



Representation Ref:
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Respondent Ref:
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Part B

This section will need to be completed for each representation made. Please photocopy or download from the council’s website additional copies of Part B as required.

Organisation or Name Bristol Food Policy Council

1. To which part of the Site Allocations and Development Management Policies (SA&DMP) does this representation relate?

Development Management policy no.	DM1	Site Allocation ref. no.		Designation name	
Paragraph no.	2.1.1 – 2.2.2	Page no.	5		

2. Do you consider the SA&DMP is ‘sound’?*

*The considerations relating to a development plan being sound are explained in the National Planning Policy Framework (paragraph 182) Yes No

If you ticked the ‘No’ box, do you consider the SA&DMP is unsound because it is not:

- (1) Positively prepared Yes
- (2) Justified Yes
- (3) Effective Yes
- (4) Consistent with national policy Yes

3. Do you consider the SA&DMP complies with the legal / procedural requirements for preparing a development plan?

Yes No

4. Please give details why you consider the SA&DMP is unsound or not legally compliant. Please be precise as possible. If you wish to support the soundness or legal compliance of the SA&DMP please also use the space below to set out your comments.

Sustainability is a high priority within Bristol, as demonstrated by Bristol being short-listed for European Green Capital. It is therefore important to get this key policy right.

Policy DM1 has not been subject to previous consultation. The publication version is the first time the policy has been made public. So there has been no previous opportunity to make representations on this. There is a lot of expertise on sustainability within the city that has not had an opportunity to contribute on this key policy before.

This lack of consultation on a key planning policy is contrary to the NPPF, which states:



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“155. Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The current wording of Policy DM1 does not add to what is set out in the National Planning Policy Framework (NPPF) and does not define what sustainable development is. It does not refer to the definition in the box on page 2 of the NPPF or to paragraphs 7 to 9 nor does it address the concept of resilience.

The social role of sustainable development means that local communities should be part of the process of finding solutions and this is omitted from the current wording, which is also contrary to the council’s Statement of Community Involvement (October 2008) and the requirements in clause 122 of the Localism Act 2011 for pre-application engagement and the NPPF (paragraph 189).

The policy wording should make it clear that a presumption in favour of sustainable development also means a presumption against unsustainable development.

The current text does not explain what sustainable development means in a planning context.

(continue on a separate sheet if necessary)

5. Please set out what change(s) you consider necessary to make the SA&DMP sound or legally compliant. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Proposed revised wording with changes in red and ~~strikeout~~.

Policy DM1: Presumption in favour of sustainable development

2.1.1 The Bristol Core Strategy provides a positive and flexible frame work for meeting the development needs of the city. It is supported by a set of Development Management policies which help to ensure new development is compatible with the core planning principles set out in the National Planning Policy Framework.

When considering development proposals a positive approach will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Bristol City Council will always work proactively with applicants and local communities jointly to find solutions that mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental resilience of ~~conditions in the city.~~

Planning applications that accord with the policies in the Bristol Local Plan and, where relevant, with policies in Neighbourhood Development Plans will be approved without delay, unless material considerations indicate otherwise.

When considering whether a development proposal is sustainable or not, account will be taken of its location, layout, design and use against the three pillars of economic development, social development and environmental protection and improvement.



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Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then planning permission will be granted unless material considerations indicate otherwise taking into account whether:

*** Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole;**

or

*** Specific policies in that Framework indicate that development should be restricted.**

Planning applications for unsustainable development, that is development which may undermine the resilience of the sustainable systems Bristol is aiming to establish in its Core Strategy, will be refused.

2.1.2 The National Planning Policy Framework states that Local Plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally. The Planning Inspectorate considers that its suggested model policy wording will, if incorporated into a draft Local Plan submitted for examination, be an appropriate way of meeting this expectation. This policy closely reflects the model wording. It is applicable to all development and should be read in conjunction with paragraph 14 of the National Planning Policy Framework, including the footnotes to that paragraph.

2.1.3 "Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs" (Brundtland Commission 1987). Within a planning context, it means looking at these four aspects of any development:

- The location of a proposed development
- The layout of the development (layout, aspect, orientation, density, public realm)
- The design of the development itself, ie the building or road (design, materials and construction)
- The use of the development (including who will use it and what was the previous use)

Each aspect will be looked at in turn against the three pillars (with each pillar given equal weight) of economic development, social development and environmental protection and improvement and the impact considered. For true sustainable development there should be a positive impact against all three pillars (the win-win-win), so that one is not able to trump the others.

Similarly, for a development to be sustainable it must be sustainable on all four aspects, not just one or two of them. For example, a building may have an excellent BREEAM rating and be zero carbon, but if its layout or location means the only realistic way of getting to it is by car then it is not sustainable.

Resilience is the capacity to cope with and recover from adversity. It is about reducing the vulnerability of a development, a community or the city as a whole to future external economic, social and environmental shocks, such as climate change, peak oil or



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austerity policies. Precariousness is one aspect of resilience. When the current state is close to a limit or threshold then one more development could be the tipping point that leads to permanent change from which recovery is difficult, if not impossible.

Increasing specialisation and dependency, e.g on a small number of industries or land uses, tends to reduce resilience, while increasing diversity improves resilience.

(continue on a separate sheet if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support the representation and suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. After this stage, further submissions will be only at the request of the Inspector, based on matters and issues they identify for examination.

6. If your representation is seeking a change do you consider it necessary to participate at the examination hearings?

No, I do not wish to participate in the examination hearings

Yes, I wish to participate in the examination hearings

7. If you wish to participate at the examination hearings please outline why you consider this to be necessary:

We would be happy to attend the examination hearings to elaborate on our representation and to hear the views of other participants on this issue if called by the Inspector.

(continue on a separate sheet if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearings.

8. Do you wish to be notified at the address/email stated in Part A of any of the following:

(1) that the Site Allocations and Development Management Policies have been submitted for independent examination

(2) the publication of the recommendation of any person appointed to carry out an independent examination of the Site Allocations and Development Management Policies

(3) the adoption of the Site Allocations and Development Management Policies

Signature: KEVIN MORGAN *[Handwritten Signature]* Date: 09/05/13