

**SOUTH GLOUCESTERSHIRE CORE STRATEGY
– EXAMINATION HEARING**

**STATEMENTS ON BEHALF OF PERSIMMON
HOMES AND MAXIMUS DEVELOPMENTS**

MAY 2012

CONTENTS

Introduction	1
Matter 1: Legal Compliance/Procedural Matters	2
Matter 2: Justification – The Evidence Base	Error! Bookmark not defined.
Matter 3: Spatial Portrait, Issues, Visions and Objectives	Error! Bookmark not defined.
Matter 4: Sustainability Appraisal	Error! Bookmark not defined.
Matter 5: Regional Strategy	Error! Bookmark not defined.
Matter 6: Green Belt	Error! Bookmark not defined.
Matter 7: Spatial Strategy, Location of Development	Error! Bookmark not defined.
Matter 8: Provision and Distribution of Housing	Error! Bookmark not defined.
Matter 12: Gypsy and Traveller Provision – Policies CS21 & CS22	Error! Bookmark not defined.
Matter 16: Infrastructure and Developer Contributions	Error! Bookmark not defined.
Matter 17: Green and Community Infrastructure & Cultural Activities, Sport & Recreation	Error! Bookmark not defined.
Matter 18: Renewables	Error! Bookmark not defined.
Matter 19: Design	Error! Bookmark not defined.
Matter 20: Density/Diversity	Error! Bookmark not defined.
Matter 21: Yate and Chipping Sodbury	Error! Bookmark not defined.
Appendices:	
Appendix 1 – Community Facility Audit	

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Introduction

- 1.1 The following Statements have been prepared by Turley Associates on behalf of Persimmon Homes and Maximus Developments, who control land to the east of Chipping Sodbury.
- 1.2 Representations to the Draft Core Strategy (and subsequent proposed changes) were previously submitted on behalf of Persimmon Homes and Maximus Developments. Turley Associates are now instructed to progress these representations at the forthcoming Examination.
- 1.3 The following Statements provide our initial comments based on each of 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 12: Gypsy and Traveller Provision (see separate response submitted by Turley Associates)
 - 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
 - Matter 21: Yate and Chipping Sodbury
- 1.4 These representations will be elaborated further at the relevant Examination sessions.

Matter 1: Legal Compliance/Procedural Matters

Question 2: Is the Core Strategy (CS) in general conformity with the National Planning Policy Framework (the Planning Framework) or, if not, is it possible to introduce modifications without detracting from the Council's overall strategy for South Gloucestershire?

- 1.5 The Core Strategy is not in general conformity with the NPPF as currently drafted. Our concerns relate specifically to the Council's failure to plan positively for sufficient levels of growth, and the approach taken to the Green Belt.
- 1.6 The Council is continuing to fail to plan for suitably ambitious levels of growth over the plan period. The available evidence sources demonstrate a need for housing delivery in excess of the 26,435 dwellings proposed by the Council. This situation is exacerbated further by the Council's proposed move towards housing provision being expressed as a maximum target, rather than a minimum requirement. Again this fails to plan positively for future growth, or to provide sufficient flexibility to changing circumstances throughout the plan period.
- 1.7 The Core Strategy fails to reflect the requirement for a 'step change' in housing provision and also to ensure genuine choice and competition in the availability of land. The Council's approach to the extent and strategic purposes of the Green Belt continues to prevent the Core Strategy from planning for, and making land available to, meet the overall needs and demand for housing that arise in South Gloucestershire in an ambitious way.
- 1.8 We are also concerned with the Council's approach to the Green Belt, and in particular its evidence base (Strategic Green Belt Assessment, December 2011) that has informed the Council's position. The Council has failed to prepare a comprehensive review of the Green Belt, instead providing a document that provides no justification for the additional locations that have been identified for release.
- 1.9 As per our other representations, this position should be resolved through modifications to the housing provision set out in **Policy CS15**, specifically basing its requirement on the 2008 household projections (e.g. 33,000 over the plan period). This increase in provision can be met without compromising the Council's Green Belt strategy, given the availability of suitable, and sustainable, strategic non-Green Belt sites (e.g. land to the east of Chipping Sodbury) and more localised non-strategic releases from the Green Belt through the Policies, Sites and Places DPD process.