

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: Ross
Forename:	Forename: Andrew
Organisation / Company: Taylor Wimpey UK Ltd	Organisation / Company: Turley
Address:	Address: 40 Queen Square, Bristol
Postcode:	Postcode: BS1 4QP
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 REPRESENTATIONS

Please use a separate form for each representation.

Q1. To which main modifications does this representation relate?	
Main Modification Reference:	MM30

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 checked="" 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>Please see cover letter.</p>
<p><i>Please continue on a separate sheet if necessary</i></p>

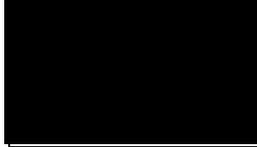
Q5. Please indicate which, if any, of the following you wish to be notified about.

the publication of the recommendations of the independent Inspector

the adoption of the Plan

Please indicate as appropriate

Signature:

A rectangular box containing a solid black redaction covering the signature. To the right of the redaction is an empty rectangular box for the signature.

Date:

18/07/2017

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.

24th July 2017

Delivered by email

Strategic Planning Policy and Specialist Advice Team
South Gloucestershire Council
Environment and Community Services Department
PO Box 299 - Civic Centre
High Street
Kingswood
Bristol
BS15 0DR

Dear Sirs

POLICIES, SITES AND PLACES PLAN: CONSULTATION – JUNE 2017

LGSD1171 – POMPHREY HILL PLAYING FIELDS, SOUTH SIDE ONLY

We write in respect of the above consultation on behalf of **Taylor Wimpey UK Ltd** ["Taylor Wimpey"] who own an extensive area of land at Mangotsfield, as shown on the plan enclosed with this letter.

Part of the land owned by Taylor Wimpey has been added to the list of identified potential Local Green Space Designation within the Emersons Green Parish (**LGSD1171 – Pomphrey Hill playing fields, South Side Only**) as part of the PSP Main Modifications (June 2017). Land hatched blue on **Figure 1** below illustrates the area within LGSD1171 that is owned by our client Taylor Wimpey. This land is currently leased for the provision of playing fields.

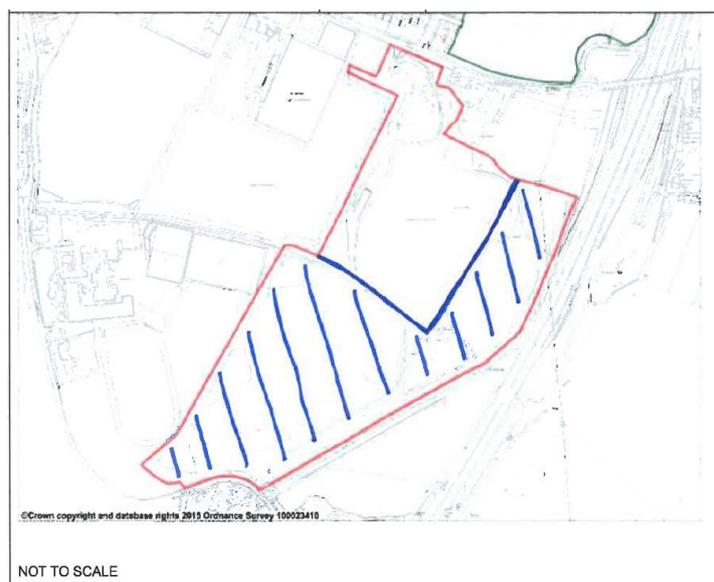


Figure 1 - Location Plan Extract

40 Queen Square
Bristol
BS1 4QP

 turley.co.uk

We write to **strongly oppose** the designation of this site as a Local Green Space on behalf of Taylor Wimpey. There are no reasonable grounds to designate the site as Local Green Space, and there is no specific justification that has been put forward by the Council as to why the designation is required.

Site Context

The area of land in ownership of Taylor Wimpey comprises an undeveloped area of c.8.7ha. The land is bounded by a combination of natural hedgerow and fencing. Immediately north of Taylor Wimpey's land is Pomphrey Hill Pavilion with ancillary activity fields (remaining land within LGSD1171), east is the A4171, to the south is mature vegetation and Rodway Hill lane, and to the west is Mangotsfield High School. The site comprises land sloping west to east, with clusters of vegetation distributed throughout the site.

It should be noted that the existing footpath traversing the land from north-east to the south is not a designated Public Right of Way.

The land is located in the Bath/Bristol Green Belt, a designation that has been maintained by the 2013 South Gloucestershire Core Strategy. The land is allocated for 'formal and informal open space' under Policy LC7 and for 'provision for education facilities' under Policy LC2 of South Gloucestershire Local Plan (2006).

Proposed Local Green Space

No specific justification has been given for the proposed designation of **LGSD117 1** and designation of the nominated land is not in accordance with the National Planning Policy Framework (NPPF), National Planning Practice Guidance (NPPG) or local planning guidance, for the following reasons.

Paragraph 77 of the NPPF states that Local Green Space designation should only be used:

- where the green space is in reasonably close proximity to the community it serves;
- where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- where the green area concerned is local in character and is not an extensive tract of land.

Building on this policy the Council's own guidance confirms that '*blanket designation of all/most green areas or open space within an area is not appropriate*'.

NPPG (Paragraph 007 Reference Id: 37-007-20140306) states that "*Local Green Space designation should not be used in a way that undermines this aim of plan making*". It is interpreted that the land has been nominated for designation to prevent future development on the land. However, the land is already part of the Bristol/Bath Green Belt. Paragraph 88 of the NPPF states that local policy for managing development within a Local Green Space should be consistent with Green Belt policy. Further to this, Paragraph 010 Reference ID: 37-010-20140 of NPPG states that when land is protected by Green Belt policy "*consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space*". The Council is not proposing to alter the Green Belt boundary in this location at this time and the existing Green Belt reinforces the lack of justification to designate the land as Local Green Space.

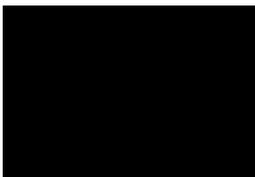
As stated in the second criterion of Paragraph 77, evidence is needed to identify how the land is "*demonstrably special*" to the local community or locally significant. No evidence exists to suggest that the land is of particular wildlife value.

In summary:

- The formal designation of this site as a Local Green Space has not been justified as the evidence that accompanies the PSP DPD;
- Any designation as Local Green Space will duplicate policies and control already in place at the site due to its location within the Bath/Bristol Green Belt, and reinforces the fact that Local Green Space designation is neither appropriate or justified;
- NPPF Paragraph 77 is clear in stating that designation should “*only be used*” when it can meet the three-part test demonstrated in the bullet points. There is no specific evidence with the DPD to show that the land is demonstrably of local significance for any of the reasons which are suggested in the Council’s consultation.

We trust that the above is helpful to the Council and sets out clearly Taylor Wimpey’s **very strong objection** to the potential designation of this land as Local Green Space. This designation is neither necessary nor justified, and therefore any proposed planning policy including it would not be sound.

Yours sincerely



Andrew Ross
Associate Director

