

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: Mrs	Title: Mr / Mrs / Miss / Ms / Dr / Other:
Surname: Reuben	Surname:
Forename: Lesley	Forename:
Organisation / Company: Filton Town Council	Organisation / Company:
Address: Filton Town Council Elm Park Filton South Glos	Address:
Postcode: BS34 7PS	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.

Q1. To which main modifications does this representation relate?	
Main Modification Reference: (e.g. MM14)	MM30 – Appendix 2 Local Green Space Designation (LGSD092)

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 checked="" 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.

- Confusing processes: from the initial email received, whereupon it was difficult to ascertain that the document even referred in any way to Elm Park, navigating our way through the process has been far from clear or transparent. Even once we knew the document did relate to Elm Park, finding the relevant information and map, was difficult to navigate and not in any discernable order.
- Since June 2016, although a grievance was raised then that there had been insufficient consultation, it has remained inadequate with little community involvement: and this is in spite of the National Planning Policy Framework (NPPF) stipulating that "Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential." (Statement of Community Involvement 2015, p. 1)
- There has been a failure in the Duty to Cooperate with and inform the Town Council (the actual land owner) adequately by way of presentations on the detail and providing updates, or even a direct point of contact to deliver information regarding the document to the Town Council and

its community.

- As per point 2.7 (p.4) of the Statement of Community Involvement, Filton Town Council does indeed “represent many thousands of local residents and many varied communities”, and yet all correspondence regarding this Policies, Sites and Places Plan was sent to a generic email account, and not directly to, or specifically for the attention of the Town Clerk, who was then hence unable to act accordingly and appropriately to notify Filton Town Council and the community.
- Along with Station Road Allotment (LGSD098) and the Land behind the Bulldog Pub (LGSD099), Elm Park was included in the Local Green Space Designation. It is concerning that there was no notification that this status was to be altered or amended. There was no awareness raised that there was even a modification to change this piece of land (or even a percentage of this piece of land) from a designated to a non-designated area.
- In your own guidelines, when evidence gathering, you are duty bound to consider the effects on a variety of issues such as the potential impact on social, environmental and economic matters. Reducing the land in Elm Park would clearly breach each of these criteria.
- Reducing the size of Elm Park would contravene the Main Modifications and Additional Modifications (June 2017 document) - particularly PSP2 - Landscape (point 3.20), and PSP44 – Open Space, Sport and Recreation (Point 1 under “protection”).
- It is of the utmost importance to highlight that as well as being legally non-compliant and unsound (as outlined in the points above), reducing the size of Elm Park would impact negatively and detrimentally on the health and wellbeing of the whole community, spanning all sections of society from the users of the skate park and cycle track and outdoor fitness equipment, to the pétanque playing area and numerous users of the community garden, as well as those who contributed to the garden’s creation. The Community Garden itself has been awarded “Outstanding” three years in a row from the Royal Horticultural Society. One of Filton’s important war memorials would also be lost.
- The entire stretch of Elm Park that is being considered is flanked by trees and hedgerow, which accommodate numerous wildlife species: should the stretch of Elm Park have its status changed from designated to non-designated area, and hence lose its protection and be at risk from being reduced in size, the culling of over 200 trees which would then be necessitated seems to totally go against South Glos. environmental and green policies to the point of being unethical.
- Since raising awareness, there has been huge public objection, resulting in an immediate petition and community resistance.
- Elm Park has been registered with Fields in Trust since 2012, an organisation that ensures “to protect vital open spaces all across the UK ... [to] make sure that all kinds of outdoor spaces are safeguarded forever.” A compulsory purchase order would make a mockery of this.

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:

17/07/2017

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.