

**SOUTH GLOUCESTERSHIRE CORE STRATEGY
– EXAMINATION HEARING**

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

MAY 2012

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TA Ref: PERA2009
LPA Ref:
Office Address: 10 Queen Square
Bristol
BS1 4NT
Telephone 0117 989 7000
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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 14: Strategic Transport and Accessibility

Question 1: Is the strategy based on a sound and rigorous assessment of the transport needs of South Gloucestershire?

- 1.65 The Core Strategy (Incorporating Post Submission Changes) is not based on a sound and rigorous assessment of the districts transport needs. The key element of transport assessment work associated with the impact of the CPNN has only very recently been completed, e.g. subsequent to the issue of the Post Submission Changes document and there is an element of 'cart before the horse'. There are also notable differences between what was proposed and what is now part of the emerging transport strategy for the North Fringe.
- 1.66 Notwithstanding the above, as part of pre-application discussions with South Gloucestershire Council, our consultant team has been party to some of the detail behind the Transport Strategy to support the Core Strategy development proposals for the North Fringe. As part of this work South Gloucestershire has developed a Core Strategy model to assess the impact of the proposed development and a package of transport proposals to mitigate impact, and provide a step change in travel options, particularly in relation to public transport. Our consultant team has not being given sufficient detailed information as yet to complete a thorough audit of the model. Our team has, however, attended briefing sessions which on the face of it suggest and indicate that the model has been developed on the basis of an appropriate methodology for assessing transport needs in the North Fringe. We are not yet in possession of all the facts in relation to the modelling work, particularly in relation to affordability and deliverability, and therefore we are not in a position to confirm the above statement.

Question 2: Has sufficient regard been had to the impact of future development strategies of neighbouring authorities on levels of congestion and movement?

- 1.67 It is not specifically clear on the consultation undertaken with neighbouring authorities on the impact of the future development strategies. South Gloucestershire has discussed the Core Strategy development proposals with Bristol City Council (BCC), but it is not yet known on the impact of the development on the local highway network, particularly on key arterial routes in to Bristol City Centre, or indeed BCC's view on the transport mitigation package and residual impact. Equally it is unknown what has been included within the model in relation neighbouring authorities strategy for non committed development growth. The

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Transport Assessment prepared in relation to our clients site has been prepared to an agreed scope which BCC have had input to.

Question 3: Is sufficient priority given to public transport improvements to reduce reliance on the car?

- 1.68 Notwithstanding a technical justification of benefit derived from public transport improvements, it is considered that the Core Strategy development proposals promote a step change in public transport provision up to 2026 within South Gloucestershire and neighbouring authorities. This is required to sufficiently mitigate any adverse impact associated with the attraction of private car trips to/from Core Strategy development proposals.
- 1.69 For the North Fringe, the Core Strategy model predicts a 125% increase in public transport demand between the 'Reference' case (Committed development and infrastructure schemes – no Core Strategy sites) and the 'Do Something' case (Core Strategy sites plus transport mitigation package for CPNN). This would be achieved through a lower than average car mode share for trips to/from the new neighbourhood, together with a substantial mode shift to public transport for other trips in the North Fringe. This shift would be due to the delivery of major public transport infrastructure within the North Fringe. The assertion of the modal switch has not been tested, however, it cannot be disputed that the strategic transport package is prioritising public transport improvements as a requirement for not only justifying the Core Strategy development proposals, but also for addressing existing travel movements. This recognises that there is a deficiency in the existing public transport infrastructure.

Question 4: Is the delivery of transport initiatives in Policy CS7 realistic in view of economic uncertainties?

- 1.70 As noted above, it is extremely difficult to answer this question based on the information available. It is acknowledged that some of the strategic transport infrastructure proposals have a delivery mechanism already in place (Greater Bristol Bus - North Fringe to Hengrove Package etc. There is, however, no information in relation to the delivery strategy for the majority of the package proposals or indeed costs associated with the delivery. It is therefore difficult at this stage to assess the economic background to the proposals to understand if the transport initiatives can be delivered. This is particularly difficult without knowing how much financial onus is passed on to developers, which may have a significant bearing on the economic viability of development projects. Additionally it is of

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concern that the transport initiatives are part of an overall package which should be viewed as a combination of measures, the non delivery of certain measures has the potential of adversely affecting the overall transport strategy for the area.

Question 5: Will Policy CS8 provide an adequate basis for improving accessibility in South Gloucestershire?

- 1.71 On the face of it yes as it covers the majority of key components of improving accessibility. We do, however, feel that the policy lacks clarity and detail of some of the points raised (including parking noted below).

Question 6: What evidence is available to justify the 50% limit on garage spaces contributing to parking provision in major residential schemes?

- 1.72 No evidence is provided in the Core Strategy (Incorporating Post-Submission Changes) other than to say residents often use them for storage and therefore 50% will be able to contribute to the parking requirement. It is accepted that garages are used for storage but the proposed policy could lead to over provision of car parking. Lower parking may well be appropriate in certain locations, particularly as strategic transport infrastructure starts to be implemented that will encourage trips by sustainable modes. It suggests that perhaps there is a disconnect between parking policy and the promotion of a public transport strategy. This is generally a specific point that is included within a fairly non-specific statement, without the context of the parking policy wrapped around it.

Question 7: Should the policy make clear how car parking will be addressed?

- 1.73 There is no mention of parking associated with NPPF and how South Gloucestershire will accommodate parking. The indication is that the Council has recently commenced an early review of Parking Standards and will shortly be consulting on its proposals. It is accepted that this is an important demand management tool, however, there is no real steer provided in the Core Strategy on an acceptable mechanism for determining parking provision in residential developments. We feel that the policy needs to strengthen this information and guidance provided to residential development sites.