

## 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](http://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](http://www.southglos.gov.uk/PSPmodifications). Completed forms should be returned to:

Email:	<a href="mailto:planningpolicy@southglos.gov.uk">planningpolicy@southglos.gov.uk</a>
Post:	<b>South Gloucestershire Council</b> <b>Department for Environment and Community Services</b> 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 24<sup>th</sup> 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.

<b>Your Details</b>	<b>Your Agent's Details (If applicable)</b>
Reference No (if known*):	Reference No (if known*):
Title: Mr / Mrs / Miss / Ms / Dr / Other: Councillor	Title: Mr / Mrs / Miss / Ms / Dr / Other:
Surname: PERKINS	Surname:
Forename: ANDY	Forename:
Organisation / Company: South Glos Council	Organisation / Company:
Address:  Civic Centre, Kingswood	Address:
Postcode: BS15 9TR	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 REPRESENTATIONS**

Please use a separate form for each representation.

<b>Q1. To which main modifications does this representation relate?</b>	
<b>Main Modification Reference:</b> (e.g. MM14)	<b>MM30</b>

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

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

<b>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.</b>
<b>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.</b>
As part of the Examination process we (local councillors for Woodstock ward) sent in comments relating to Local Green Space LGSD413. In these comments we argued on a number of grounds against an 11 <sup>th</sup> -hour change to map, viz; the removal of a 15m buffer, not least that we, as local members, had not been consulted at all about this despite having met with council officers in September 2016 to go through the objections of council officers to spaces we had nominated. Therefore, as part of the Examination process, we submitted comments to make the Inspector aware of the irregular manner in which an officer-promoted removal of this 15m buffer had come about and the spurious reasoning behind it.
Now that the mass of documentation arising from the Examination has been published (e.g. the Main Modifications) we were expecting to see some commentary from the Inspector as to whether she agreed or not with our objection to the removal of this 15m buffer from LGSD413. Having not been able to find any such comments amongst the mass of documentation, we have queried with officers where we might find such. In response we have been told that " <i>The Local Green Space Designation was discussed at the hearing session on the 8th February 2017, the Inspector was aware and asked about the inclusion</i>

*of the 15m buffer. The Inspector provided a note of the final hearing day, which details the steps to produce the Main Modifications and her consideration of the issues before her. Following this she issued her 'Post Hearing Advice' on the 17th March 2017. Neither of these documents specifically detail the Inspector's view on the 15m buffer, however, she provided no instruction that the buffered spaces should be amended further or removed from [not] being designated.*

*The Main Modifications have been prepared in response to the Inspector's initial conclusions about what changes will be necessary to make the plan sound, following all the hearing sessions. As yet the Inspector has not issued or finalised her report and will do so following the consideration of the representations to the Main Modifications consultation.*

*Should you wish to comment again, regarding the Main Modifications, please can you use the representation form available from this page: [www.southglos.gov.uk/PSPmodifications](http://www.southglos.gov.uk/PSPmodifications)."*

In the absence of any commentary from the Inspector one way or another as to whether she agrees with our objection about the 15m buffer, we have no choice but to send-in again our OBJECTION as we do not believe that the way in which officers have changed OUR suggested designation WITHOUT so much as a single word to us cannot be regarded as being "Positively Prepared". Furthermore, the officer reasoning that this strip of land would somehow conflict with future strategic transport infrastructure projects is entirely spurious as there are no plans in this area and, therefore, the removal of this buffer must mean that the officer removal is not "Justified" or "Effective".

For completeness, we repeat our OBJECTION below. The 15m buffer needs to be reinstated into LGSD413 and only when it is do we believe the PSP plan will be legally compliant and sound.

Original comments as follows;

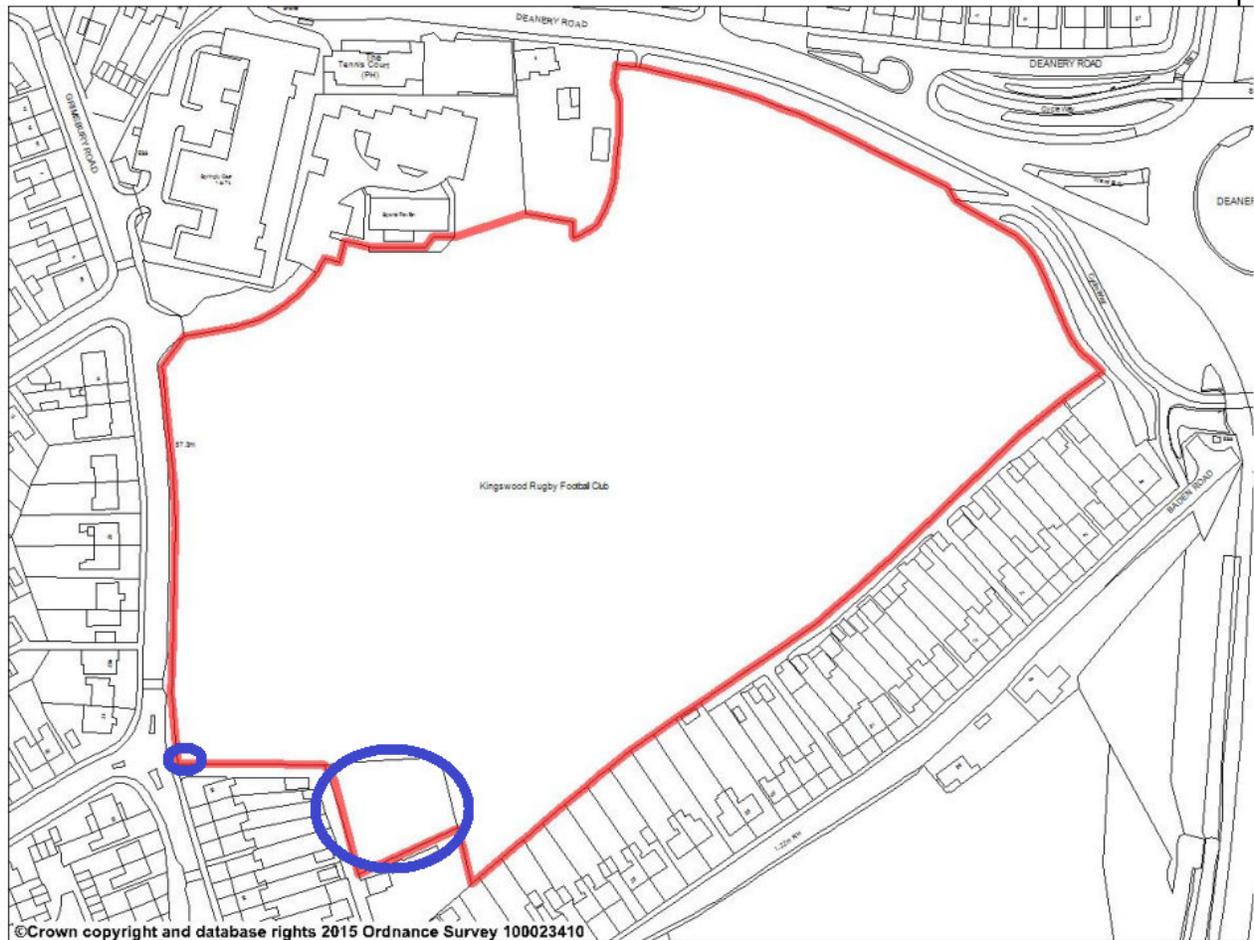
According to Representation Number 'SGC (*Transport*)' in the Council's document 'OS4 - Local Green Space Designation Topic Paper (November 2016)', the amendment that has been made to the map (in document 'OS1c - *Appendix III – Suggested Modifications (November 2016) to Policies Map Changes (June 2016)*') – viz. the removal of a '15m buffer' – has been done because "*The designation of the LGS adjacent the main road would potentially conflict with future strategic transport infrastructure projects and therefore the designation of the LGS should be would be [sic] contrary to the NPPF to ensure sustainable development beyond the plan.*"

As local members for the area we OBJECT to this amendment (i.e. removal of the 15m buffer) on the following grounds.

- a) We have not been consulted at all about this. This is despite having met with officers in early September to go through the objections of internal council departments to the nomination of spaces we had made.
- b) Nobody has ever made us aware of any possible 'future strategic transport infrastructure projects' in our area let alone anything that would involve having to sacrifice a slice of a local playing field.
- c) We cannot see how a 15m buffer would support any form of transport infrastructure other than perhaps some sort of lay-over area for buses. Whilst a buffer like this would facilitate the widening of the road – if that is what is intended by those who have a vision that they have not shared with us – it would only do so for a short section of road as the buffer is sandwiched between dwellings at the western (Deanery Road) and south-eastern (Baden Road) ends.
- d) There is no indication that Kingswood Rugby Club – who lease the playing field from the council and look after its maintenance – have been consulted about the potential loss of this 15m buffer. As that area includes part of their training area they ought to have been consulted.

We, therefore, OBJECT, to the removal of the 15m buffer from the map and restate our nomination as originally made for the whole field as set-out in the map below with the exception of the areas ringed with blue circles as the larger one is a square-ish parcel of land with planning permission and the smaller one is the site of small sub-station.

Green Space Code	Name of Nominated Space	Ward
LGSD413	Grimsbury Road Playing Field	Woodstock Ward



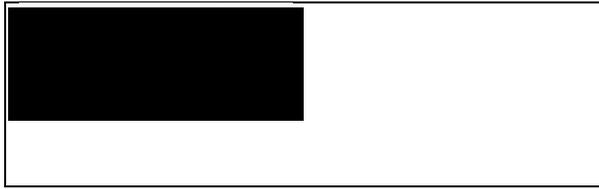
*Please continue on a separate sheet if necessary*

**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:

A rectangular box with a black border. The top portion of the box is filled with solid black, redacting the signature. The bottom portion of the box is empty.

Date:

20<sup>th</sup> June 2017

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 24<sup>th</sup> July 2017 at 7pm.**