

**SOUTH GLOUCESTERSHIRE CORE STRATEGY
– EXAMINATION HEARING**

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

MAY 2012

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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

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- 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 2: Justification – The Evidence Base

Question 1: Is the evidence base sufficiently comprehensive to support the strategy which the Council has put forward and, if not, what critical information is missing?

- 1.11 The Council's evidence base remains insufficient to support the strategy put forward in the Core Strategy. In particular, the evidence base prepared to support the proposed housing provision and the Green Belt strategy is not sufficiently comprehensive or justified. This situation has not been rectified by the additional evidence prepared by the Council in December 2011, namely the Supplementary Housing Paper (December, 2011) and Strategic Green Belt Assessment (December, 2011). Both documents have been prepared to effectively 'retrofit' the Council's proposed strategy, rather than provide a comprehensive and balanced evidence base. As such, the Council's approach to housing provision and additional Green Belt releases is unjustified and not supported by a robust and up-to-date evidence base.
- 1.12 As set out in our response to Matter 12, the Council's evidence base relating to gypsy and traveller provision is also insufficient to support the proposed strategy. This issue is addressed in more detail in our further response to Matter 12, and will be discussed in more detail at the relevant Examination session.

Question 2: The Council continues to refer to policies in the South Gloucestershire Local Plan. In view of changes to the development plan system is it satisfactory to rely on older policies and how can any potential deficiency be addressed.

- 1.13 As a matter of principle, the Council should review all policies and test them against more up to date national policy and evidence. It is not satisfactory to refer to those policies that formed part of the Local Plan, without such a thorough review.