

## **Submission Statement to Independent Examination into the South Wiltshire Core Strategy Review DPD**

Submission on behalf of Mr Peter Bradshaw (Landowner – Longhedge site, Salisbury)

Submitted by Steve Briggs (Partner, Chartered Town Planner, BSc DipTP DipDBE MRTPI) of Smiths Gore.

The following submission sets out the position in advance of the Examination hearings.

The following summary reflects the key points made in the original written submission to the Wiltshire Council Review document and this is followed by specific responses to the questions raised by the Inspector.

### **Summary of position re proposed 'focussed changes' in relation to Longhedge (Old Sarum) – FOC/04**

- The Submitted Draft South Wiltshire Core Strategy Document is considered to be based upon well-researched and formulated evidence, thorough analysis and professional assessment and a well-conceived strategic approach. As submitted this plan will deliver the required outcomes and meet the objectives and needs of the area.
- In relation to the Longhedge (Old Sarum) allocated site the case has already been well-made by the Council, and supported by evidence and representations, concept masterplan and support from the landowner.
- The proper planning approach for the Longhedge site dictates that it should not be considered in a piecemeal way and that the full benefits and delivery of a high quality scheme of development are dependent upon a comprehensive approach being taken to the overall site.
- There appears to be no logic to the Council's position as represented in their proposed 'focussed changes'. Having previously carried out full consultations and assessments and concluded that the 800 dwellings for the Longhedge site was acceptable and deliverable, they seem to have now arbitrarily decided that 450 is the right number without any real change in circumstance or evidence.
- In order to ensure proper delivery of the CS it is essential that sites allocated are tested and properly assessed in terms of viability and deliverability. At 800 dwellings and 8 hectares of employment land the Longhedge site 'stacks up'. With a reduction of 350 dwellings the deliverability of a well-planned and coherent development that brings with it the required level of infrastructure and community facilities has to be seriously questioned. At the very least, a partial allocation with a 'promise' of more to come will not help to ensure a well-planned and high quality development that supports a balanced community. For the sake of just 350 dwellings the comprehensive approach to delivering a sound and well-planned development should be adopted.
- The English Heritage concerns have been discussed and the original objection has been tempered during the lead up to the Examination and during the hearing session itself, through the offer of guarantees to involve EH in the detailed masterplanning process and to ensure a graded approach to housing density as the development extends further north. The northern part of the site will be

more dominated by structural landscape and tree and hedge planting with the buildings taking a subservient role in the landscape. The site is large enough to successfully accommodate this approach. This position formed the basis for the Statement of Common Ground agreed with the Council on 19 February 2010.

- Nothing in terms of the site context, physical circumstances or fundamental planning policy context has changed since the original evidence was given in support of the Longhedge (Old Sarum) site, except for a somewhat contrived reassessment of the site in the light of the seemingly arbitrary decision to reduce housing numbers. Therefore it is considered that the Submission Draft SWCS should be adhered to as a 'sound' and 'legal' DPD and the proposed changes now put forward by Wiltshire Council should be rejected.

The following points are in direct response to the questions raised by the Inspector in his Hearing Programme document of 1<sup>st</sup> July 2011 in relation to the Independent Examination into the 'Review' and proposed changes now put forward by Wiltshire Council.

## **Issue 2 – Evidence supporting revised housing and employment figures**

As a general point, the proposed change to reduce the delivery figure for housing down from 12,400 to 9,900 appears somewhat arbitrary and gives the impression of being based upon an objective set to get the number below a certain figure, 10,000, rather than to ensure that the requirement and need for housing development is delivered during the Plan period.

The high level of need for affordable homes and the level of demand for market houses, as identified in the Strategic Housing Market Assessment (see page 13 of Topic Paper 20) seems to have been conveniently dismissed and the reasoning behind the decision not to try to meet the identified level of housing required is based upon somewhat vague notions of 'appropriateness' and an anecdotal view of what might be regarded as 'unusual for SHMAs' - not really hard evidence. The reliance upon 'windfall' provision has been brought forward by the Council to support the reduction in housing numbers proposed but here the Council acknowledges that this provision may not be delivered and that further land may then need to be allocated. This is not considered to be a sound position to adopt.