

**DOWNTON PARISH COUNCIL'S STATEMENT
FOR THE INSPECTOR AT THE EXAMINATION IN PUBLIC FOR
THE SOUTH WILTSHIRE CORE STRATEGY**

- 1.1 Downton Parish Council (the PC) are supportive of the proposed level of housing for the village identified in both the Submission Draft of the South Wiltshire Core Strategy (SWCS) and the Focussed Changes thereto as approved by Wiltshire Council (WC) Members (i.e.190 new dwellings during the plan period).
- 1.2. The PC's reasons for wishing to be involved in the Examination In Public of the SWCS are concerned with representations made on the Focussed Changes by Savills, on behalf of Persimmon Homes, that the level of proposed housing in Downton should be raised to 300. Therefore, this statement is primarily concerned with the content of those representations, rather than commenting on the SWCS per se.
- 1.3 Persimmons have drawn the Inspector's attention to an officer's report to the WC Full Council meeting of 22 February 2011 and claim that report 'recommended provision of this amount of dwellings [i.e. 300] at Downton'. Persimmons then make reference to an addendum to the report being 'presented' to the Full Council meeting, but fail to acknowledge that the contents of this addendum were recommended for approval by officers, and indeed were so approved by Members.
- 1.4 The addendum identified a proposed level of new housing for Downton of 190. The Vice-Chairman of the PC addressed the Full Council meeting, which was also attended by the Clerk and one other Member of the PC. The recollection of those who attended from the PC is that the figure of 300 was never considered by WC Members at the Full Council meeting. This was confirmed in an email from the Team Leader Spatial Planning dated 23 June 2011, an extract from which is appended to this statement (Appendix A)
- 1.5 Persimmons claim that the recommendation by officers of 190 new dwellings being an appropriate and sustainable level of growth in Downton (a figure which it must be remembered had already been recommended by officers, approved by Members and submitted to the Inspector for consideration on a previous occasion) came about entirely as a result of political intervention.
- 1.6 It is acknowledged that prior to the Full Council meeting the PC had made its concerns known to Members of WC, having been astonished to discover that a document had been published suggesting that 300 new dwellings could be accommodated in Downton. It should be noted that this figure was higher than any that had been suggested by WC during the entire SWCS process.
- 1.7 In response to the PC raising these concerns, the then Portfolio Holder for Economic Development, Planning & Housing, advised that the figure had arisen due to the 'perverse application' to Downton of the methodology for calculating the distribution of housing across the SWCS area, as contained in

WC's Topic Paper 20 (TP 20). This was confirmed in an e-mail, an extract from which is appended to this statement (Appendix A).

- 1.8 Therefore, the extent of 'political intervention' in officers recommending to Full Council a figure that had previously been recommended, approved by Members and submitted to the Inspector, was purely the identification and rectification of an error.
- 1.9 Persimmons express a preference for the methodology for identifying proposed housing numbers at Local Service Centres (LSCs) contained in TP 20, over that contained in the Second Addendum to Topic Paper 3 (TP 3). It is clearly for WC to explain why either methodology is appropriate but, for the avoidance of doubt, the PC is of the view that the TP 3 methodology follows a more logical and consistent path.
- 1.10 Persimmons go on to make comment on the characteristics of Downton and why, in their view, it is suitable to accommodate a number of dwellings (i.e. 300) that has never been properly considered, and much less endorsed, by WC.
- 1.11 The Inspector will be aware that Persimmons have an interest in adjoining sites in Downton identified in WC's Strategic Housing Land Availability Assessment (SHLAA) as having the combined potential to accommodate 165 dwellings (SHLAA sites number 200 and 208). The PC has concerns that the land identified in the SHLAA submission does not incorporate all of Persimmons' potential interest in the area. Indeed, at an informal meeting about the sites, held in September 2010 at the developer's instigation, Persimmons presented the PC with a plan already showing a larger combined site area than that submitted for the SHLAA. A copy of the plan provided by Persimmons at that time, with the extent of the SHLAA sites also indicated, is appended to this statement (Appendix B).
- 1.12 Core Policy 1 of the recently published consultation document on the Wiltshire Core Strategy continues the approach of the SWCS in identifying that LSCs will provide for modest levels of development. Persimmons' view is that, for the purposes of identifying appropriate levels of growth, the LSCs of Downton, Mere and Tisbury should be considered as a group. However, this does not take any account of each LSC's relationship with its respective Community Area (CA) and does not therefore represent a spatially distinctive approach.
- 1.13 The other settlements located within the CAs centred on Mere and Tisbury are generally poorly served in terms of services and facilities and thus have a great day-to-day reliance on the LSCs. By contrast, as demonstrated by WC's Settlement Strategy, a significant number of the settlements located within the Southern CA benefit from a good level of services and facilities and in fact have very little relationship with Downton at all, much less as an LSC.
- 1.14 Furthermore, the majority of settlements located within the Southern CA are closer to and/or benefit from far better accessibility to and from Salisbury compared to Downton and subsequently have far stronger day-to-day ties

with the city than their alleged LSC. This is acknowledged on Page 102 of the book *A Sense of Belonging*, by John Chandler, which WC has relied on in identifying the geographical extent of CAs for the purposes of the SWCS.

- 1.15 The reality is that Downton properly serves as an LSC for itself and the settlements within the parish of Redlynch and no more. It is therefore illogical to claim it should or could sustain more than half of the entire housing numbers identified as being appropriate for the Southern CA.
- 1.16 Persimmons make a further direct comparison between Downton and Tisbury in stressing the latter's location within the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty (AONB). However, their representations are silent on the relationship between Persimmons' site in Downton and the AONB.
- 1.17 Persimmons' site, at least so far as it is identified within the SHLAA submission, currently comprises undeveloped agricultural land within 500 metres of the AONB. It is the view of the PC that any enlargement of the site would be likely to result in a significant detrimental impact to views of the landscape towards and from within the AONB. This is particularly the case as land levels within the AONB rise sharply to the west and the site lies at the floor of the River Avon valley, on the eastern side of which are the northern extremities of the New Forest National Park (NP). Views of the landscape towards and from within the NP would therefore be similarly compromised.
- 1.18 Persimmons' representations are also silent on the relationship between Downton and the NP. The NP Authority (NPA) have consistently expressed concern over the recreational and transport pressures that would arise within the NP as a result of the levels of housing proposed in the SWCS for Downton and the wider Southern CA.
- 1.19 The PC is aware that at the submission draft stage of the SWCS process, the NPA entered into a Statement of Common Ground (SCG) with WC whereby it was intimated that a subsequent Development Plan Document could identify appropriate measures for mitigation of impact on the NP.
- 1.20 Whilst this element of the SCG referred to dwelling numbers across the Southern CA, it must be noted that part of the Downton parish boundary immediately adjoins the NP boundary and the current village housing policy boundary is within 1 kilometre of that shared boundary. Any development within the settlement is therefore likely to have a major impact on the NP. The SCG of course relates to a document that identifies 190 as an appropriate level of new housing in Downton.
- 1.21 Section 3.4 of a report entitled 'Changing patterns of visitor numbers within the New Forest National Park, with particular reference to the New Forest SPA' and commissioned by the NPA in 2008 examines recreational pressure on the NP and estimates an increase of almost 200,000 in the number of visits per annum to the NP by people residing within 1 kilometre of the NP boundary over the course of the SWCS plan period.

- 1.22 The PC remains to be convinced on whether realistic mitigation measures could be achieved at even that level of new housing (ie 190), but any increase in the levels of proposed growth in Downton would be likely to lead to a degree of recreational and transport impact on the NP that cannot be reasonably mitigated.
- 1.23 The NPA has repeatedly raised concerns at the level of housing proposed so close to the NP boundary, given the potential impacts on the protected landscape and habitats of the Park. WC has a legal duty to consider impacts on the adjacent NP and this is acknowledged by SWCS Core Policy 15 which emphasises that development will only be permitted where it does not have a negative impact on the NP.
- 1.24 In its representations on the Focussed Changes to the SWCS the NPA has expressed disappointment that the proposed number of dwellings across the Southern CA has only been reduced by 25% (i.e. from the submission draft figure of 740 to 550). It is therefore inconceivable that the NPA (a Statutory Consultee to the SWCS) would support a 58% increase in new dwelling numbers within a settlement that immediately adjoins the NP.
- 1.25 In terms of further mitigation measures, the PC is of course aware and accepting of the principle of planning obligations being used to provide and improve infrastructure and facilities in support of new development. However, there is a serious concern over the capacity of the village Primary School to admit pupil numbers that would arise from new development.
- 1.26 The current Primary School site does not have the physical capacity to be developed any further and, at their meeting with the PC, Persimmons admitted that a development of the size they were considering would not warrant the provision of a new school. The advice from the Local Education Authority (LEA) was apparently that a minimum of 600 dwellings would be required for this.
- 1.27 The construction of 300 dwellings in the village would therefore be likely to be subject to a planning obligation under which the developer would be required to pay a commuted sum to the LEA for use as it best sees fit. In such circumstances, the PC would have strong concerns that children living in Downton would have no choice but to attend schools in other areas, which the PC would see as a non-sustainable approach in terms of both carbon emissions and community cohesiveness. A letter confirming the Primary School's position on the matter is appended to this statement (Appendix C).
- 1.28 Persimmons comment next on WC's justification for the recommendation made to Members on the actual occasion of the Full Council meeting in February 2011. These are clearly issues for WC to properly address, but the PC would wish to comment further on the following:

Completions at Downton:

Completion figures provided by WC indicate that 122 dwellings have been constructed in Downton during the last 15 years, including the first 5 years of the SWCS plan period. This equates to an average of 8.13 dwellings per annum. The construction of 190 dwellings during a 20 year period as proposed by the SWCS would equate to an average of 9.50 dwellings per annum. Thus the PC does not agree that the WC approach would 'penalise' the settlement for 'poor delivery' during the plan period to date.

Notwithstanding that Persimmons have no mandate to offer an opinion on how the village is feeling, the figures simply amplify the view that 190 is about the right level for continuing sustainable growth in Downton. The figures provided by WC are appended to this statement (Appendix D).

SHLAA sites:

The PC accepts there are sites within Downton that are potentially suitable for development, including that in which Persimmons have an interest. However, it is not accepted that the availability of such sites should have any significant influence on assessing what would be a sustainable level of new development in any settlement.

Justification to relocate 'Downton's target' elsewhere:

'Downton's target' under the SWCS was and remains at 190 dwellings. This was the figure recommended to and approved by WC Members at two separate stages of the process. It is the only figure that WC has submitted to the Inspector for consideration. The provision of 190 new dwellings in Downton over the plan period would certainly not result in an 'acute undersupply' and the PC is not aware of any substantive evidence having been provided by Persimmons to support this claim.

- 1.29 In conclusion it has to be said that the PC remains disappointed that, within the context of a reduction in proposed housing numbers of 20% across the SWCS plan area and 25% across the Southern CA area, the proposed number for Downton has remained static. Logic dictates that, within this context of overall decrease, it would be utterly perverse to suggest that proposed housing numbers should be increased in any settlement.
- 1.30 Nevertheless, throughout the SWCS process, the PC has taken a pragmatic and consistent view that the provision of 190 new dwellings in Downton over the plan period is a sustainable and appropriate level, and would continue the rate of growth that has allowed the village to thrive whilst not becoming overwhelmed with new development. The PC therefore remains supportive of the SWCS Submission Draft and Focussed Changes, insofar as they relate to Downton.

SWCS Core Documents referred to in this statement:

- TOP/20: Topic Paper 20
- TOP/03 C: Second Addendum To Topic Paper 3
- STU/06: Strategic Housing Land Availability Assessment
- STU/41: Footprint Ecology: Changing Patterns of visitor numbers within the New Forest National Park, with particular reference to the New Forest SPA
- STU/46: A Sense of Belonging – History, community and the new Wiltshire

APPENDIX A

Relevant extracts from emails:

From David Milton sent Thu 23/06/2011 13:44 the Parish Clerk for Downton:

The figure of 300 was never formally approved by the Council and was just a product of an ongoing review by officers. As you know, this was revised before it ever went to a committee. It is unfortunate that the timetable meant it that the higher figure was included in the published papers before the revision was made. However this fact does not prejudice the proper democratic mandate as given by the Full Council to the lower figure, which was indeed to final conclusion of the review. The higher figure was simply part of technical work that goes into this kind of review. I assure you that when such a review is conducted there are a myriad of options and figures considered and tested. It does not give them any weight as an output.

Best wishes

Dave Milton
Team Leader Spatial Planning (South Office)
Economy & Enterprise
Wiltshire Council

From Cllr John Brady on Wed 16/02/2011 09:59 sent to the Parish Clerk for Downton

I have spoken to Officers and they have advised me as follows:

This is a result of the perverse application of the methodology used in determining the revised figures. Downton as you rightly point out has been affected adversely and this will be fixed by an amendment when this is debated at full Council.

Kind Regards

John

John Brady
Wiltshire Councillor for Salisbury St Martin & Cathedral Ward
Cabinet Member for Economic Development, Planning & Housing

APPENDIX B

Plan provided to PC by Persimmons

APPENDIX C

Letter from the Headteacher of Downton Church of England Primary School

APPENDIX D

Downtown's Housing completion figures from 1996-2011 provided by WC

1996 /97	97/ 98	98/ 99	99/ 2000	2000 /01	01/ 02	02/ 03	03/ 04	04/ 05	05 /06	06/ 07	07/ 08	08/ 09	09/ 10	10/ 11	Total Net Completions
1	-1	0	9	2	4	32	4	18	4	2	4	1	11	31	122