

SOUTH WILTSHIRE CORE STRATEGY (REVIEW) EiP

ISSUE 5

IMPLICATIONS FOR STRATEGIC ALLOCATIONS AND INFRASTRUCTURE

HEARING STATEMENT

Respondent No. 812:

Savills, on behalf of Barratt Southern Counties

July 2011



- 1. What are the implications of the revised housing and employment figures on the delivery of the Strategic Allocations identified in the Core Strategy and the Infrastructure associated with these, including the Transport Strategy?**
- 1.1 In considering the representations on the Core Strategy Review 'Focused Changes', the Inspector has listed an overarching Matter in relation to the implications for the Strategic Allocations. In respect of the total quantum of housing allocated to come forward, clearly there has been a reduction through the removal of Netherhampton Road Strategic Allocation in its entirety, and part of the Longhedge Strategic Allocation from Core Policy 2, the merits of which is for the Local Authority to present a case upon.
- 1.2 Numerically, the Council has maintained its position of needing to deliver 300 dwellings per annum (6,000 dwellings) at Salisbury City and Wilton during the lifetime of the Plan period. That said, it is seeking a reduction in the quantum of dwellings to come forward from identified Strategic Allocations within its Core Strategy, which if deemed sound by the Inspector, would mean an increased need to ensure the front loaded strategy is not compromised through the delay and non-delivery of the other retained Strategic Allocations.
- 1.3 In respect of Hampton Park II, numerically, the Council has maintained its desire to see the site come forward and deliver 500 dwellings early within the Plan Period. To this end, the principal conclusions from the review of the Core Strategy have little, if any, implications on the delivery of this Strategic Allocation. However, the changes proposed by the Council, both 'Focused' and 'Consequential', go further and beyond what can be considered as a 'consequence' of the abolition of the SW RSS, upon which the Review was based.
- 1.4 The remit in which the Council was afforded by the Inspector to make changes to the submitted Core Strategy was indeed focused, and yet, the proposed changes to the Hampton Park II Template bear no relevance to this remit and the implications of the abolition of the SW RSS upon which they have been formed.
- 1.5 The Inspector has Savills' Pre-Examination representation on these changes (CON/45), the content of which will not be repeated in full within this Hearing Statement. There are however some pertinent points which need to be expanded upon, through which a case is made that the Template within the Submitted Core Strategy should be that deemed sound, incorporating the changes already agreed between Savills and the Council within the Major and Minor Changes.
- 1.6 Principally, in reviewing its Core Strategy and proposing changes to the document still before the Inspector to find sound, the Council will have needed to have formed an updated evidence base upon which to base such changes. For the residential and employment land requirements, it will be for the Council to present a case that it has completed this process in a 'sound' manner.

- 1.7 However, there is no new or updated evidence base to support the proposed wording changes to the Hampton Park II template from that used to justify the submission draft Core Strategy in March 2010. As such, the changes proposed within CON/45 are lacking in any 'robust and credible evidence base', and cannot therefore be deemed sound.
- 1.8 One of the principal changes proposed by the Council includes the term 'significant' in respect of the Strategic Gap to be retained between the Strategic Allocation and the village of Ford to the north. To set the context for the Inspector, during the Examination into the submitted Core Strategy in March 2010, the Council defended the identification of Hampton Park II, and indeed formed the parameters to the location of the residential units, Country Park and 'Strategic Landscape Gap' within the submitted Core Strategy (P.145 July 2009 Proposed Submission Draft).
- 1.9 At that time, save for those representations made by Savills and other participants in respect of the wording of the Strategic Allocation Templates, no other party provided evidence to say that the diagrammatic map within the Template was flawed, or indeed, unsound. At no point therefore, has the location of the residential development nor the scope or scale of the 'Strategic Landscape Gap' been questioned in evidence at the Examination in Public.
- 1.10 The introduction of the term 'significant' therefore is flawed and unsound for a number of reasons:
- The change proposed is not as a 'consequence' of any of the Focused Changes or within the remit set by the Inspector to which the Council were permitted to propose changes to the Core Strategy. By definition therefore, it cannot be a 'consequential' change to be considered at the EiP.
 - The change is not supported by any new or supplementary evidence base in respect of landscape and visual impact assessment. The only evidence base the Council has is that used to justify the scope and form of the Strategic Allocation as per the submission draft, and which has not been questioned previously during the March 2010 Hearing Sessions.
 - The Council acknowledges within the Statement of Common Ground with Savills submitted to the Examination (February 2010) in respect of this Strategic Allocation, that the Planning Application currently pending decision by the Secretary of State was submitted '*in general accordance with the emerging Core Strategy*' (Paragraph 9).
 - There is no definition of 'significant' within the Core Strategy Review document (Topic Paper 20). Such a definition is to be left for agreement between the Authority and a community forum, of which again there is no definition of what this would constitute. Given the Council on 22 February 2011 re-affirmed its position that it wants to see early delivery of 500 dwellings from Hampton Park II, then it must be concluded that the extent of land area for

residential development cannot be materially different from what currently exists within the submitted Core Strategy.

- As part of the S.78 Appeal Process into the Planning Application for Hampton Park II, the Council has entered into a Legal Agreement based upon the Development Template included within the submission draft, which sets out the scale and form of the Country Park and the facilities to be delivered within. Any change to the Template would be at odds with this Legal Agreement and the principles to delivery to which the Council has deemed acceptable not only in March 2010 at the EiP, but subsequently through the S.78 Appeal process.

- 1.11 The proposed amendments to the Development Template for Hampton Park II as listed in CON/45 are ill-conceived, at odds with the Council's evidence presented at the EiP in March 2010 and simply cause uncertainty at a time when the Council is failing to deliver its front loaded strategy. Furthermore, the changes are not as a 'consequence' of any Focused Change the Council will be seeking to justify to the Inspector at the Hearing Sessions.
- 1.12 To this end, Savills would respectfully ask that the Inspector dismiss the changes included within CON/45 and revert to the submission Development Template which is still before the Inspector to find sound. Furthermore, as noted within Savills' Pre-Examination Representation, the Inspector still has before him the Major and Minor Changes published following the Examination in March/ April 2010. Many of the changes included within are the subject of agreement between parties to overcome previous objections, which the Council has not included within the Changes listed for consideration in the forthcoming Hearing Sessions.
- 1.13 In general, the implications of the Review into the Core Strategy have meant the delay of more than one year in the production of the Core Strategy, during which time the supply of open market and affordable housing has worsened. With regard to housing need and demand, the Council cannot demonstrate a 5 year land supply against the former Structure Plan, SW RSS or even its Locally Derived Housing Requirement now proposed (but yet tested) in the absence of delivery from the Strategic Sites.
- 1.14 The Local Housing Needs and Market Survey (2010) provides the most recent data for South Wiltshire (former Salisbury District) in respect of housing need and shows a worsening picture to that reported within the published Housing Needs Survey in 2006 and presented at the Core Strategy EiP in March 2010. The Survey concludes that the outstanding affordable housing need within South Wiltshire equates to an average of 930 dwellings per annum after taking account of supply from existing stock turnover, an increase from an identified need of 702 dwellings per annum as cited within the 2006 Survey.

- 1.15 The overriding implication therefore of the Council's changes is a heightened need to have a Core Strategy found sound and soonest, to allow for the much needed delivery of new open market and affordable housing, particularly within Salisbury City.