 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified** – The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base;
 - **Effective** – The plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - **Consistent with National Policy** – The plan should enable the delivery of sustainable development in accordance with the policies in the Framework.
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2 SUGGESTED MODIFICATIONS

2.1 Modification SM3

- 2.1.1 Gladman object to Suggested Modification SM3 as it is contrary to the Framework.
- 2.1.2 The Modification proposes that where development proposals would cause harm to the landscape it must be clearly demonstrated that there is no other reasonable alternative proposal which achieves similar public benefits, but with less harm to the landscape.
- 2.1.3 This Modification seeks to introduce a sequential approach to development locations which is not supported by any guidance within the Framework. The Framework is clear that development which is sustainable should go ahead without delay. The use of a sequential approach to arbitrarily restrict suitable development from coming forward, potentially on the edge of settlements, would not accord with the positive approach to growth required by the Framework. In addition, impact upon the landscape should be a matter that should be weighed in the planning balance against the need to significantly boost the supply of housing and the other benefits of a particular scheme.
- 2.1.4 The policy needs to be flexible enough to be able to accommodate new development, potentially outside of existing development boundaries, to allow the Council to quickly address any issues with a shortfall in housing land supply against the plan requirement, through the development plan.
- 2.1.5 Landscape harm may well be able to be mitigated and any residual harm which is identified as part of any proposal, simply should be weighed in the planning balance against the benefits of the proposal.
- 2.1.6 Bullet point 2 of the Suggested Modification (SM3) should therefore be deleted in order to ensure that the Policy is Framework compliant, otherwise, as proposed for amendment, the Policy is unsound.

2.2 Modification SM15

- 2.2.1 Gladman support the Suggested Modification (SM15) as it brings the Policy in line with the guidance set out in para 32 of the Framework.

2.3 Modification SM26

- 2.3.1 Gladman continue to object to Policy PSP19 as Suggested Modification 26 does not go far enough to address our concerns. Policy PSP19 introduces a sequential test comparable to that contained in Suggested Modification SM3. The second paragraph of the policy relates to proposals avoiding harm to local biodiversity by locating them on an alternative site which is less harmful. This is clearly contrary to the guidance set out in the Framework for the same reasons as outlined above in Section 2.1.
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