

**SOUTH GLOUCESTERSHIRE CORE STRATEGY
– EXAMINATION HEARING**

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

MAY 2012

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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 3: Spatial Portrait, Issues, Visions and Objectives

Question 1: Does the Spatial Portrait provide a reasonable snapshot of the area and the issues which face it?

- 1.5 We have some specific comments regarding the Spatial Portrait and the 'Key Issues' identified.
- 1.6 Paragraph 2.3 of the Pre-Submission Draft (March 2011) and Core Strategy (Incorporating Post-Submission Changes) (December 2011) correctly recognise that the East Fringe of Bristol and Yate/Chipping Sodbury have seen substantial growth. It, however, goes onto state that *"this expansion is currently contained by the Green Belt and motorways"*. This is incorrect in relation to Yate/Chipping Sodbury given that further growth is not contained by either the motorway or the Green Belt to the north of Yate or to the north and east of Chipping Sodbury.
- 1.7 To provide a clear understanding of the issues facing the area, direct reference should be made within the 'Key Issues' to the role of the Green Belt in determining how the overall Core Strategy is formed. Historically, the Green Belt has been identified by the Council as a limit/constraint to further growth in the district. This continues to be the case through the current Core Strategy. Paragraph 1.39 states that the Council *"has sought to limit the impact of new housing development on the Green Belt"* and *"remains in principle opposed to significantly reducing Green Belt to accommodate land for housing growth per se"*. How the Green Belt is addressed through the Core Strategy, whilst managing the need for future growth, is therefore a clearly a key issue. Given the Council's position it is fundamental that strategic non-Green Belt development is maximised in appropriate and sustainable locations. A further key issue is ensuring that provision is made for non-strategic development sites on the edge of the urban area, which could be valuable in meeting the sustainable needs of the area.
- 1.8 We strongly agree with the identification of managing future development, and specifically accommodating new housing and jobs as a key issue. It is, however, fundamental that the Council account for an appropriate level of future development over the plan period. Paragraph 3.8 recognises that despite the recent economic downturn, *"it is anticipated the rate of growth will return to normal levels in the future"*. This is a key issue and is not currently reflected in the Council's wider strategy set out elsewhere in the Core Strategy. This issue is picked up in more detail through our response to other matters being considered as part of this Examination.

Question 2: Are the Strategic Objectives broadly consistent with the aspirations of organisations and the population and do they provide appropriate goals for the Council to pursue?

- 1.9 The strategic objectives are broadly consistent with national planning policy and provide appropriate goals for the Council to work towards. We do, however, have concerns with the manner in which the Council propose to deliver the strategic objectives through the wider Core Strategy.
- 1.10 We are particularly concerned by the Council's failure to plan positively for growth as per the requirements of the NPPF. By failing to do so, the Core Strategy does not set sufficiently ambitious targets for housing development across the district. The Council's approach to the Green Belt also threatens to undermine the delivery of the wider strategic objectives set out in Section 4. These issues will be addressed in more detail through our further representations submitted in response to the Inspector's questions, and at the Examination itself.

Question 3: Are there any visions which the Council has put forward which are inappropriate or unrealistic?

- 1.11 The vision put forward for Yate and Chipping Sodbury is considered to be inappropriate. The vision states that a new neighbourhood north of Yate will be provided to enable Yate and Chipping Sodbury *"to meet locally generated housing requirements, provide a broader employment base and provide opportunities for modern flexible working practices, enhancing their sustainability"*. This new neighbourhood alone will not fulfil the 'vision' set out for Yate and Chipping Sodbury. Despite being complementary, the towns are distinct settlements. As such, it is important that strategic development is brought forward through the Core Strategy that addresses the housing, infrastructure, community facility and employment requirements for both Yate and Chipping Sodbury.
- 1.12 The importance of bringing sufficient development forward at Yate and Chipping Sodbury, which in large is not constrained by Green Belt designations, is heightened by the Council's intention to *"limit the impact of new housing development on the Green Belt"*. This strategy means that sustainable strategic sites in non-Green Belt locations should be brought forward ahead of large Green Belt releases. Land to the east of Chipping Sodbury is also unconstrained by Green Belt designations, and provides an opportunity for a further sustainable urban extension. Our clients control circa 58 ha of land to the east of Chipping Sodbury that is outside of the Green Belt and is capable of delivering a mixed use

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development, including circa 700 dwellings, a primary school and a range of community facilities.

- 1.13 This will be considered in more detail in our further representations to Matter 21 and at the Examination itself.