



Client: Country Homes and Gardens plc

**Independent Examination of the South Wiltshire Core
Strategy Review Development Plan Document**

**Written Statement in Response to the Issues for
Examination Identified by the Inspector**

Issue 6: Netherhampton Road and Longhedge

July 2011



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1.0 ISSUE 6: NETHERHAMPTON ROAD AND LONGHEDGE

- 1.1 *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?*
- 1.2 *What alternatives to the deletion of these sites have been considered and why were they rejected?*
- 1.3 As highlighted by the case of *Save Historic Newmarket Ltd v Forest Heath District Council* (2011), compliance with Article 5 of the SEA Directive requires that draft plans and environmental reports operate together, and that the reasons for ruling out alternative policies must be explicit and valid.
- 1.4 We do not believe that the Council's reasons for deleting the site South of Netherhampton Road are either valid or explicit. Whilst a weighting process has been employed to compare Netherhampton Road with Fugglestone Red, Hampton Park and Longhedge, we believe that both the scoring system used, and the scores attributed to the competing sites, are flawed.
- 1.5 The scoring system itself gives insufficient weight to sustainability in comparison to other factors which, whilst relevant, should not be accorded the same weight; sustainability should be the overarching factor in the identification of suitable strategic sites. Netherhampton Road is one of the more sustainably located potential strategic sites in our view.
- 1.6 The scores given by the Council to the competing sites do not accurately reflect either their landscape sensitivity or their relative sustainability. Nor has the Council taken proper account of the positive viability assessment of Netherhampton Road compared to the other strategic sites.
- 1.7 Most fundamentally, the Council has not justified the deletion of Netherhampton Road, a site on the edge of Salisbury, in the context of its stated Core Strategy aim of reinforcing the



primacy of Salisbury. There is an inconsistency in the Council's approach to the allocation of strategic sites.

- 1.8 The Council does not appear to have considered alternatives to the deletion of Netherhampton Road, or if it has this consideration is not made explicit. Topic Paper 20 merely compares the four strategic sites and concludes that the site(s) scoring lowest should be deleted. There is no wider consideration of possible alternative approaches, such as amendments to potential strategic sites to deal with alleged failings.
- 1.9 In particular, the decision to delete land south of Netherhampton Road ignores the possibility that the site boundary could be amended to bring it entirely below the 70 metre contour, in order to address the landscape issue identified by a third party. There is no indication that WYG's earlier representation, suggesting that the Country Gardens land be included within the Netherhampton Road site in order to achieve this outcome, has been taken into account.
- 1.10 We believe the evidence which has been used to justify the deletion of Netherhampton Road is flawed, and that the Council has failed to adequately explore alternatives to its deletion, contrary to Article 5 of the SEA Directive.
- 1.11 The deletion of the site South of Netherhampton Road fails the soundness test of being "justified" (founded on a robust and credible evidence base, and the most appropriate strategy when considered against the reasonable alternatives). The Core Strategy can be made sound by devising an appropriate methodology for comparing strategic sites, undertaking a comprehensive review of the competing sites, and considering a range of alternative strategies for making allocations. We believe that such a process would lead to the reinstatement of Netherhampton Road as a strategic site in the Core Strategy.