

South Wiltshire Review: Core Strategy

Further representations from Catesby Property Group (Reps 29-32)

Matter 6: Netherhampton Road and Longhedge.

What evidence is there to support the deletion of the site south of Netherhampton Road and part of the site at Longhedge as opposed to other sites?

What alternatives to the deletion of these sites have been considered and why were they rejected?

Introduction.

Catesby Property Group are the key investors and developers behind the Longhedge strategic site at Old Sarum north of Salisbury. Since we had not confirmed and concluded our interest in the site at the time of the previous Examination in January 2010, we were not formally represented at the previous Inquiry, although we did attend as observers. However, the landowner was ably represented at the previous EIP by their agents, SmithsGore.

We have now indicated a wish to appear at the Examination in Public in August 2011 and therefore our submissions should be read in conjunction with those of Steven Briggs from SmithsGore. Catesby will focus primarily on the Longhedge site.

Background.

Wiltshire Council devised the Core Strategy over a two year timescale from 2007 to 2008 which involved a prolonged period of preparation, several rounds of consultation, detailed technical assessments of the various strategic sites and in-depth discussions with officers, members and technical staff.

Topic Paper 19 (which is produced in two parts, one in February 2008 and one in July 2008) explains the lengthy processes which the Council went through to decide on the sites which should be developed. They also consulted the landowners and developers involved to ensure that the sites could indeed be developed. Delivery is now regarded as a key criterion in any planning assessment.

The Longhedge site, (previously labelled as the Beehive site and prior to that Old Sarum) has consistently emerged as one of the key front-runners for development and the landowner and his agent have therefore progressed with a Master Plan and undertaken investigative work on that basis. It is located immediately adjacent to the Beehive 'park and ride' site and performs well in the Sustainability Appraisal work. It appears as 'white' land on Maps 1 & 2 of Topic Paper 19.

Paragraph 6.1 of Topic Paper 19 indicates that 53% of people agreed or strongly agreed with allocating land at Old Sarum, the second highest out of all the strategic sites. Furthermore, the minutes of the Technical Consultative Group in June 2008 (included as Appendix 3 to Topic Paper 19) show that the site was preferred by the previous Local Plan Inspector over the Fugglestone Red site.

The site has long been earmarked as providing 800 dwellings and has latterly also been promoted as an employment site to help relocate firms from the Churchfields area in the middle of the City. It has been supported throughout by the officers at the South Wiltshire Examination.

Possible Factors influencing the deletion of part of Longhedge.

It would appear, from the explanation in Topic Paper 20, that the Council has chosen the deletion of the Netherhampton site (and part of the Longhedge site) simply on the basis of the outcome of the 'traffic light' Sustainability Appraisal (within Appendix A), although it is still not clear whether environmental factors or the reassessment of needs have driven the reduction.

The fact that these two sites are allegedly vulnerable to de-allocation as a result of a re-assessment of the Sustainability Appraisal, necessitates a sharper examination of the robustness of the Sustainability Appraisal methodology to ascertain whether the scoring is fair or indeed whether the right criteria have been used in the first place.

Several questions arise in relation to the Sustainability Appraisal methodology:-

1. **Deliverability:** Why are the brownfield sites excluded completely from the review irrespective of their ability to deliver? A closer inspection ought to be made about their deliverability. This has now been brought into sharper focus arising from the Government's removal of brownfield targets.
2. **Sensitivity of scoring:** The differences in scores in the assessment are sometimes very finely balanced, meaning that a fine (and sometimes subjective) judgement can mean lost points. The Longhedge site undoubtedly suffers from this
3. **Sustainability:** taking forward the above point, Longhedge has 14 objectives achieved on 'sustainability' against 16 for Fugglestone Red, resulting in the relegation from yellow (3 points) to orange (2) – one perhaps needs to look at these more closely. In truth, like Fugglestone Red, Longhedge has the advantage of making the existing Old Sarum site (which is currently under construction) more sustainable, which ought to boost its score.
4. **Heritage** There are two scores for heritage, (known and potential). This amounts to double counting. Because Longhedge gets a red (1 point) for both, in practice 2 valuable points are lost against all three other sites – a very damaging outcome.
5. **Transport:** Longhedge only gets an orange (2 points) for transport criteria, whereas it has a Park & ride terminus immediately adjacent to the site, with only a 10 minute journey into the City (quicker and more conveniently located than Fugglestone Red). It also has main roads radiating out to Amesbury with good access to the A303. Two others get a yellow (3).
6. **Consultation:** The consultation criteria are the most subjective. In the case of Longhedge, it only scores a red (1 point) as does Netherhampton. It is not clear why. But the Hampton and Fugglestone sites score yellow (3), despite also having some strong objections. If the English Heritage comments (as we suspect) have influenced the score to give Longhedge a red (1) then, combined with Heritage above, this effectively amounts to 'triple counting' against Longhedge. Furthermore, there is a comment in the text that 'no one is signed up to deliver the site'. This is not correct as Catesby's presence at the Examination shows. (Who would have put forward this information?) The ability to deliver has not been used in relation to the brownfield sites.
7. **Flooding:** Does the FRA does put Fugglestone Red above the other three sites?
8. **Place shaping:** Fugglestone Red gets a green (4) because it helps to improve facilities for the existing adjacent residential area. But so too does the Longhedge site, so arguably it should get (4 points) too, albeit the reduction in size of the site would limit the capability to do this.

Our preliminary findings: From this very simple and cursory analysis, the amended outcome of the Sustainability analysis could potentially produce a very different result giving Longhedge up to 5 additional points and thereby possibly moving the site into second place. A much more careful analysis will need to be done before or during the Examination, if this is the basis for choosing (and deleting) sites.

The issue of visual impact.

Whilst concerns have long been expressed by English Heritage about the views of the upper slopes of the site from Old Sarum monument, these were discussed at length at the previous Examination and a Statement of Common Ground agreed between the Council and English Heritage which introduced mitigation measures to resolve EH's concerns. This appears on the Council's website.

It is surprising that effectively English Heritage is able to backtrack on a previously agreed statement without reference to the LDF process or consultation with the landowner, who was involved in the previous agreement. In any event, it is the intention of the landowner and developer is to protect the upper slopes from higher density development and to create suitable vistas from Old Sarum monument. Since the upper reaches of the site may not be developed for many years, there is ample time to introduce sensitive screening where necessary to avoid obtrusive views.

It is unclear whether the visual evidence presented by English Heritage (in the form of a second bite of the cherry) is the key factor which has threatened the Longhedge site and which has resulted in the proposed reduction from 800 dwellings to 450 dwellings. If so, it will be important to clarify why the Council's stance has changed. It is unreasonable to introduce new (undeclared and unspecified) factors in isolation, still less to allow one particular consultee to influence the Core Strategy out-with the normal planning process.

The Newmarket Case.

The Inspector has drawn the participant's attention to the Forest Heath case involving a site at Newmarket. The Council has now presented a revised strategy with no clear alternatives and has chosen to reject one site (south of Netherhampton Road) and reduce another in size (Longhedge) without considering other possibly alternatives which might be preferable and without prior consultation with the landowners involved. We consider it is debatable whether this could conflict with the SEA directive and whether the precedent created in the Newmarket case could apply. However the danger of potential delay caused by such a challenge is an unnecessary risk which should be avoided.

Conclusions.

The Council has undergone an exhaustive site selection process to identify the key strategic sites. Longhedge emerges as one of the strongest candidates in that it gives the current development at Old Sarum a greater critical mass and the scope to provide a more balanced development (including homes and jobs) which is well linked to the City Centre both by bus, bike and car.

If the Council consider there is a need to re-assess the allocation of sites, they should re-assess the Sustainability Appraisal and consider a more objective set of criteria, including deliverability and practical relationship between homes/jobs. All the strategic sites are 'greenfield' and several occupy prominent positions within the countryside. They all have their merits and drawbacks. However, any review should also call into question the brownfield sites too – especially whether the Churchfields site is genuinely expected to come forward at the pace which the Council anticipates.

We are not convinced that the approach taken in the revisions is justified and we reject the notion that the Longhedge site should be reduced in size as proposed. In our view this decision is both unnecessary and undesirable and contrary to good planning practice.