

**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 7: Spatial Strategy, Location of Development**

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

- 1.24 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 examination hearings themselves.

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

- 1.25 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. Similarly, smaller Green Belt site releases should be identified through the Site Allocations DPD process.

### **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?**

- 1.26 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.
- 1.27 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. To promote sustainable development it is necessary to provide for a range of development, of varying scales, across appropriate settlements.

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

- 1.28 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?**

- 1.29 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.
- 1.30 As such, the Core Strategy fails to deliver the step change in housing provision required by the Planning Framework, 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.
- 1.31 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 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

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housing will not change. It is essential that the Core Strategy allows sufficient flexibility to deliver this capacity elsewhere.

- 1.32 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.
- 1.33 To ensure flexibility, it is also important that the Core Strategy makes provision for smaller scale sites that are currently within the Green Belt to be released during the plan period. To ensure 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.