

Policies, Sites and Places (PSP) Plan - Main Modifications Representations Form

12th June – 24th July 2017

The Main Modifications (including reference code) are available to view in on the consultation website at www.southglos.gov.uk/PSPmodifications

Representations should only be made on the **Main Modifications** and should be made using the form below. A guidance note for completing this form is available from: www.southglos.gov.uk/PSPmodifications. Completed forms should be returned to:

Email:	planningpolicy@southglos.gov.uk
Post:	South Gloucestershire Council Department for Environment and Community Services Strategic Planning Policy & Specialist Advice Team PO Box 1954 Bristol BS37 0DD

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

All representations must be received by no later than 24th July 2017 at 7pm.

Receipt of your representations will be acknowledged.

Please note that all representations must refer to the relevant Main modifications reference.

PART ONE- YOUR DETAILS

Please be aware that anonymous forms cannot be assessed by the Inspector, therefore representation forms **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 representation, please submit a separate form for each in Part Two below clearly stating which Main Modification 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, 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: Kosaner
Forename:	Forename: Cem
Organisation / Company: Redrow Homes (South West) Limited	Organisation / Company: Lichfields
Address: Redrow House West Point Great Park Road Bradley Stoke Bristol	Address: Lichfields Helmont House Churchill Way Cardiff
Postcode: BS32 4QG	Postcode: CF10 2HE
Contact No:	Contact No: ██████████
Email:	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 REPRESENTATIONS

Please use a separate form for each representation.

Q1. To which main modifications does this representation relate?	
Main Modification Reference: (e.g. MM14)	MM30 – Local Greenspace Designation LGSD1219

For guidance on 'legal compliance' and 'soundness' please see the guidance note available from www.southglos.gov.uk/PSPmodifications .	
Q2a. Do you consider the Main Modification is legally compliant	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Q2b. Do you consider the Main Modification is sound?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Yes, with minor changes <input type="checkbox"/> No	

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

Q4. Please set out what change(s) you consider necessary to make the Main 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.
<p>We provide comments on behalf of our client, Redrow Homes (South West) Limited. The comments are with specific reference to Charlton Common and the removal of its proposed designation as a Local Greenspace (Previous Reference: LGSD1210).</p> <p>We welcome and support Charlton Common being removed as a proposed Local Greenspace Designation (LGD) as part of the main modifications to the PSP Plan. As we set out in our previous representations and during the examination hearing session, we consider that the proposed designation of Charlton Common as a local greenspace would render the PSP unsound on the basis that it is neither 'effective' nor 'justified'.</p> <p>As you are aware, the Council has resolved to grant our client planning permission for a scheme of 80 residential units that form part of the Cribbs Patchway New Neighbourhood (CPNN), subject to a S106</p>

agreement (Ref: PT15/4165/F). Our client is currently working with the Council to finalize the drafting of the S106 with a view to permission being issued in the near future.

Our client's proposals under application PT15/4156/F include a management regime to bring Charlton Common back into beneficial use, with a particular emphasis on delivering recreational value. As it stands, this includes managing areas of bramble and scrub, providing mowed walkways and various planting. However, in the future it could also extend to the introduction of naturalistic play equipment and the delivery of more permanent recreational routes.

The above would be in keeping with the Council's wider aspirations for Charlton Common to form part of a green infrastructure corridor that serves the wider CPNN. This has been confirmed through the adopted Core Strategy (ref no.PP2) and is reflected in the CPNN SPG.

NPPF paragraph 76 confirms that Local Green Space designation would rule out new development other than in very special circumstances. Such development could include new recreational opportunities such as an equipped play space and formal recreational routes. As the entirety of Charlton Common is owned by our client, planning permission would be required for most works seeking to enhance the recreational value of the Common. We consider that the proposed designation as Local Green Space would present a significant policy hurdle that may prove insurmountable and therefore stifle the aspirations the Council has for the Common which are reflected in the adopted Core Strategy and the CPNN SPG.

In addition, Charlton Common is already afforded special protection by way of the Commons Act 2006 and is therefore singled out for special consideration at the highest level. Applying to undertake works to a Common is therefore a stringent and onerous process, with the application to be assessed by the Secretary of State. Such applications require extensive engagement with stakeholders, with decisions affecting the future of the Common determined through an inclusive process. Consequently, a Local Greenspace Designation would not afford Charlton Common any greater protection than that currently provided under its designation as a Common. As such, no local benefit would be gained by designation as a Local Green Space and therefore its designation would be unjustified.

It is therefore entirely appropriate that Charlton Common is omitted as a Local Greenspace Designation in the emerging Plan.

Please continue on a separate sheet if necessary

Q5. 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:

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

All representations must be received by no later than 24th July 2017 at 7pm.