

8 February 2013

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Dear Ms Thorne

SOUTH GLOUCESTERSHIRE CORE STRATEGY - ADDITIONAL HOUSING SITES

This statement is prepared on behalf of our client, Taylor Wimpey UK Ltd, in relation to the Inspector's invitation to submit written representations to the further hearing session scheduled for 7 March 2013. It should be read in the context of our previous representations made at earlier stages of the Core Strategy process, together with our appearance at the Examination in Public. Our clients have a specific interest in land at Mangotsfield, on the East Fringe of Bristol (within the South Gloucestershire administration boundary).

Our clients have joined with a housebuilder/developer consortia to prepare a joint response to the two matters set out in the Inspector's note dated 10 January 2013. A copy of this statement (ref: 20979/A3/SP/JMM) is appended and forms part of our formal response.

We continue to support the view that the housing target set out in the Core Strategy has not been objectively assessed. As established by Barton Willmore, if an objective assessment was to be carried out there is a need for a requirement of at least 33,000 dwellings over the plan period. The attached joint statement also establishes that, as currently drafted, the Core Strategy will not deliver a five year supply of sites to 2016/17. As such, there is a need to identify additional sites to meet this residual shortfall in five year supply (of at least 909 dwellings). To meet this requirement, the attached joint statement establishes that a number of sites should be brought forward, including our clients land at Mangotsfield.

As set out in the attached table, the anticipated timescales and delivery rates for our client's site at Mangotsfield demonstrate that it is deliverable and achievable within the five year period. The completion levels set out are realistic, given sufficient support from the Local Planning Authority. The site has previously been subject to a full planning application, which was subsequently withdrawn as a result of uncertainty due to changes to national planning policy, and therefore extensive site investigations have already been carried out on the site. These have further confirmed that the site is deliverable and achievable and that there are no significant constraints that would prevent it coming forward. Critically, the site is in the freehold ownership of Taylor Wimpey which, again, serves to demonstrate that it can be brought forward for development without delay.

As set out in the attached statement, there is a need to deliver a number of additional sites over the plan period rather than just the one site identified as a 'backstop' by the Council (Morton Way, Thornbury). As demonstrated by the attached table, and our previous representations, our client's site is in a sustainable location and is available and suitable for housing development, which could take place without any adverse impact on the purposes of the Green Belt designation in this location. The attached statement also demonstrates that our client's site meets the five main criteria identified by the Inspector when considering the relative merits of the sites proposed. These matters are considered in more detail below.

Degree of Coherence with the Plan's Vision and Spatial Strategy

Land at Mangotsfield can be brought forward through the development management process, or as a non-strategic Green Belt release through Policy CS5 of the Core Strategy. This would allow for such sites to be brought forward through future Site Allocation DPD documents, or Neighbourhood Plans. We are, however, concerned that Policy CS5 as currently worded through the proposed modification set out in MM7 does not allow sufficient flexibility and is not positively prepared as required by the NPPF. As per our previous representations, we do not consider that the modification set out in MM7 (as amplified by Appendix B), sets out an accurate reflection of what was agreed at the Examination. During these discussions it was concluded that an appropriate range for non-strategic sites in the Green Belt would be between 120 and 130 dwellings. The figure of 30 dwellings set out in MM7 does not therefore accurately represent the discussions. The size and capacity of any non-strategic release from the Green Belt should be a result of an objective assessment of the capacity of the site in the context of its role within the Green Belt. As per our previous representations, Policy CS5 should therefore be amended to reflect that non-strategic releases in the Green Belt can comprise schemes of up to 130 dwellings, not 30.

Site Capacity

The site has capacity for up to 130 units and it is anticipated that at least 117 could be delivered within the five year period. Given that the site has been subject to a previous planning application in 2009 (which was subsequently withdrawn in 2010), detailed technical work has been undertaken confirming that there are no significant constraints to development. Likewise, the proposals have been subject to, and informed by, extensive public consultation

Deliverability

The site is in the sole ownership of our clients, Taylor Wimpey UK Ltd, who are one of the leading national housebuilders. As stated above, a full planning application has previously been prepared and submitted to the Council in respect of this site. This technical work is capable of being updated quickly allowing resubmission within a short space of time. The application would be submitted in detail rather than as an outline, and would be developed by our clients directly. As such, there are no constraints to the delivery of the site and the development would be brought forward with the delays typical of other sites.

Infrastructure Provision

A full technical submission was undertaken as part of the full planning application submitted in 20XX. This demonstrated that the site can be brought forward without any significant infrastructure provision.

Transport Connections

The site is in a highly sustainable location, within close walking distance of a range of services and facilities including shops, foodstores and other services and facilities at Mangotsfield. Likewise the site is accessible to employment opportunities and has access to a large number and range of sporting and leisure opportunities.

The site is also immediately adjacent to a secondary school and is well served by public transport. Connections to the existing highway network can also be easily made.

Assimilation into the Existing Settlement Pattern

The site is surrounded by built development on three sides and could be easily assimilated into the existing settlement pattern. The site is also located within the ring road, which helps to assimilate the site within the existing settlement pattern rather than appear as part of the open countryside. The site does not form a useful role within the Green Belt and could be brought forward without any negative impact on the purposes of including land in the Green Belt. We would recommend that the Inspector visits the site himself (if he has not already done so) as this will demonstrate that visually and physically the site can be incorporated in to the existing settlement.

We look forward to the opportunity to explore the above issues in more detail at the forthcoming hearing session.

Yours sincerely

Alistair Macdonald

Associate Director