

**SOUTH GLOUCESTERSHIRE CORE STRATEGY
– EXAMINATION HEARINGS**

**STATEMENTS ON BEHALF OF TAYLOR
WIMPEY**

MAY 2012

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Introduction

- 1.1 The following Statements have been prepared by Turley Associates on behalf of Taylor Wimpey. Representations to the Draft Core Strategy (and subsequent proposed changes) were previously submitted by Turley Associates on behalf of Taylor Wimpey. Turley Associates are instructed to progress these representations at this Examination.
- 1.2 The following Statements provide our initial comments based on each of the relevant 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 5: Regional Strategy
 - Matter 6: Green Belt
 - Matter 7: Spatial Strategy, Location of Development
 - Matter 8: Provision and Distribution of Housing (see separate joint statement submitted by Barton Willmore)
- 1.3 Our representations will be elaborated further at the relevant Examination sessions.

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?

- 1.4 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.
- 1.5 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.
- 1.6 The Core Strategy fails to reflect the requirement for a 'step change' in housing provision 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.
- 1.7 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.
- 1.8 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 and more localised non-strategic releases from the Green Belt through the Site Allocations DPD process.