

**SOUTH GLOUCESTERSHIRE CORE STRATEGY
– EXAMINATION HEARING**

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

MAY 2012

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TA Ref: PERA2009
LPA Ref:
Office Address: 10 Queen Square
Bristol
BS1 4NT
Telephone 0117 989 7000
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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 3: Spatial Portrait, Issues, Visions and Objectives

Question 1: Does the Spatial Portrait provide a reasonable snapshot of the area and the issues which face it?

- 1.14 We have some specific comments regarding the Spatial Portrait and the 'Key Issues' identified.
- 1.15 To provide a clear understanding of the issues facing the area, direct reference should be made within the 'Key Issues' to the role of the Green Belt in determining how the overall Core Strategy is formed. Historically, the Green Belt has been identified by the Council as a limit/constraint to further growth in the district. This continues to be the case through the current Core Strategy. Paragraph 1.39 states that the Council *"has sought to limit the impact of new housing development on the Green Belt"* and *"remains in principle opposed to significantly reducing Green Belt to accommodate land for housing growth per se"*. How the Green Belt is addressed through the Core Strategy, whilst managing the need for future growth, is therefore a clearly a key issue. Given the Council's position it is fundamental that strategic non-Green Belt development is maximised in appropriate and sustainable locations. A further key issue is ensuring that provision is made for non-strategic development sites on the edge of the urban area, which could be valuable in meeting the sustainable needs of the area.
- 1.16 We strongly agree with the identification of managing future development, and specifically accommodating new housing and jobs as a key issue. It is, however, fundamental that the Council account for an appropriate level of future development over the plan period. Paragraph 3.8 recognises that despite the recent economic downturn, *"it is anticipated the rate of growth will return to normal levels in the future"*. This is a key issue and is not currently reflected in the Council's wider strategy set out elsewhere in the Core Strategy. This issue is picked up in more detail through our response to other matters being considered as part of this Examination.

Question 2: Are the Strategic Objectives broadly consistent with the aspirations of organisations and the population and do they provide appropriate goals for the Council to pursue?

- 1.17 The strategic objectives are broadly consistent with national planning policy and provide appropriate goals for the Council to work towards. We do, however, have

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concerns with the manner in which the Council propose to deliver the strategic objectives through the wider Core Strategy.

- 1.18 We are particularly concerned by the Council's failure to plan positively for growth as per the requirements of the NPPF. By failing to do so, the Core Strategy does not set sufficiently ambitious targets for housing development across the district. The Council's approach to the Green Belt also threatens to undermine the delivery of the wider strategic objectives set out in Section 4. These issues will be addressed in more detail through our further representations submitted in response to the Inspector's questions, and at the Examination itself.