

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

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

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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 6 – .....Longhedge**

In their Submission Draft CS and in their evidence and argument during the Examination in 2010, the Council provided a robust and well-argued defence of their allocation at Longhedge. The only real objector to the allocation in terms of the visual impact and impact on the wider landscape setting of the Old Sarum Scheduled Ancient Monument (SAM), was Ronan Torkildsen of English Heritage and during the course of the run up to the original Examination and during the discussions at the hearings, an accommodation was reached between the Council (and Landowner) and EH, recognising that the detailed masterplanning for the Longhedge site would enable full consideration to be given to the potential visual impact issues raised by EH.

A key factor and piece of evidence that needs to be highlighted in respect of the validity of the position now adopted by the Council concerning Longhedge and the environmental concerns raised by EH, is that the scale and capacity of the Longhedge site is such that the Submitted Draft CS (considered in the Examination in 2010) has demonstrated that due to the overall capacity of this 53 hectare site, there is more than enough scope to accommodate the originally allocated 8 hectares of employment land and 800 dwellings without the need to develop the whole site area and allowing for the following:

- extensive structural planting,
- development well set back from the A345 so as not to in any way obscure the view of Old Sarum,
- sufficient scope to provide for a graduated and reducing density of buildings as the site progresses northwards, and
- plenty of space to provide open space and woodland planting so as to create a completely different character for the northern and more exposed half of the site.

Another key consideration in relation to the position now adopted by the Council in respect of the Longhedge site, is that it contradicts the position that they adopted along with English Heritage in the Statement of Common Ground (dated 19 February 2010) submitted as evidence at the Examination in 2010. That statement was produced to reflect the key points raised above concerning the approach to be taken to the Longhedge site within the detailed masterplanning process. In that SOCG, the Council referred to the Longhedge site and the fact that “prioritisation has been given to locations for development that will best contribute to building sustainable linked, mixed-use and balanced communities”. Clearly Longhedge is still such a site.

In the SOCG, the Council and English Heritage reached agreement in the following terms in relation to Longhedge:

*Agreed position*

*In order to ensure that the environmental capacity of the site and important landscapes and views are conserved through the development management process it is agreed that the Development Template at Appendix A, page 164 is revised under sub-heading ‘Place shaping requirements’ to include:*

- *Density and building height of development will vary in response to the visual sensitivity of different parts of the site allowing a balance between built and ‘green areas’ with a higher density of development in the Southern part of the site through to predominantly ‘green/planted areas’. This ‘topographical progression’ of development would be matched by a ‘structural landscape/green infrastructure progression’ in order to minimise visual impact and help to maintain an appropriate landscape setting for Old Sarum.*
- *Retaining and strengthening the landscape elements of the site to inform the layout of development and allowing it to relate, respond and assimilate with the surroundings.*
- *Embedding the majority of the new development within a newly established network of green corridors and strategic landscaping.*
- *Ensuring the design responds to a detailed analysis of the historic environment; safeguards key views to and from Old Sarum and; integrates the sites important archaeology.*
- *Overall building mass is in keeping with the rural setting.*
- *Lighting does not exceed the height of the development and is designed to minimise light pollution and skyglow. Lighting should not impinge on the views of Old Sarum.*
- *There are no alterations, (unless essential in the interests of road safety and gaining access to the site – issue to be agreed at master planning stage), to the line of the Roman road and*

*long views of Old Sarum are preserved as vehicles travel southwards along the A345 (old Roman road) by containing development within the site by structural roadside planting.*

In other words, the Council in supporting their allocation and the key objector to the Longhedge site, EH, understand clearly that with the proper application of urban design skills and a determination to produce a well-planned and sensitive layout for the site, a high quality and appropriate development can be accommodated on the Longhedge site that respects its wider setting and ensures the delivery of much needed employment and housing development. To now be saying that the highlighted issues of concern around the visual impact of the development of towards the northern end of the site are such that a reduction of houses is required is clearly an untenable position based upon the evidence previously submitted to the examination.

It is considered to be absolutely essential that, in order to create a well balanced and appropriately responsive new built environment at Longhedge, a comprehensive and holistic approach is taken from the outset to the proper planning and design of that community. A half-hearted' approach that looks to develop half of the site and yet suspects that the remainder of the site will come forward in the future, is a recipe for poor quality development and very poor 'place-making'.

It is essential to ensure that the full benefits, community facilities and infrastructure are all delivered, including primary school, local centre, structural landscaping and green infrastructure, play and open space provision, etc. It is also imperative to ensure that the full quota of affordable housing provision is realised and therefore the Longhedge site needs to be planned and delivered in a structured way over the next 15 years. For this to happen, a positive allocation for the whole site needs to be included as part of this Core Strategy document, acknowledging that the scale of development envisaged (800 dwellings and 8 hectares of employment land) should be provided for within a single allocation in order to deliver the high quality development envisaged by the Council, the Landowner and indeed, English Heritage,

In relation to the 'scoring system' ('Sustainability Appraisal objectives' – see Appendix 1 of Topic paper 20) it is important to note that second only to the assessment of Fugglestone Red, the Longhedge site scores highly in terms of 'beneficial impact' with a score of 14. This is a high score and demonstrates the significant attributes of the Longhedge site. It is also argued that the negative score of 6 should really be reduced to 5 as there is double counting on one particular issue. This appraisal process adopted by the Council, which compares one strategic allocation with another is considered to be flawed in respect of the Longhedge assessment. This view is based on three key points:

- Firstly, there would appear to be an element of double-counting in that for Longhedge, the issue of the possible impact upon the landscape has been scored against two categories – no. 16 (To conserve and enhance the District's landscapes) and no. 23 (To protect, maintain and improve the recognised ...heritage....Scheduled Ancient Monuments....). It is considered that as the only reference to a negative impact under the 'heritage' tag (no. 23) was the 'potential' impact on the landscape, in effect, this factor has now been counted twice.

- In Topic Paper 20 Appendix 1, consultation feedback (page 71) highlights the fact that 52.7% of respondents “agreed or strongly agreed” that Longhedge would be suitable for development. Indeed, over 75% of respondents either supported or raised no objection to this allocation. Even accepting a continued objection (modified and reduced in the Statement of Common Ground submitted with the Council at the Examination in 2010), the score of ‘1’ seems a very negative reaction to a generally well supported allocation.
- The major flaw with the scoring system used in respect of the Appendix 1 Appraisal of Strategic Sites is that no account has been given of the major benefit to be derived from allocating land at Longhedge for employment development in order that one of the most favoured sites, Churchfields, can then be delivered for housing. There should be very high beneficial factor attributed to the Longhedge appraisal that properly reflects the fact that without it, one of the most sustainable (brownfield) sites is dependent to a large degree upon allocating land at Longhedge.

**It is important to note that the ‘Submission Draft South Wiltshire Core Strategy Document’, as considered by the Examination Inspector in 2010, is considered to be sound and legally compliant.**