

**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 7: Spatial Strategy, Location of Development

### Question 1: Is the overall strategy consistent with sustainable development principles as contained in the Planning Framework?

- 1.32 The overall strategy is not consistent with the sustainable development principles contained in the Planning Framework. Paragraph 14 of the NPPF states that at the heart of the document is a presumption in favour of sustainable development. For plan-making this means that LPA's should "*positively seek opportunities to meet the development needs of their area*". The Core Strategy as currently drafted fails to plan positively for the full development needs of the area. This is particularly clear in the continued failure of the Council to provide for sufficient levels of housing provision over the plan period. As it stands the Core Strategy does not provide for the supply of housing required to meet the needs of present and future generations. This issue is addressed in more detail in our response to Matter 8, and will be dealt with at the respective Examination session.
- 1.33 Our clients also disagree with the Council's strategy to focus development up to 2016 on existing commitments and the remaining South Gloucestershire Local Plan allocations. This should not rule out commencement on appropriate early phases of the new neighbourhoods. **Policy CS5** is currently not consistent with the sustainable development principles contained in national planning policy. **Policy CS5** states that the Cribbs/Patchway new neighbourhood will be brought forward post 2016 in the Pre-Submission Publication Draft Core Strategy, and post 2015/2016 in the Core Strategy (Incorporating Post-Submission Changes).
- 1.34 Our clients will be submitting a planning application shortly for development of land which is a key part of the new neighbourhood, potentially allowing development to be commenced during 2013. This approach has been discussed with Council Officers and is reflected in a Planning Performance Agreement (PPA). Land at Wyck Beck Road/Fishpool Hill is a logical early phase and should be progressed prior to 2016. **Policy CS5** should therefore be reworded to avoid unnecessarily delaying development. The wording is also inconsistent with that contained elsewhere in the Core Strategy. Paragraph 12.7 states that the planning and commencement of the new neighbourhood at Cribbs/Patchway is part of the focus for development up to 2016.

**Question 2: Are there other spatial options which would be more likely to deliver better outcomes for South Gloucestershire during the plan period?**

- 1.35 We agree with the overall approach of delivering new development within the north and east fringes of the Bristol urban area. We do, however, have concerns about the release of Green Belt land ahead of other strategic non-Green Belt sites. Instead, the Council should first allocate suitable and sustainable strategic non-Green Belt sites in other key settlements. Should the overall housing provision be increased, a comprehensive strategic review of the Green Belt should be undertaken to determine which strategic sites should then be released towards the end of the plan period.
- 1.36 By providing for small and medium sized strategic sites, alongside strategic new neighbourhoods, the Core Strategy would deliver better outcomes for the district as a whole. This approach would deliver greater flexibility and choice across the plan period. This approach is also more likely to result in benefits outside of just the north and east fringes.

**Question 3: Is the overall balance of growth between identified settlements clearly founded on the evidence base and is it likely to be effective in promoting sustainable development across the Borough?**

- 1.37 The overall balance of growth between the identified settlements is not clearly founded on robust evidence. We also question whether the overall balance will deliver sustainable development across the district. This is in part the result of the Council's continued failure to provide for sufficient levels of growth through the Core Strategy.
- 1.38 The Council's evidence base continues to underestimate the level of housing growth required across the district. This has a direct impact on the distribution of growth between the identified settlements. Whilst we support the principles of the strategic new neighbourhoods, the current strategy fails to direct sufficient growth to other key settlements, in particular Chipping Sodbury. To promote sustainable development it is necessary to provide for a range of development, of varying scales, across appropriate settlements.
- 1.39 We also question the Council's decision to release Green Belt land ahead of other sustainable strategic locations that are not within the Green Belt. This approach is based on the Council's flawed evidence base (Strategic Green Belt Assessment, December 2011). The Council has therefore failed to identify sufficient locations in other settlements that are not within the Green Belt.

**Question 4: Is the spatial strategy deliverable in the plan period and have the risks to delivery been properly assessed.**

- 1.40 The deliverability of the spatial strategy is undermined by the failure to identify sufficient small to medium scale strategic allocations. Whilst we support the overall principle of identifying strategic new neighbourhoods, it is important that the Core Strategy supports this provision with additional smaller strategic sites. Such sites can be brought forward earlier in the plan period given that they are subject to less onerous infrastructure requirements and lead in times.
- 1.41 Deliverability is also questioned given that the spatial strategy currently places an over emphasis on housing delivery in the latter half of the plan period. This is evident with the proposed phasing for development at the Yate and Cribbs/Patchway new neighbourhoods, which have a majority of development scheduled for 2021/22 to 2026/27. There is a concern that delivering 4,570 dwellings at the Cribbs/Patchway new neighbourhood between 2021/22 to 2026/27 is not deliverable.

**Question 5: Is there sufficient flexibility in the CS to allow for change or unforeseen events?**

- 1.42 The Core Strategy currently fails to provide sufficient flexibility to adapt to rapid change, as required by Paragraph 14 of the NPPF. This is particularly evident in the housing provision and distribution proposed through **Policy CS15**. The proposed level of housing provision does not reflect a suitably ambitious level of growth within the area. This position is exacerbated by the Council's intention to adopt maximum housing targets, rather than setting out minimum requirements.
- 1.43 As such, the Core Strategy fails to deliver the step change to boost significantly the supply of housing required by Paragraph 47 of the NPPF, or to ensure genuine choice and completion in the availability of land. In doing so, the Core Strategy does not provide sufficient flexibility and responsiveness in the provision of development to meet economic development and community objectives. The Council's view that there is a perceived lack of industry capacity to deliver has also prevented the Core Strategy planning for, and making land available to, meet the overall needs and demand for housing that arise in South Gloucestershire in an ambitious and responsive way.
- 1.44 The Council's approach to Filton Airfield also indicates that the Core Strategy does not allow for sufficient flexibility. Paragraph 10.7a states that if the airfield does not come forward then the Council will not seek to compensate with alternative

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housing provision elsewhere. The Council has indicated that it may consider an early review of the Core Strategy should this change in circumstance arise. If for any reason Filton Airfield does not come forward, the need and demand for housing will not change. It is essential that the Core Strategy allows sufficient flexibility to deliver this capacity elsewhere.

- 1.45 As stated above, the Core Strategy currently places too great an emphasis on housing delivery in the latter half of the plan period. This over reliance on development in the 2021/22 to 2026/27 period again further restricts the flexibility provided through the Core Strategy without the need for a review.
- 1.46 The Council's failure to identify a range of small to medium sized strategic sites to support the strategic new neighbourhoods also restricts the flexibility of the Core Strategy. This approach also restricts the ability of the Core Strategy to respond to change or unforeseen events, such as delays to any of the strategic new neighbourhoods.