

**South Wiltshire Core Strategy EIP. Statement relating to the Examination of issues associated with Focussed Changes.
English Heritage, 22 July 2011.**



Revised Core Policy 2 (FOC/04) limiting development to the lower part of the Longhedge site, Old Sarum, Salisbury

1. English Heritage has consistently opposed the extensive development of the Longhedge site, the case being set out in the EIP statement ref HS/English Heritage/1863/3.
2. The case against development of the upper slopes of the Longhedge site is reinforced by national policy PPS5 Planning for the Historic Environment, issued during the EIP in March 2010, the associated PPS5 Practice Guide, and The Setting of Heritage Assets: English Heritage Guidance (Draft for consultation August 2010). These clarify how to understand the significance of a heritage asset's setting and how that setting should be considered and where appropriate, protected and enhanced.
3. This policy and guidance confirm the need to protect the setting of heritage assets, particularly those of national importance and where that setting plays a significant part in the value of that asset.

¹ Old Sarum - John Constable, 1829 Oil on canvas. Victoria and Albert Museum, London
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4. The policy and guidance also reinforces the conclusions of the evidence already gathered and the case made by English Heritage which demonstrate the sensitivity of the landscape setting of Old Sarum (both as a scheduled monument and Grade 1 listed building) and the substantial harm to it that would be caused by any development of the upper slopes at Longhedge.
5. With this in mind we therefore welcome the Council's review and reconsideration of the allocation of Longhedge at Old Sarum. We note the Topic Paper (20) recognises a distinction between the relative sensitivity of the upper and lower parts of the site and an appreciation of the body of evidence which very clearly demonstrates the substantial harm to a nationally significant heritage asset from development of the upper slopes of the site, contrary to PPS5 Planning for the Historic environment (March 2011).
6. The Council confirm in its Topic Paper (point 15.1) that to be sound the Core Strategy must be consistent with national policy.
7. We therefore **accept a revised Core Policy 2 (FOC/04) limiting development to the lower part of the Longhedge site**, a 20 ha development of 12 ha/450 homes (35dph) and 8 ha of employment, subject to the associated revisions to the place shaping requirements in the Development Template at Appendix A, page 164 set out in the relevant English Heritage/Wiltshire Council Statement of Common Ground. Please refer to paragraph 2.7 of EIP statement ref HS/English Heritage/1863/3.

Upper slopes of the Longhedge site providing the Core Strategy's housing contingency/strategic reserve (proposed change 5.46 (b), FOC/05).

1. An appreciation of the unsuitability of the upper slopes provides the rationale for the adjustment of Core Policy 2 to reduce the allocation to the lower slopes. However the proposed change of Core Policy 2 does not reject the principle of development of that most sensitive part of the site as implied, or remove it from the Core Strategy.
2. In effect the Core Strategy is proposing development of the whole of the Longhedge in 2 phases.
3. English Heritage cannot support the notion of the upper slopes of the Longhedge site providing the Core Strategy's housing contingency or strategic reserve (proposed change 5.46 (b), FOC/05). Either development of the upper slopes is considered to be unacceptable or it is not.
4. Topic Paper 20 page 43 section 14.2 sets out how the local authority would respond to a situation where the development of new housing may not be completed at the anticipated rate - apparently regardless of the reasons for this. It indicates a number of sites (Netherhampton Road, Salisbury Hospital, Longhedge upper slopes and the numerous Salisbury Vision sites) can be held in reserve and be available for development as the contingency. However only Netherhampton and the upper slopes of Longhedge are referred to in the proposed changes (FOC/05).
5. One therefore can only presume that the local authority consider the principle of development of the upper slopes of Longhedge to be acceptable contrary to the evidence base, SEA and the advice of English Heritage.

6. It should be noted that the whole of the Longhedge site was initially considered to be acceptable in principle by a site selection process set out in Topic Paper 19 - *Identification of strategic growth areas: Paper 2*, July 2008. However this exercise preceded the *Salisbury Historic Environment Assessment*, April 2009 that found that development of the upper 2/3rds of the site would cause substantial harm to the significance of Old Sarum. If such evidence had been available for the above site selection process and SHLAA (May 2009) the upper slopes of Longhedge may not have been considered. Therefore it is vital the 2008 site selection process or SHLAA is now used to determine suitable contingency sites. Contingency must be informed by all available evidence including the *Salisbury Historic Environment Assessment*.
7. Why do Netherhampton and the upper slopes of Longhedge have to provide the housing contingency for the whole of the South Wiltshire? Won't the Salisbury Hospital site, the Salisbury Vision sites and the opportunities that would come forward via the proposed Site Allocations DPD provide a more appropriate and suitable contingency portfolio?
8. In addition, at 5.46(b) in the Submission version of the Core Strategy, the SHLAA is referred to as having identified "in the region of 1000 additional homes", the suitability of which would be determined through the Site Specific Allocations DPD. We believe it would be reasonable to retain this in the Core Strategy as an appropriate contingency rather than including the unsuitable upper slopes of Longhedge. **We therefore object to deletion MIN/47.**
9. **English Heritage therefore also objects to the proposed change FOC/05 at paragraph 5.46(b) which proposes the upper slopes of Longhedge and Netherhampton as the Core Strategy's housing contingency.**

10. The additional text at 5.46(b) states that only should it be considered necessary will the “*deliverability*” of Netherhampton and the upper slopes at Longhedge be considered during the preparation of the Site Allocations DPD. This again implies the sites are considered to be suitable and appropriate, but perhaps not deliverable. English Heritage argues that the upper slopes of the Longhedge site are unsuitable, inappropriate, contrary to national planning policy and therefore undeliverable. We have no comment to make in relation to Netherhampton Road.
11. Surely the Council already has all the necessary information to take a view on the *deliverability* of the upper slopes of Longhedge and Netherhampton? If not what information does it require to do so? No evidence has been provided to indicate the development of the whole of the Longhedge site, including the upper slopes (contingency of 350 homes) is essential to achieve a viable or sustainable compact development.
12. It is disappointing the local authority is proposing to relocate 8 ha of its traditional industrial base from Churchfields in Salisbury to Longhedge at Old Sarum, a relatively more inaccessible location, in open countryside, within the setting of a national significant historic landmark and designated special landscape area. The adverse environmental impact of this further cumulative urbanisation of such an ancient and culturally significant landscape is of great concern to English Heritage. Harm to Old Sarum must not be exacerbated by a proposed 2nd phase of development on the upper slopes of Longhedge when the local authority has already determined there are likely to be far more suitable and deliverable alternatives consistent with national planning policy.

Miscellaneous issue for consideration - Applying prescriptive housing targets for the individual strategic housing allocations

1. English Heritage has already made representation on this matter in its statement (ref HS/English Heritage/1863/3) regarding the danger of presupposing a site's development capacity before the community has been involved in the intended masterplanning of that site, and before critical design issues have been applied to inform the design process.
2. The current tensions relating to the proposed development of the Hampton Park strategic allocation illustrate the danger of applying pre determined site capacity figures. The Core Strategy identifies the site for 500 new homes, however a submitted planning application has highlighted the difficulty of actually delivering 500 new homes without compromising other Core Strategy objectives and design expectations for the site. If the 500 figure was an approximate guide to the site's capacity then that figure could have been adjusted by the masterplanning process.
3. Further to a masterplanning exercise it may be that the appropriate housing figure could be lower or indeed higher than the figure in the Core Strategy. Unfortunately the consequence of applying a rather crude or artificial capacity in the Core Strategy is that it is then a minimum figure regardless of the implications.
4. We therefore suggest the capacity of each strategic allocation in the Core Strategy is referred to as an approximate/aspirational or guide figure.