

**SOUTH GLOUCESTERSHIRE CORE STRATEGY
– EXAMINATION HEARING**

**STATEMENTS ON BEHALF OF PERSIMMON
HOMES, ASHFIELD LAND AND CHARLTON
ESTATES**

MAY 2012

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ID No. 4032065

24 May 2012

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Date of Issue: May 2012

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 11: Affordable Housing/Rural Exception Sites/Extra Care Housing

Question 1: Is the policy consistent with the Planning Framework?

- 1.57 To accord with the NPPF, **Policy CS18** should be amended to have regard to the importance of economic viability on affordable housing provision. In particular through the deletion of the wording that 'requires' developers to achieve 35% on-site provision. These issues are addressed in greater detail below.

Question 3: Is criticism of the affordable housing policy to 'require' 35% on-site provision reasonable given that the supporting text (para 10.27) acknowledges that the economic viability of sites will be a factor to be taken into account?

- 1.58 Our clients retain their objection to the Council's proposed wording in **Policy CS18**, which 'requires' developers to achieve 35% on-site provision. Whilst it is recognised that Paragraph 10.27 of the supporting text refers to economic viability of individual sites, it is important that specific reference is also made in **Policy CS18** itself. This would ensure consistency and clarity in the Council's approach to affordable housing. This change would also allow for off-site provision or a financial contribution where it can be robustly justified (as per the requirements of Paragraph 50 of the NPPF).

Question 4: Should there be more flexibility in the policy to recognise the constraints on affordable housing supply because of present economic difficulties?

- 1.59 Policy 50 of the NPPF makes it clear that affordable housing policies should be "*sufficiently flexible to take account of changing market conditions over time*". As such, it should be clear within **Policy CS18** itself, rather than just the supporting text, that the Council will take account of economic viability when applying affordable housing requirements.
- 1.60 Paragraph 173 of the NPPF states that to ensure viability, the costs of requirements such as affordable housing, "*should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owners and willing developer to enable the development to be deliverable*". This again emphasises the importance of recognising the need to take account of economic viability when considering affordable housing provision.

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Question 5: How closely should affordable housing provision be reliant on future increases in house prices?

- 1.61 Paragraph 177 of the NPPF requires any affordable housing requirements to be assessed at the plan-making stage where possible, and kept under review. By allowing sufficient flexibility within **Policy CS18** it will be possible for future increases in house prices to be taken into account during Section 106 negotiations (through site viability appraisals).

Question 6: Off-site or financial contributions in lieu of on-site affordable provision will be considered in exceptional circumstances. Is there a need to clarify what factors might be taken into account?

- 1.62 It is not necessary to set out specific factors in the Core Strategy itself. Such issues should be dealt with on a site specific basis.

Question 8: What evidence is there to support the provision of 35% of units as a proportion of affordable housing provision in specified locations in the North Fringe and Yate?

- 1.63 There is no clear evidence base to justify the need for, or deliverability of this approach. The proposals also conflict with the flexibility which is identified at Paragraph 10.55 of the Core Strategy, which states that any Extra Care units (including any affordable units) will only be provided where it is viable and appropriate to do so. The Council should adopt a flexible approach to enable a level of provision based on relevant local needs and demands across the lifetime of the plan.