

- Matter 7 / Spatial Strategy & Location of Development 20 June 2012
 - Personal ID No: 3354113
 - Ian Jewson Planning Ltd
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7 - Spatial Strategy and Location of Development

The following written statement has been prepared by Ian Jewson Planning Ltd (IJP) on behalf of ATA Estates (Longwell Green) LLP. This seeks to summarise the significant concerns expressed to the Council regarding both the content and the process of preparation of the Core Strategy. This written submission is intended to be supplemented by oral evidence at the forthcoming Examination. It is not the intention of this statement to repeat matters raised in earlier representations.

Fundamentally it is considered that the plan is at odds with national guidance as it has not been '**positively prepared**' based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, nor is it:

- **Justified** – the plan is not the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan is not deliverable over its period; and
- **Consistent with national policy** – the plan is at odds with National Policy including the NPPF

Justified

The Evidence Base

In earlier submissions we have highlighted our significant concerns regarding the robustness of the Council's evidence base which underpins the Core Strategy and in particular the approach taken in relation the strategy and location of development. We consider that these concerns have not been addressed.

The strategy of relying on existing commitments up to 2016 is unlikely to address the significant undersupply of houses which has already occurred in South Gloucestershire since 2000/01. This approach should be complemented by a detailed review of green belt boundaries and an urgent review of the potential for small and medium sized sites to meet the shortfall at the earliest opportunity. The Strategic Green Belt Assessment published in September 2006 was prepared to consider how the green belt fulfils its

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statutory functions against the objectives and purposes contained within PPG2. It did not however undertake a detailed review of green belt boundaries. The latest review published by the Council in December 2011 is inadequate and simply reviews those areas which have already been identified for development.

There are many smaller sites which could make a significant contribution to housing supply in the short term. In particular land at Williams Close, Longwell Green (as edged red on the plan attached at **Appendix 1**) has the potential to accommodate a medium scale housing development including much needed affordable housing. The site is also adjacent to other land which could be brought forward comprehensively and overall could make a significant contribution to South Gloucestershire's housing supply. The proposals could be developed in a manner which avoided any detrimental impact on the surrounding area. Whilst currently designated as green belt parts of the site are different in character to the open countryside beyond. The Council's strategic green belt assessment was undertaken at a high level and therefore does not differentiate between land which should be retained as green belt and those areas which could be developed without causing harm.

Based on the Council's record of delivering large strategic sites, it is unrealistic to expect developments at Cribbs/Patchway and land to the east of Harry Stoke to meet anticipated supply targets beyond 2015/16 on their own.

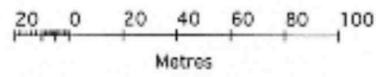
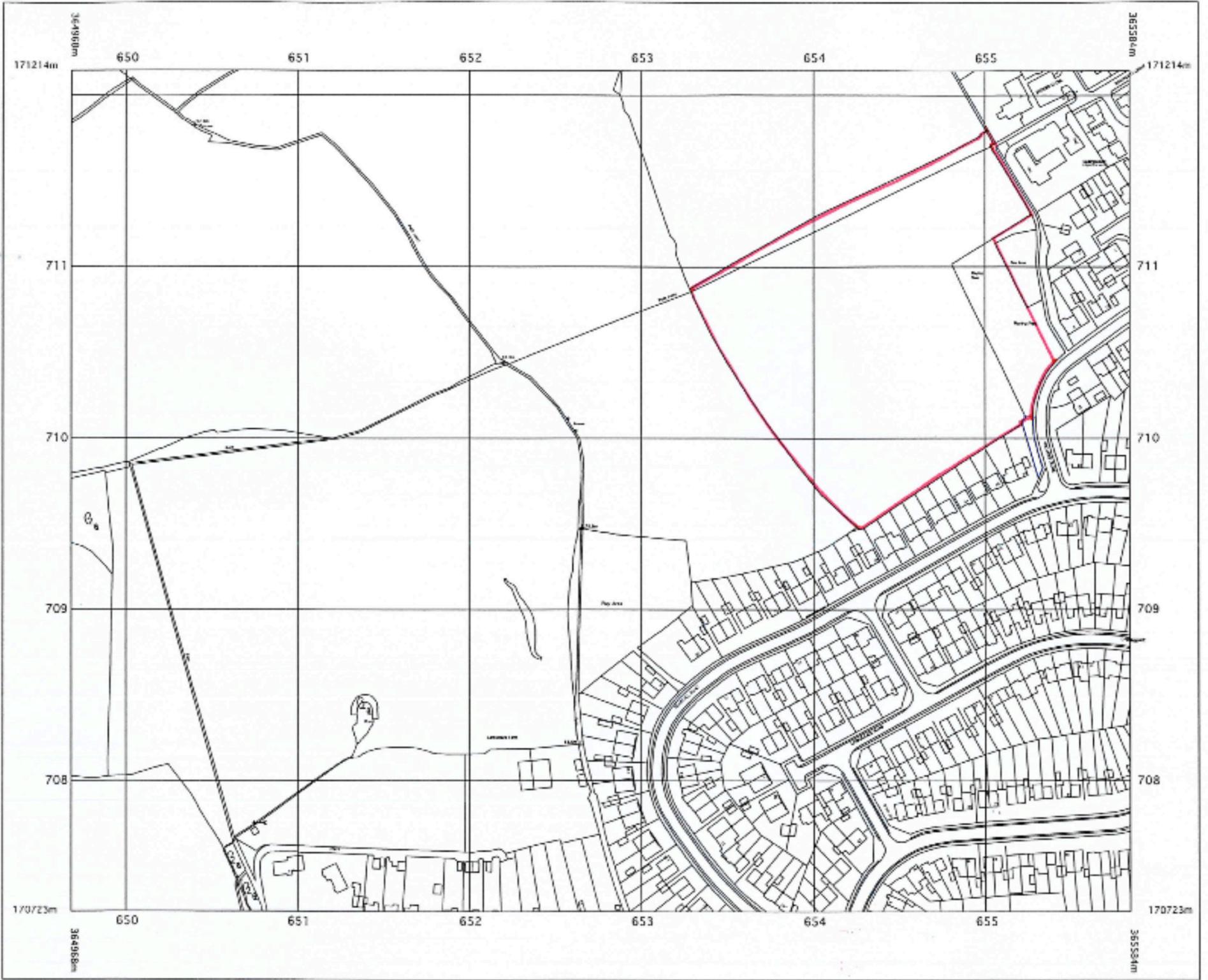
The Council's limited changes to the Green Belt are not based on a robust evidence base. It is clear that the Council have hurriedly prepared a more substantial green belt review following the Inspector's comments at the pre-examination hearing. However, the Council's strategic green belt assessment prepared in 2006 and the updated green belt review are still far too narrow to provide a full appreciation of the characteristics of the Green Belt in South Gloucestershire.

It is unclear why the Council has resisted the need for a full review throughout the Core Strategy process. The absence of this fundamental piece of evidence undermines the

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Council's entire strategy for plan making. Should the Core Strategy proceed to examination before this evidence has informed the Council's decision making, it is considered that the plan will be unsound.

The Council suggests (at paragraph 6.5) that development will take place where essential infrastructure is in place or planned. However, the Council's limited assessment of areas which do not meet the objectives of green belt land has resulted in suitable development sites being overlooked and unnecessarily constrained. Had the Council undertaken a detailed assessment of the green belt boundary it would be in a position to plan more positively and accommodate further housing growth.



SITE LOCATION
LONGWELL GREEN OFF WILLIAMS CLOSE

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