



**Wiltshire Council
Local Development Framework**

**SOUTH WILTSHIRE CORE STRATEGY
DEVELOPMENT PLAN DOCUMENT REVIEW**

Examination

**Position Statement for Matter 6: Netherhampton
Road and Longhedge**

July 2011

Contents

Matter 6, questions to be considered	Page No.
Question 6.0: 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
Question 6.1: What alternatives to the deletion of these sites have been considered and why were they rejected? The case of <i>Save Historic Newmarket Ltd v. Forest Heath District Council</i> [2011] EWHC 606 is relevant to this point.	5

Matter 6. Question 6.0 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?

- 1.0 The evidence that led to the conclusion that all strategic sites were not required within the SWCS is set out in Section 5 of Topic Paper 20.¹ Up to date evidence has been assessed as explained in the Council response to Matter 2², which supplements that used to produce the draft South West Regional Spatial Strategy (dSWRSS). In accordance with PPS12 the consideration of up to date evidence led to the conclusion that while the underpinning strategy of the SWCS should remain intact, not all of the housing to be delivered through strategic site allocations (SSA's) identified in the proposed submission draft is central to achievement of the strategy³.
- 1.1 As less land needs to be allocated to meet the strategic needs of the area, there needs to be a clear methodology for seeing which sites may not be required at this time. It is the case that some sites have different constraints, which make them a more sustainable option than others. The starting point for the review was to revisit the original site selection methodology together with the new evidence and implement a finer grain analysis to establish if the sites can be reasonably ranked in order of suitability. At this point, as detailed in Topic Paper 20 (para 10.12 to 10.17) brownfield sites and the strategic allocation at Amesbury were discounted from the detailed review.
- 1.2 Section 11 of Topic Paper 20, set out the methodology that was employed to re-evaluate the remaining Greenfield strategic sites. This comprised taking a systematic and objective criterion based approach to reassess the strategic allocations. This was based on a review of a number of key criteria that were used to identify the individual sites suitability for development. These criteria were: sustainability, landscape appraisal, heritage, transport, water / flooding, biodiversity / wildlife, place making and consultation feedback. This process sets out clearly how the alternative sites were considered and how the conclusions in the outputs of the review were reached. A more detailed description of how the alternative options were appraised is included in Appendix 1 of Topic Paper 20.
- 1.3 The detailed, individual appraisals of each strategic site allocation can be found in Appendix 1 of Topic Paper 20 and in summary while a comparison of their scores against criteria are summarised in the tables in Section 11, pages 26 to 38. The results are as follows, in order of the most suitable site first:

Results of appraisals for Greenfield Strategic Site Allocations, Salisbury	Score
Fugglestone Red	28
Hampton Park	24
Longhedge	21
Netherhampton Road	19

¹ Topic Paper 20, Review of South Wiltshire Core Strategy, sections 5 to 7, pages 7 to 15.

² See Position Statement for Matter 2: Evidence Supporting Revised Housing and Employment Figures

³ See PPS12, page 8, paragraph 4.6 for guidance on the definition of what comprises a strategic site.

- 1.4 It is important to emphasise that these considerations draw on published evidence, such as the Landscape Appraisals and SA/SEA Assessment which comprise the SWCS evidence base. The methodology was designed to produce a cumulative picture of the sites to allow a comparison to be carried out, it does not seek to identify overriding reasons for deletion per se. These do not exist, or a site would not have been allocated initially, rather the assessment allows a balanced picture to emerge of the strongest sites and those less so.

Netherhampton Road

- 1.5 The site at Netherhampton Road was ranked as the least suitable of the sites. It scored comparatively poorly against the other sites when evaluated against following criteria: SA, landscape, consultation feedback and place shaping. Some 29% of its impacts as identified through the SA process were negative, the highest proportion of any of the sites. Conversely the site scores the joint lowest in terms of positive impacts⁴. The SA⁵ in its summary raised the following issues, which summarise some of the potential negative impacts of the development of this site:

An extensive area of search but the eastern part of the site does have good connections with Harnham. Archaeological evaluation and biodiversity survey and assessment required to ensure no harm to heritage interests or SSSI. Potential problems with local highway network need to be addressed. Allocation of employment land is proposed to encourage reduction of travel to work journeys. Development to the south west should be avoided due to landscape concerns. It is recommended that parts of the site should be given further consideration but that the cumulative impact of the development of sites 12, 13 and 14 [see Map X above] on social inclusion objectives, including provision of appropriate facilities, should be carefully addressed as should the impact on the vitality of Salisbury Town Centre.

- 1.6 On grounds of landscape, the Settlement Study highlighted potential issues with the development of the Netherhampton Road site, especially linked to the fact that there are elevated panoramic views from higher ground towards city centre. It also identified the potential for development on this site to compromise visual the physical gap between Salisbury and the Ebble Valley villages⁶. A key discussion at the EIP in March 2010 was around the ‘bluff’ to the south eastern side of the Netherhampton Road site. At the time a compromise was reached to exclude this area from the proposed site. However it is recognised and was acknowledged at EIP that the reason for this was an error in Topic Paper 19 page 55 where this key ridgeline was not translated from the CBA settlement settings study (see footnote 6). This is another factor that meant the site scored comparatively low against the other sites on this criterion.
- 1.7 In the letter from the Chief Planning Officer to Local Planning Authorities dated 6 July 2010 regarding the revocation of draft dSWRSS, it is made clear that Local Planning Authorities should continue to develop LDF core strategies “reflecting local

⁴ See Topic Paper 20, Review of South Wiltshire Core Strategy, page 32, paragraph 11.20.

⁵ SA Page 99 of Appendix V of STU/03 of Area of Search SA – Salisbury Area 13

⁶ The Chris Blandford Associates Settlement Settings assessment (STU/21) (part 2, fig 3.5) through its Visual Assessment

people's aspirations and decisions on important issues such as climate change, housing and economic development”⁷.

- 1.8 The site was particularly controversial during consultation and the consultation representations made during the various stages of the Core Strategy production process are summarised in Topic Paper 20.⁸ Again while it is not the case that this criterion is in its self a reason not to pursue the allocation, and that care must be taken to avoid a popularity poll, it is another factor which contributes to an overall comparison of the sites.
- 1.9 In place shaping terms the site stands a little divorced from the main built up area of Harnham and is therefore challenging to integrate into the community. In this respect this site is much more of a standalone development compared to the other proposed strategic allocations.
- 1.10 Although the proposal includes delivery of a local centre and community facilities for the Harnham area, the existing community is already well served (already having basic facilities such as convenience store, two pubs, church, primary school) so whilst new facilities as part of proposed strategic allocation would be accessible by the existing community, they would not be essential for the existing community in the same way, as say the community facilities being delivered at Fugglestone Red. In this manner there would be comparatively little benefit to the wider area compared to a site such a Fugglestone Red which has the critical mass to provide a local district centre to help provide services and facilities for the people of a much wider catchment including Bemerton Heath and Fugglestone Red (phase 1), which are currently underprovided.

Longhedge

- 1.11 This review indicates that the second least suitable site for allocation is Longhedge. Although the site scored relatively strongly against SA objectives when a finer grain analysis is considered (table 8, page 31 of the review) it scored comparatively weakly against the criteria for heritage, consultation and transport.
- 1.12 There are existing concerns over the impact development of this site may have on heritage assets. In particular English Heritage has raised concerns regarding the development of the northern portion of the SSA, and have stated:

This [development]⁹ should be informed by an appreciation of the limited capacity of the site to accommodate development in the visually sensitive northern part of the site indicated by the LUC Study (pg 74).

Whilst development within the lower portion of the visually sensitive area need not necessarily be precluded, a design response that seeks to retain a visual openness as the site progresses northwards should be pursued.¹⁰

⁷ See letter of 6th July 2010 to Councils from Steve Quartermain, Chief Planner CLG.

⁸ Topic Paper 20, Review of South Wiltshire Core Strategy, Appendix 1, pages 62 to 66.

⁹ Inserted by author

¹⁰ English Heritage Proof to the SWCS EIP ref: HS/English Heritage/1868/3 South Wiltshire Core Strategy EIP statement, Longhedge, Old Sarum, Salisbury, paragraphs 4.1 and 4.2, page 5.

- 1.13 These concerns from English Heritage, together with the evidence within the Salisbury Historic Environment Assessment (SHEA) (STU/23) and summarised in Topic Paper 20, means that this site scores comparatively poorly compared to the others on this criterion.
- 1.14 In addition to the concerns on heritage grounds, the representations made by English Heritage represents the only objection made directly about a strategic site by a statutory consultee, which also contributes alongside the consultation responses detailed in Topic Paper 20 to this site scoring comparatively lowly on the criterion of consultation¹¹.
- 1.15 The Longhedge site also scored comparatively weakly on transport issues. Out of the Strategic sites evaluated in the Transport Study the Longhedge site ranked joint worst of the strategic allocations, specifically scoring lower in bus connectivity, access to the train station and road capacity. As such it was not considered as accessible in transport terms as some of the other sites.¹²
- 1.16 Because of the findings of the review it is considered that the area of this site could be reduced as suggested by English Heritage, in order to achieve the reduction in housing numbers justified by up to date evidence, without having a detrimental impact on the Strategy. This would provide the landowner time to consider and deliver landscaping that could be incorporated into the northern end of the proposed site if deliverable at a later stage. Furthermore the Strategic Sites Viability Study¹³ that has been undertaken confirms that 500 dwellings on this site is viable.¹⁴
- 1.17 In conclusion the new / updated evidence with respect to overall housing and employment numbers led the council to conclude that not all of the strategic sites are required now to meet to objectives of the Core Strategy. The Council has used a robust methodology to evaluate sites to a finer grain which has led to the deletion of the site South of Netherhampton Road and part of the site at Longhedge.

Question 6.1: What alternatives to the deletion of these sites have been considered and why were they rejected?

- 2.0 The consideration of alternatives has been an important part throughout the plan production process and assessing alternatives to the deletion of these sites has been integral to the review.
- 2.1 This consideration has taken a number of forms including the continuation of the strategy as set out in the Submission Document, the detailed assessment of the strengths and weaknesses of other sites and the consideration of potential alternative review methodologies. Importantly, and in accordance with the Save

¹¹ Topic Paper 20, Review of South Wiltshire Core Strategy, Appendix 1, pages 71 to 74.

¹² Wiltshire Local Development Framework Strategic Transport Assessment, by Wiltshire Council, April 2009, Appendix 4, page 37 onwards. EIP ref: STU/52.

¹³ SWCS Viability Study by Adams Integra paragraph 4.15.1, EIP ref: STU/48

¹⁴ See Proof for Matter 5, paragraph 5.4.

Historic Newmarket Ltd case¹⁵, the assessment of alternatives has had the SA/SEA process at its centre and has been made fully open to third parties.

- 2.2 The first alternative considered was to not carry out a review, to leave the strategy as submitted and to not revisit the growth levels. The reasons that the Council considered that the review was necessary and not pursue this course are set out in detail in Topic Paper 20¹⁶. In summary the main reasons for carrying out a review of the levels of growth in the SWCS were:
- Up to date evidence on housing and employment growth.
 - Prudent use of the constrained environmental capacity in South Wiltshire
 - The need to plan for sustainable growth that complies with the aims of PPS1
 - Recognition of Salisbury's dominance in a predominantly rural area
- 2.3 Despite the review, it is a matter of fact that not changing the Submission Draft was an option considered by the Council and as such this in itself represents an alternative to deletion of the sites that has been considered and subject to the proper SA/SEA process.
- 2.4 Section 11 of Topic Paper 20¹⁷, sets out the methodology that was employed to re-evaluate the strategic sites. This comprised taking a systematic and objective criterion based approach to reassess the strategic allocations. This was based on a review of a number of key criteria that were used to identify the individual sites suitability for development. These criteria were: sustainability, landscape appraisal, heritage, transport, water / flooding, biodiversity / wildlife, place making and consultation feedback. This process sets out clearly how alternative sites were considered and how the conclusions in the outputs of the review were reached. A more detailed description of how the alternative options were appraised is included in Appendix 1 of Topic Paper 20.
- 2.5 With regard to the importance of ensuring that the SA/SEA regulations are met (as underlined by the Newmarket case), the methodology employed placed the SA/SEA process at the very heart of considering and comparing the alternative sites. It was the first criterion used when reviewing the sites and this is chronicled on pages 28 to 33 of Topic Paper 20 and subsequently in more detail in Appendix 1. In addition the outputs of the review were subject to a separate SA/SEA process which was published to support the public consultation on the review¹⁸. Therefore the public had (and still have) access to the original SA/SEA on the Submission Document, the addendum which covers the outcome of the review and Topic Paper 20 which sets out clearly how the SA/SEA process was the first means of appraising alternatives.
- 2.6 When consideration of up to date evidence (see Matter 2) led to the conclusion that the level of housing to be delivered through strategic site allocations (SSA's) was no

¹⁵ See the case of *Save Historic Newmarket Ltd v. Forest Heath District Council* [2011] EWHC 606, EIP background paper STU/55

¹⁶ Review of the South Wiltshire Core Strategy, Topic Paper 20, Sections 7.0 & 8 pages 11 to 16

¹⁷ Topic Paper 20, Review of the South Wiltshire Core Strategy, page 28, paragraph 11.6.

¹⁸ Sustainability Appraisal Update Note of Proposed Revision of Submitted Development Plan Document as a Result of the Review, February 2011

longer central to achievement of the strategy¹⁹, it was necessary to identify a realistic and transparent methodology through which to achieve a reduction. At the outset an alternative methodology of identifying the quanta of oversupply and simply applying a pro-rata reduction of each of the SSA's was considered (a salami slicing approach). However on closer analysis this alternative was identified as flawed and not realistic. The approach was seen to be arbitrary, taking little account of the SA/SEA outputs or evidence related to the suitability of the individual sites and introduced problems of viability and achieving a critical mass needed to overcome infrastructure and place shaping barriers. Therefore while reasonable alternatives to the methodology were sought, none could be identified and in accordance with PPS12²⁰, little benefit was seen in inventing alternatives that were simply not deliverable.

- 2.7 The Newmarket Case is important as it underlines the need for a proper and open SA/SEA of reasonable alternatives in plan production, and a fair opportunity for third parties to consider and comment upon those findings. As explained all realistic alternatives as identified in accordance with PPS12 have been subject to the full and open SA/SEA process. This includes the option of not changing the SWCS Submission Document and also building the process into the methodology used to evaluate the comparative merits of each of the sites. The outcome of this latter process was subject to an updated SA/SEA which was published to support the review process and forms an addendum to the full SA/SEA published to support submission, which also remains public.

¹⁹ See PPS12, page 8, paragraph 4.6 for guidance on the definition of what comprises a 'strategic site.

²⁰ PPS12, page 16, paragraph 4.38, 'Alternatives'.