

ETP.1066 - Representations on behalf of Barratt (Bristol) Ltd
and David Wilson Homes (South West) Ltd
5th January 2017



Earlsfield House
Kewstoke Road
Kewstoke
Weston-super-Mare
BS22 9YF

Strategic Planning Policy & Specialist Advice Team
Environment and Community Services Department
PO Box 299
Civic Centre
Bristol
BS15 0DR

By Email: PlanningLDF@southglos.gov.uk

Dear Sir/Madam

**OS1 Suggested Modifications November 2016
South Gloucestershire Local Plan: Policies, Sites and Places Plan
Representations of Barratt (Bristol) Ltd and David Wilson Homes (South West) Ltd**

I am instructed by Barratt (Bristol) Ltd and David Wilson Homes (South West) Ltd to make representations to the Suggested Modifications to the submission South Gloucestershire Local Plan: Policies, Sites and Places Plan.

The representations should be read in conjunction with those previously made on behalf of our clients and are an objection to;

- SM23 – Policy PSP16;
- SM52 – Policy PSP37; and
- SM55 – Policy PSP43.

The representations are attached on individual forms as requested.

Please do not hesitate to contact me if you wish to discuss any of the above representations.

Yours sincerely

**Rob Duff
Director**

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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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.

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Receipt of your response will be acknowledged.

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Postcode:	Postcode: BS22 9YF
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)	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 checked="" type="checkbox"/> Positively Prepared?
<input checked="" type="checkbox"/> Justified?
<input checked="" type="checkbox"/> Effective?
<input checked="" 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 does not address my client's objections to proposed Policy PSP16. Suggested Modification SM23 proposes further justification for increasing Car Parking provision in the form of paragraphs 5.68A and 5.68B. I refer only to the former. 5.86A seeks to justify the need for additional car parking by comparing census data between the 2001 and 2011 censuses, and between South Gloucestershire and National figures, in the following manner;

1. An increase from 1.4 cars per household to 1.5 cars per household in South Gloucestershire from 2001 to 2011;

The addition of 0.1 car per household does not justify any increase in car parking provision. The statement is not supported by an assessment of whether car parking provision is adequate at 1.4 or 1.5 cars per household.

The figure is also presented without any assessment of how the composition of house sizes within South Gloucestershire has changed from 2001 to 2011. The 0.1 increase could simply be because of more larger houses than smaller houses having been built since 2001, changing the makeup of the housing stock.

The figure is also only presented to one decimal place. The difference could therefore be more negligible than even the tiny 0.1.

Without any assessment to support the statement, the 1.5 cars per household figure is meaningless.

2. In South Gloucestershire 44.7% of households have more than 2 cars, whereas nationally the figure is only 32.1%

South Gloucestershire is a rural area where investment in public transport has, for decades, been inadequate. The percentage of households with 2 plus cars is higher in all rural areas than in urban areas.

All this statistic illustrates is that South Gloucestershire has a two plus car ownership figure that one would expect: It in no way justifies any increase in car parking provision.

3. In South Gloucestershire 13.1% of households have no cars, whereas nationally the figure is 26.5%.

The fact that rural South Gloucestershire has fewer households with no cars than in England and Wales as whole is again as one would expect for a rural district and is similar to other rural districts across the country. It in no way proves any need for additional car parking provision.

Of greater relevance is the fact that South Gloucestershire has one of the lowest growths in households with cars in England and Wales, with only a 0.4% increase from 2001 to 2011 (ONS).

Compared to similar rural areas, the number of households with cars is growing exceptionally slowly in South Gloucestershire. The increase in the number of households with cars in similar districts in the south west are;

- North Somerset: 1.2%
 - South Somerset: 1.6%
 - West Somerset: 1.8%
 - Mendip: 1.8%
 - Stroud: 2.8%
- (ONS)

Excluding the London Boroughs, of all 348 local authorities in England and Wales, only 6 have a lower growth rate in the number of households with cars, being the urban areas of Bournemouth (1.0%), Pool (0.3%), Woking (0.1%) and Wokingham (0.3%), along with the neighbouring urban area of Bristol (0.1%) and Bath and North East Somerset (0.1%). (ONS)

In addition, one should also look at the different planning regimes in place in 2001 and compared to 2011 to assess whether provision is adequate. In 2001 the regime was under PPG3, which sought a maximum provision of 1.5 cars per home across any development. Provision was therefore very low and it was fair to argue that developments were built with insufficient car parking.

Current parking standards massively exceed the 1.5 spaces per dwelling figure, and no evidence is presented to indicate that they are insufficient and are causing harm.

South Gloucestershire Council has failed to examine whether the current car parking provision causes any harm, and then assess that against the harm that would be caused by adding to development costs, the resultant increase in house prices and the resultant increase in land needed for housing if the car parking requirement were increased.

The Council has also failed to assess the cumulative harm that would be caused by increasing car parking provision, increasing housing size and increasing garden size required by proposed policies PSP16, PSP37 and PSP43, upon the cost of delivering homes and the land needed to do so. It is for the Council to justify the change in policy, which they have failed to do.

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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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:

6th January 2017

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PART TWO - YOUR COMMENTS

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Suggested Modification - Policy Reference: (e.g. SM14)	SM52
Suggested Modification Local Green Space Reference: (e.g. LGS1234)	
Suggested Modification - Policy Map Reference: (e.g. MAP14)	

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<input type="checkbox"/> Yes <input type="checkbox"/> Yes, with minor changes <input checked="" type="checkbox"/> No

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SM52 does not address my client's objections to proposed Policy PSP37. Firstly, the paragraph should read 'M4(2) Wheelchair accessible' and not 'M4(3)': A simple typo. Secondly, modification SM52 could be interpreted in many ways and as such is not precise or clear. It could be interpreted to mean;

1. The 8% of affordable housing required to be M4(3) wheelchair adaptable and M4(2) wheelchair accessible dwellings only applies where the Local Authority is responsible for allocating or nominating a person to live in that dwelling; or
2. The 8% required for only M4(2) wheelchair accessible dwellings only applies where the Local Authority is responsible for allocating or nominating a person to live in that dwelling, but applies elsewhere to affordable housing required to be M4(3) wheelchair adaptable; or
3. The 8% of affordable housing required to be M4(3) wheelchair adaptable and M4(2) wheelchair accessible dwellings is only negotiable where the Local Authority is responsible for allocating or nominating a person to live in that dwelling; or
4. The 8% of affordable housing required to be M4(2) wheelchair accessible dwellings is only negotiable where the Local Authority is responsible for allocating or nominating a person to live in that dwelling but is not negotiable for affordable housing required to be M4(3) wheelchair adaptable.

Having discussed this with Council Officers, it seems that 1. above is the interpretation intended. A simple amendment to wording should address this objection.

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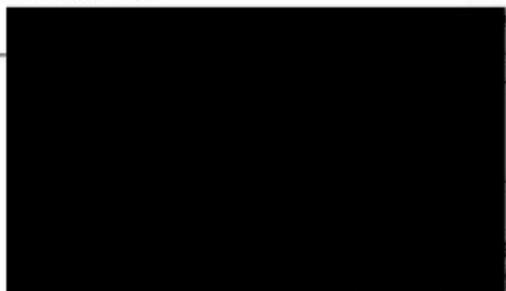
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Signature:



Date:

6th January 2017

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future reference.