

**SOUTH GLOUCESTERSHIRE CORE STRATEGY  
– EXAMINATION HEARING**

**STATEMENTS ON BEHALF OF PERSIMMON  
HOMES, ASHFIELD LAND AND CHARLTON  
ESTATES**

**MAY 2012**

## CONTENTS

Introduction	1
Matter 1: Legal Compliance/Procedural Matters	4
Matter 2: Justification – The Evidence Base	6
Matter 3: Spatial Portrait, Issues, Visions and Objectives	8
Matter 4: Sustainability Appraisal	10
Matter 5: Regional Strategy	12
Matter 6: Green Belt	14
Matter 7: Spatial Strategy, Location of Development	18
Matter 8: Provision and Distribution of Housing	22
Matter 9: Filton Airfield	24
Matter 11: Affordable Housing/Rural Exception Sites/Extra Care Housing	27
Matter 12: Gypsy and Traveller Provision – Policies CS21 & CS22	29
Matter 14: Strategic Transport and Accessibility	30
Matter 16: Infrastructure and Developer Contributions	34
Matter 17: Green and Community Infrastructure & Cultural Activities, Sport & Recreation	35
Matter 18: Renewables	36
Matter 19: Design	37
Matter 20: Density/Diversity	38

ID No. 4032065

24 May 2012

TA Ref: PERA2009  
LPA Ref:  
Office Address: 10 Queen Square  
Bristol  
BS1 4NT  
Telephone 0117 989 7000  
Date of Issue: May 2012

## Introduction

- 1.1 The following Statements have been prepared by Turley Associates on behalf of Persimmon Homes, Ashfield Land and Charlton Estates, who control land at Wyck Beck Road/Fishpool Hill which is part of the proposed Cribbs/Patchway New Neighbourhood.
- 1.2 Representations to the Draft Core Strategy (and subsequent proposed changes) were previously submitted by Turley Associates on behalf of Persimmon Homes and Ashfield Land. Turley Associates are instructed to progress these representations at this Examination.
- 1.3 Persimmon Homes, Ashfield Land and Charlton Estates will shortly (prior to the Examination hearings) be submitting a planning application for up to 1,100 dwellings, on land at Wyck Beck Road/Fishpool Hill. This development is an important early phase of the New Neighbourhood proposals, provides a primary means of access into the wider development site and it is important to make progress now to ensure the timely delivery of housing required in the local area to meet sustainable development objectives.
- 1.4 The following Statements provide our initial comments based on the matters identified by the Inspector for examination at the respective sessions.
  - Matter 1: Legal Compliance/Procedural Matters
  - Matter 2: Justification – the Evidence Base
  - Matter 3: Spatial Portrait, Issues, Vision & Objectives
  - Matter 4: Sustainability Appraisal
  - Matter 5: Regional Strategy
  - Matter 6: Green Belt
  - Matter 7: Spatial Strategy, Location of Development
  - Matter 8: Provision and Distribution of Housing (see separate joint response submitted by Barton Willmore)
  - Matter 9 – Filton Airfield
  - Matter 11 – Affordable/Rural Exception Sites/Extra Care Housing
  - Matter 12: Gypsy and Traveller Provision (see separate response submitted by Turley Associates)
  - Matter 14: Strategic Transport and Accessibility

24 May 2012

- Matter 16: Infrastructure and Developer Contributions
- Matter 17: Green and community Infrastructure and Cultural Activities, Sport and Recreation
- Matter 18: Renewables
- Matter 19: Design
- Matter 20: Density/Diversity

1.5 These representations will be elaborated further at the relevant Examination hearings.



## Matter 1: Legal Compliance/Procedural Matters

### Question 2: Is the Core Strategy (CS) in general conformity with the National Planning Policy Framework (the Planning Framework) or, if not, is it possible to introduce modifications without detracting from the Council's overall strategy for South Gloucestershire?

- 1.6 The Core Strategy is not in general conformity with the NPPF as currently drafted. Our concerns relate specifically to the Council's failure to plan positively for sufficient levels of growth, and the approach taken to the Green Belt.
- 1.7 The Council is continuing to fail to plan for suitably ambitious levels of growth over the plan period. The available evidence sources demonstrate a need for housing delivery in excess of the 26,435 dwellings proposed by the Council. This situation is exacerbated further by the Council's proposed move towards housing provision being expressed as a maximum target, rather than a minimum requirement. Again this fails to plan positively for future growth, or to provide sufficient flexibility to changing circumstances throughout the plan period.
- 1.8 The Core Strategy fails to reflect the requirement for a 'step change' to boost significantly the supply of housing (as per the requirements of Paragraph 47 of the NPPF) and also to ensure genuine choice and competition in the availability of land. The Council's approach to the extent and strategic purposes of the Green Belt continues to prevent the Core Strategy from planning for, and making land available to, meet the overall needs and demand for housing that arise in South Gloucestershire in an ambitious way.
- 1.9 We are also concerned with the Council's approach to the Green Belt, and in particular its evidence base (Strategic Green Belt Assessment, December 2011) that has informed the Council's position. The Council has failed to prepare a comprehensive review of the Green Belt, instead providing a document that provides no justification for the additional locations that have been identified for release.
- 1.10 As per our other representations, this position should be resolved through modifications to the housing provision set out in **Policy CS15**, specifically basing its requirement on the 2008 household projections (e.g. 33,000 over the plan period). This increase in provision can be met without compromising the Council's Green Belt strategy, given the availability of suitable, and sustainable, strategic non-Green Belt sites (e.g. land to the east of Chipping Sodbury) and more

localised non-strategic releases from the Green Belt through the Policies, Sites and Places DPD process.