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Date: 20th Dec 16
Our Ref: PRE16/0890
Enquiries to: Patrick Conroy
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Dear Mr Weaver,

Re: Pre16/0890, Land at Wotton Road, Charfield

I write further to your recent pre-application enquiry. Further to the developer meeting held on the 2nd Dec 16, I thought it worth re-emphasising the Council's position.

As you will be aware South Gloucestershire Council is working alongside the other authorities in the West of England to prepare the Joint Spatial Plan (JSP). This will cover all four UA areas and will provide a new strategic planning context for South Glos to 2036.

The Joint Spatial Plan (JSP) completed its second public consultation (Reg 18) from on December 19th 2016. This follows an earlier Issues & Options consultation (Nov 2105-Jan 2016). Notwithstanding the fact that the Plan is still at a relatively early stage of development and the NPPF would suggest that it is given very limited weight in decision making on planning proposals, it is critical in order to maintain confidence in the primacy of the plan led system that the ability for the JSP to establish the most appropriate spatial strategy, when tested against alternatives, is allowed to proceed unfettered. Significant weight should be afforded to this primary principal and this is a core objective underpinning the NPPF.

We are aware that Barratts intend to submit a speculative outline application for some 120 dwellings and a retail unit. This will be determined on its own merits having regard to the planning policy context and other material considerations and it will be for the decision maker to determine the weight to be attached at the appropriate time. As such, we regard the emerging JSP to be a material consideration.

When assessed against the above principle, it is clear any speculative application for further development in the village at this time, could potentially undermine the future sustainable development of strategic growth at Charfield. Such unplanned growth, could lack coherence and risks embedding harmful piecemeal development, thereby denying the ability of the plan led system to achieve its fundamental objective – which is to plan for the sustainable patterns of development.

Moreover, as you are aware the Charfield community are currently undertaking a neighbourhood plan. While at an early stage, the village neighbourhood plan team have gathered considerable local evidence and canvassed views widely within the village on what

new facilities and services the community would expect to see should additional growth be forthcoming and how the community would like to shape that growth to ensure the character and identity of their village is retained going forward. It is clear that your client's site would be a crucial land asset that the community would expect to have a strong voice through both the Local Plan and Neighbourhood Planning processes for how this is potential brought forward and the type of land uses it could support when considered as part of a comprehensive and coherent approach development of Charfield. To bring development forward in a piecemeal way prior to this work being completed and the local community being afforded a full and fair opportunity to indicate how they would like to see Charfield grow, is in the opinion of South Gloucestershire fundamentally contrary to the objectives of the NPPF and the primacy the government affords the plan led system. The council places great weight on maintaining the ability of our communities to retain confidence and certainty in the role and function of the development plan.

The Government is clear, strategic planning of this nature is the role and function of the development plan. It should not be usurped by a single speculative planning application as the outcome cannot replace the function of the development plan where great weight is placed on testing alternatives and ensuring wide ranging community and stakeholder engagement is carried out. Furthermore neither can a single standalone 'red edged' planning application undertake the more wide ranging and in depth consideration of how places such as Charfield should grow and develop and compare how this performs against alternatives and other potential strategic growth locations being promoted across the whole of the West of England, through the JSP.

Preferred way forward

Given the comments above, officers consider it would not be appropriate to handle this proposal by way of a planning application at this time and request instead this should be dealt with through representations made to the West of England Joint Spatial Plan and South Gloucestershire new Local Plan.

The Council is therefore respectfully request that you reconsider your current course of action.

Regards

Patrick Conroy
Strategic Planning Policy and Specialist Advice Team Manager

Cc Chris Dolling, Barratt Homes Ltd
Clerk to Charfield Parish Council
Cllr John O'Neill