

**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 4: Sustainability Appraisal

Question 2: Is the latest version of the Sustainability Appraisal sufficiently comprehensive in setting out alternative options through all preparatory stages of plan preparation?

- 1.19 Paragraph 1.29 of the Sustainability Appraisal Report (December, 2011) (PS3) states that its principal aim *“is to appraise the appropriateness of the decisions to allocate land for certain purposes and to establish the principle of development”*. We are, however, concerned about the basis on which this appraisal has been made. Paragraph 2.6 of the Sustainability Appraisal Report states that appraisals of policies in the Core Strategy have been informed by the various technical studies prepared as part of the Council's evidence base. As set out elsewhere in our representations, we have significant concerns regarding the appropriateness of a number of the technical documents forming part of the Council's evidence base (in particular those relating to housing provision and assessment of the Green Belt). As such, key elements of the Sustainability Appraisal Report itself are also flawed.
- 1.20 These concerns are particularly pertinent when considering the appropriateness of how the Council has set out and appraised alternative options. The starting point for this appraisal was flawed given the reliance on technical work that promotes much lower housing provision than is actually required (see Matter 8) and provides an insufficient review of the Green Belt (see Matter 6). Our clients are concerned that ultimately the Sustainability Appraisal, as with other elements of the Council's evidence base, has been 'retro-fitted' to justify the spatial approach set out in the Core Strategy. As a result inadequate consideration has been given to other alternative strategic non-Green Belt options during the preparation of the plan, resulting in the release of two strategic Green Belt sites ahead of other more suitable strategic non-Green Belt sites.