

**SOUTH GLOUCESTERSHIRE CORE STRATEGY
– EXAMINATION HEARING**

**STATEMENTS ON BEHALF OF PERSIMMON
HOMES AND MAXIMUS DEVELOPMENTS**

MAY 2012

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TA Ref: PERA2019
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 and Maximus Developments, who control land to the east of Chipping Sodbury.
- 1.2 Representations to the Draft Core Strategy (and subsequent proposed changes) were previously submitted on behalf of Persimmon Homes and Maximus Developments. Turley Associates are now instructed to progress these representations at the forthcoming Examination.
- 1.3 The following Statements provide our initial comments based on each of 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 12: Gypsy and Traveller Provision (see separate response submitted by Turley Associates)
 - 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
 - Matter 21: Yate and Chipping Sodbury
- 1.4 These representations will be elaborated further at the relevant Examination sessions.

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?

- 1.5 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 then also flawed.
- 1.6 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 relies 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 (Incorporating Post-Submission Changes). 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 strategic Green Belt sites ahead of other more suitable strategic non-Green Belt sites.
- 1.7 Our clients also strongly disagree with the specific *“sustainability reasons”* given on Page 30 of the Report for dismissing development to the east of Chipping Sodbury. These include concluding that development in this location
- cannot be visually contained without significantly changing the nature and character of the landscape of the area and of the tranquillity and setting of the AONB.*
- 1.8 A suite of technical work has been undertaken on behalf of our clients, including a Landscape Assessment, which concludes that the proposed urban extension can

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be developed without any significant adverse impact on the Cotswold AONB, having regard to topography, physical features and the proposed structural landscaping at the site. It was also concluded that development to the east of Chipping Sodbury would help to provide a strategic landscape edge, without prejudice to the ancient commons and AONB. Development would be visually contained by the strategic landscape area. The technical work is summarised in the promotional document (dated August 2010) submitted as part of our clients representations to the Pre-Submission Draft Core Strategy.