

From: Dawn Griffiths [REDACTED]
Sent: 19 July 2017 16:57
To: Planning Policy
Subject: Policies, Sites and Places Plan –Main Modifications Consultation (June 2017)
Attachments: PSP_Plan_Main_Modifications__Representations_Form.pdf; July 2017 Mods PSP response.pdf

Dear Sir or Madam,

South Gloucestershire Local Plan: Policies, Sites and Places Plan –Main Modifications Consultation (June 2017)

Thank you for notifying the City Council of the opportunity to comment on the Main Modifications to Policies, Sites and Places Plan.

Please find attached the representation of Bristol City Council which relates to main modifications MM5 and MM30 (Policy PSP4: Designated Local Green Spaces - Charlton Common – Ref LGSD1210) and the representation form.

Please do not hesitate to contact me if you have any queries or require any further information.

Yours faithfully

Dawn Griffiths

Specialist Planning Officer
Strategic City Planning Team
Bristol City Council
PO Box 3176
Bristol
BS3 9FS

Council services online: <http://www.bristol.gov.uk/service>

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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: Griffiths	Surname:
Forename: Dawn	Forename:
Organisation / Company: Bristol City Council	Organisation / Company:
Address: Strategic City Planning Team City Hall PO Box 3176 Bristol	Address: Postcode:
Postcode: BS3 9FS	
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.

Q1. To which main modifications does this representation relate?	
Main Modification Reference:MM5 and MM30 (e.g. MM14)	

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 type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Q2b. Do you consider the Main 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 Main Modification is <u>unsound</u>? Is it because it is <u>not</u>:	
<input type="checkbox"/> Positively Prepared?	
<input checked="" 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.

We object to MM30 on the grounds that Charlton Common (LGSD1210) is no longer proposed for designation as a Local Green Space and as it is shown as being deleted from the Local Green Spaces listed in MM30 (Appendix 2 – Local Green Space Designation).

We also object to MM5 as we consider the process set out paragraph 3.42a of reassessing spaces which are not designated through the PSP Plan (owing to the existence of an outstanding land owner objection) as part of the production of the new Local Plan to be unjustified and unsound.

We consider South Gloucestershire Council conducted a thorough assessment in deciding to designate Charlton Common as Local Green Space in the PSP Plan. The conclusion being that the site met the necessary criteria for designation as a Local Green Space. The City

Council supports this approach and supported and welcomed the inclusion of Charlton Common as a Local Green Space in our representation to the Proposed Submission version of the PSP Plan (June 2016). It appears from examination document E25 (Appendix 1a – Spaces proposed with landowner objection remaining) that South Gloucestershire Council gave consideration to the issues raised in the land owner’s objection in reaching the conclusion to continue with the designation despite the land owner objection.

The site meets the approach for the designation of Local Green Spaces set out in the NPPF and we consider that decisions on the suitability of sites for designation should be made on the basis of public interest.

The reasons for the suitability of the designation of Charlton Common remain and therefore, we consider Charlton Common should be designated as a Local Green Space in the PSP Plan and shown on the policies map and included in the list of Designated Local Green Spaces set out in Appendix 2. It is considered that this approach would be fully justified and an appropriate component of a sound 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:

Dawn Griffiths

Date:

19/07/2017

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 24th July 2017 at 7pm.



Strategic Planning Policy and Specialist Advice Team
South Gloucestershire Council
Environment and Community Services Department
PO Box 1954
Bristol
BS37 0DD

Reply to
Telephone
Minicom
Fax
E-mail
Our ref
Your ref
Date

19th July 2017

Sent by email only

Dear Sir or Madam,

South Gloucestershire Local Plan – Main Modifications (June 2017) to the Proposed Submission: Policies, Sites and Places Plan

Thank you for notifying the City Council of the opportunity to comment on the Main Modifications to the Proposed Submission Policies, Sites and Places (PSP) Plan.

Please find set out below the comments of Bristol City Council which relate to Main Modifications MM5 and MM30 (Policy PSP4 - Designated Local Green Spaces) and the proposed removal of the designation of Charlton Common as a Local Green Space.

MM5 and MM30 – Local Green Space Designation

We object to MM30 on the grounds that Charlton Common (LGSD1210) is no longer proposed for designation as a Local Green Space and as it is shown as being deleted from the Local Green Spaces listed in MM30 (Appendix 2 – Local Green Space Designation).

We also object to MM5 as we consider the process set out paragraph 3.42a of reassessing spaces which are not designated through the PSP Plan (owing to the existence of an outstanding land owner objection) as part of the production of the new Local Plan to be unjustified and unsound.

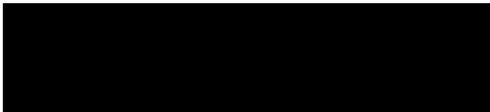
We consider South Gloucestershire Council conducted a thorough assessment in deciding to designate Charlton Common as Local Green Space in the PSP Plan. The conclusion being that the site met the necessary criteria for designation as a Local Green Space. The City Council supports this approach and supported and welcomed the inclusion of Charlton Common as a Local Green Space in our representation to the Proposed Submission version of the PSP Plan (June 2016). It

appears from examination document E25 (Appendix 1a – Spaces proposed with landowner objection remaining) that South Gloucestershire Council gave consideration to the issues raised in the land owner’s objection in reaching the conclusion to continue with the designation despite the land owner objection.

The site meets the approach for the designation of Local Green Spaces set out in the NPPF and we consider that decisions on the suitability of sites for designation should be made on the basis of public interest.

The reasons for the suitability of the designation of Charlton Common remain and therefore, we consider Charlton Common should be designated as a Local Green Space in the PSP Plan and shown on the policies map and included in the list of Designated Local Green Spaces set out in Appendix 2. It is considered that this approach would be fully justified and an appropriate component of a sound plan.

Please do not hesitate to contact me if you have any queries on the content of this letter.



Strategic City Planning Manager
Bristol City Council

