

**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 6: Green Belt

Question 1: In preparing the CS has the Council adequately explored the potential of land within the Green Belt to meet identified and future development needs?

- 1.23 We believe that it would be more appropriate to first consider whether the Council has adequately explored the potential of **non-Green Belt** sites to meet identified and future development needs. This approach would be consistent with the Council's overall strategy given that they remain "*in principle opposed to significantly reducing the Green Belt to accommodate land for housing growth per se*". Given that the Council has sought to limit the impact of new housing development on the Green Belt, it would be entirely logical to firstly undertake a comprehensive review of strategic sites, which are located outside of the Green Belt. This process has not been undertaken.
- 1.24 Instead, the Council has identified two strategic sites for release from the Green Belt ahead of other more appropriate non-Green Belt strategic sites (for example land to the east of Chipping Sodbury). This process is flawed, particularly in the context of the proposed level of growth planned for in the Core Strategy. It would be more appropriate to first allocate sustainable and deliverable non-Green Belt strategic sites. If the number of dwellings required through the Core Strategy were to be increased (as per the prevailing evidence base), it could then be argued that there was a need to consider strategic releases from the Green Belt towards the end of the plan period. Any such releases should be based on a comprehensive and thorough review of the Green Belt.
- 1.25 For example, the site identified for release at Haw Wood, it is not considered to be an essential component of the Cribbs/Patchway New Neighbourhood. The development would effectively be a separate neighbourhood, with the Sustainability Appraisal Report (December, 2011) itself recognising that the "*A4108 is significant barrier to integration of a new development with wider area*". The site also currently fulfils an important function for sports provision. This role will be particularly important to support the early years of the Cribbs/Patchway New Neighbourhood. Should development be needed in this location it should therefore be considered as a later phase.

Question 2: Is the Council's approach to its Green Belt consistent with the requirements of the national planning policy framework?

- 1.26 Paragraph 85 of the NPPF states that when defining (Green Belt) boundaries, LPA's should, ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development and satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period, amongst other things. The December 2011 South Gloucestershire Strategic Green Belt Assessment (Paragraph 1.8) specifically identifies that:

Should there be a need for future detailed amendments to Green Belt boundaries, arising from non strategic sites, for example on smaller sites on the edge of existing urban areas and defined settlement boundaries, these will be addressed through other DPDs and/or through Neighbourhood Planning.

- 1.27 The Council's evidence recognises that non-strategic development sites on the edge of the urban area could be valuable in meeting the sustainable development needs of the area. This approach, however, is not reflected within **Policy CS5**, as set out within our representations. As currently drafted **Policy CS5** only anticipates land being released from the Green Belt in association with the two strategic developments at Cribbs/Patchway and Harry Stoke. This is not consistent with the evidence base or the NPPF. Specific changes should also be made to **Policy CS5** to identify that smaller non-strategic sites on the edge of the existing urban area may be released from the Green Belt, either through other (Site Allocations) DPD's or through Neighbourhood Planning.
- 1.28 To potentially allow other smaller scale sites that are currently within the Green Belt to be released during the plan period, ensuring compliance with the NPPF and a sound overall approach, **Policy CS5** should be amended. Without this change it would not be possible for any subsequent DPDs or Neighbourhood Plans that sought to make additional smaller scale releases from the Green Belt to conform with the Core Strategy.
- 1.29 This amendment would ensure that land which does not meet the 'tests' set out in Paragraph 82 of the NPPF could be removed from the Green Belt. It would also comply with Paragraph 85 of the NPPF, which makes it clear that when defining Green Belt boundaries, LPA's should not include land that it is unnecessary to keep permanently open.
- 1.30 **Policy CS5** indicates that following the development of the new neighbourhoods, the Council will examine the scope to extend Green Belt designation to

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compensate for losses elsewhere. This is entirely inappropriate and is not supported by relevant evidence or planning policy. This approach was specifically rejected by the RSS Panel (Paragraph 4.0.37 of the Panel Report), which concluded that there was no evidence to justify such extensions. This continues to be the case, and it is inappropriate to designate new Green Belt solely to compensate for the loss of Green Belt land elsewhere in the district. Any assessment of the Green Belt must be carried out in the context of a wider review, which looks at how the housing needs of Bristol can be met in a sustainable way.

Question 3: How likely is it that existing Green Belt boundaries would need to be changed at the end of the plan period?

- 1.31 Given the Council's continued under provision for housing growth over the plan period, and failure to undertake a comprehensive review of the Green Belt, it is considered likely that existing Green Belt boundaries will need to be reviewed at the end of the plan period.