

**SOUTH GLOUCESTERSHIRE CORE STRATEGY
– EXAMINATION HEARINGS**

**STATEMENTS ON BEHALF OF TAYLOR
WIMPEY**

MAY 2012

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Introduction

- 1.1 The following Statements have been prepared by Turley Associates on behalf of Taylor Wimpey. Representations to the Draft Core Strategy (and subsequent proposed changes) were previously submitted by Turley Associates on behalf of Taylor Wimpey. Turley Associates are instructed to progress these representations at this Examination.
- 1.2 The following Statements provide our initial comments based on each of the relevant 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 5: Regional Strategy
 - Matter 6: Green Belt
 - Matter 7: Spatial Strategy, Location of Development
 - Matter 8: Provision and Distribution of Housing (see separate joint statement submitted by Barton Willmore)
- 1.3 Our representations will be elaborated further at the relevant Examination sessions.

Matter 6: Green Belt

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

- 1.18 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.

- 1.19 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 previous 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 be made to **Policy CS5** to identify that smaller 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. Our understanding is that the Council has sympathy with this argument and we will seek to mutually agree revised wording for this policy prior to the Examination.
- 1.20 An example of a such a site, which is available and suitable for development, is land controlled by Taylor Wimpey at Mangotsfield, part of the East Fringe. Because of the nature of the Council's assessment work to date (and it's evidence base) this site, and possibly others like it in other locations, have not been specifically assessed by the Council as part of a Green Belt review, or as part of its Strategic Housing Land Availability Assessment.
- 1.21 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

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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.

- 1.22 **Policy CS5** indicates that following the development of the new neighbourhoods, the Council will examine the scope to extend Green Belt designation to 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.

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

- 1.23 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.