

Draft Local Plan Policy En12 Inset 14 Blockley

LGS 1 Blockley Allotments

Matter 14

Inspector's Supplementary Questions for Matters 14 & 15

I write as a plot holder and member of the allotments association and not from the official position of Secretary, which I have held since 2014.

1. A revision to DS2/DS3 is proposed to permit development on land adjacent to settlement boundaries only if housing land supply falls below a stated requirement level. I suggest it be further modified in order to reduce potential strategy conflicts ie this policy applies only to adjacent land not affected by other local plan enhanced protection policies such as Local Green Spaces. Otherwise the amendment may defeat the purpose of the other enhanced policies.
2. Question 192A asks whether the plan is consistent with NPPF73 and 74 in respect of building on existing open spaces. As currently proposed and without amendment I believe it is. Question 192B asks if a site is protected by other designations/policies, what additional local benefit is provided by identifying it as LGS? The NPPF necessarily deals with national strategic policies and it is the role of the Local Plan to amplify and clarify within the local context. Without such measures, ambiguities would occur and lead to an unwelcome and unintended planning application adversely impacting limited LPA resources. Further, separate designations afford varying protections and so LGS provides the opportunity to identify community valued sites and to clarify the appropriate level of protection where applicable to a specified location.
3. Both strategic points are shown in the Strutt & Parker submission on Blockley Allotments and later emails which together more closely resemble a planning application than a consideration of policy soundness. The relevant development strategy policy issues are whether:
 - a) criteria for designation are sufficient and whether the site meets them? CDC's evidence demonstrating soundness is fully set out in the LGS Evidence Update.Feb 17 as regards LGS1 Blockley.
 - b) landowner objections are ignored? S&P cite evidence of South Gloucestershire,s inadequate consideration of landowner objections. However, their own objections are referenced and the decision rationalised in the LGS Evidence Update. Feb 17 core document.
 - c) the site is incapable of enduring beyond the plan period because notice to quit may be served. Were the threat of eviction sufficient in the case of Blockley allotments, so would it be elsewhere. Our community was invited to apply and to demonstrate suitability for LGS designation explicitly to establish community preference and it was noted that local authority allotments – as reasonably protected – were unlikely to gain approval. All the support noted in the Evidence Papers makes plain that Blockley

Parish's only remaining allotment site is perfectly and enthusiastically sustainable providing community benefit. Without consent to a change from horticultural use, the land has limited commercial value. This land could well remain as designated for decades to come; to accept S&Ps argument could have the effect of making land use planning unfeasible.

d) the site should be excluded as effectively the landowner is concluding a negotiation? It would be unreasonable if the Blockley Allotments Association were not to engage with the landowner to consider any proposal, especially under the threat of eviction. No detailed proposal has yet been brought forward for possible recommendation to the membership and the notional land proposed is 20% smaller than the designated LGS. At present discussions continue to be speculative and should be informed from the outcome of the LP inspection, rather than serve as input.

e). There is a need to build here? Parish housing surveys which carry weight to the emerging plan indicate a low level of need in Blockley. Blockley has been allocated a requirement within the district OAN and recent revisions indicate a district provision of 10,504 dwellings against a requirement of 8,400 dwellings, a 25% surplus. There does not appear to be any local or district need to overturn Policy DS2 and build at this location.