

South Wiltshire Core Strategy DPD

Hearing Statement for Persimmon Homes (South Coast) Ltd.

BACKGROUND

1. It had not been Persimmon's intention to submit a further written statement to this Examination, however in light of the Hearing Statement submitted by Downton Parish Council (DPC) we have considered it necessary to respond. The Inspector will note that DPC's statement is almost exclusively a critique of representations made by Persimmon Homes (South Coast) Ltd on **Focused Change FOC 03** in May 2011. Indeed, paragraph 1.2 of DPC's document states that they are "*primarily concerned with the content of those representations, rather than commenting on the SWCS per se*".
2. The key point of difference is the level of planned growth at Downton, with DPC supporting the target of 190 currently being advanced by Wiltshire Council (WC) following approval by members at the Full Council meeting on 22 February 2011. In contrast, Persimmon supports a target of approximately 300 dwellings.
3. A key point of difference relates to how the 190 target came to arise. Persimmon's last submission highlighted WC officers' original recommendation to committee, which was a target of 300 dwellings at Downton, and showed that this reverted to 190 either on the day of the committee or very shortly beforehand, and in any event after the publication of the initial officers' report and Topic Papers. In our view, the change of recommendation was most likely effected as a result of political expediency and lobbying of officers. In contrast, DPC has argued instead that the change "was purely the identification and rectification of an error" (DPC statement, para. 1.8)
4. Persimmon would take this opportunity to address some of the points raised by DPC, and to crystallise the basis on which a target of approximately 300 dwellings for Downton is justified in the plan period of the SWCS.

EVOLUTION OF TARGETS AT DOWNTON

5. Housing targets for Downton are justified by the rationale set out at Topic Paper 20 ('TP20') in the sections leading up to paragraph 9.30. Essentially, the paper adopts a tiered approach, with Local Service Centres (LSCs), high in the settlement hierarchy, being assigned a target as a discrete grouping, based on an analysis of settlement population, services, roles and functions. After the subtraction of provision elsewhere in the plan area (notably Salisbury, Amesbury and smaller villages) an LSC target of 700 is arrived at, which is then divided between Mere, Tisbury and Downton. Persimmon supports the conclusion at paragraph 9.30 of TP20, which states that Downton should accommodate the largest share, i.e., 300 dwellings, made on the basis of its role and function.
6. The precise course of events in terms of how the target of 300 later reduced to 190 will be a matter for the Inspector to take up with Wiltshire Council officers during the EIP should he wish. However, we would reiterate the following points of fact:
 - In the original version of TP20, freely available on Wiltshire Council's website until very shortly before the 22 February 2011 Full Council meeting, paragraph 9.30 represented the culmination of officers' analysis on the issue. This followed a 'comprehensive review', as

paragraph 5.2 makes clear. The recommendation here was for 300 dwellings at Downton.

- Officers' original report to the 22 February 2011 meeting (see page 107 of the Public Reports Pack) also makes an explicit recommendation for 300 dwellings at Downton.¹
 - The reversion to 190 dwellings is effected only as a result of Agenda Supplement 2, which is dated 21 February, i.e. the day before the meeting. We would draw attention to point 9 (a) of this document, on the second page, which refers to a '**change to the recommendations** relating to the distribution of housing'² (our emphasis).
7. In view of the above, it is quite clear that the change from 300 to 190 dwellings was far more than a technical update. Indeed, it is clear that officers were originally planning to recommend a target of 300, and that this was a figure based on their professional application of the evidence available to them. This contradicts the suggestion made by DPC in their Hearing Statement that the change was "*purely the identification and rectification of an error*" (para. 1.8)", or that it was "*never properly considered*" (para. 1.10).
 8. We see little in DPC's Hearing Statement to counter our suggestion that political expediency was a major factor in the change to the recommendation. Indeed paragraphs 1.6 - 1.7, if anything, would seem to corroborate that interpretation - in particular the references to Parish Council "astonishment" at the target, the lobbying of WC members, and the notion that TP20's methodology for distributing targets had been subject to "perverse application".
 9. If the change was merely the correction of a counting error or similar, then there would have been no need for the additional paragraphs in Topic Paper 20 which attempts to justify the redistribution of 110 dwellings away from Downton. Our representations in May 2011 have critiqued these changes and show them to be flawed for reasons such as that:
 - The use of completions at Downton to justify a reduction in the village's target is inconsistent with the approach taken to Mere and Tisbury;
 - Amongst the LSC grouping (Mere, Tisbury and Downton) the latter is particularly suitable for higher levels of development – as officers originally concluded, based on evidence.
 - Hence, the basis given to redistribute 110 dwellings elsewhere was essentially arbitrary.
 10. Persimmon stands by these points, and in the interests of brevity we would refer parties to its May 2011 representations for a more detailed expansion of the issues.
 11. However, we would draw attention to a critical point which is the allocation of 50 dwellings at Wick Lane (as a 'Phase 2' Local Plan allocation) was always envisaged to be delivered from 2006-2011, a period that overlaps with the current plan period and which has been known about from the outset of preparation of the Core Strategy. It is thus curious that Wiltshire Council have only latterly identified these in the "*analysis of completions that have taken place since 2006 and outstanding commitments*" referred to in TP20 (version 2, paragraph 9.31), on which basis it was concluded that remaining development requirements would be "excessive" if the starting point was 300 rather than 190. To be clear, even with the higher target in place, outstanding housing development would be closer to 200 than to 300 once commitments and windfall are taken into account, and Persimmon does not view this as "excessive" bearing in mind the overall Core Strategy target of 9,900 dwellings.

LANDSCAPE IMPACTS

¹ See: <https://cms.wiltshire.gov.uk/mgConvert2PDF.aspx?ID=944&T=10>

² See: <https://cms.wiltshire.gov.uk/mgConvert2PDF.aspx?ID=14988&T=9>

12. In its Hearing Statement, DPC makes great play of Downton's proximity to the New Forest National Park and the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty (AONB), invoking their presence against both the Persimmon site on Salisbury Road, and housing development in the village more generally. Persimmon recognises that the relationship between development and these designations is an important consideration, but would take issue with some of the points made.
13. In terms of the National Park, while there is clearly a relationship between it and the village, it is far from the case that development at Downton is inherently damaging to it. Whilst the Parish Boundary of Downton may adjoin the Park, taken alone this fact is entirely irrelevant. Downton Parish extends far beyond the village itself in all directions, and no part of the built-up area of Downton is within **650m** of the Park. More specifically, the distance between the Park boundary and the Persimmon site is approximately **1,800m**. This is well beyond the radius of, for instance, casual dog walking that might arise from residents of the development. The map at Appendix I shows the location of the two landscape designations and the Persimmon site.
14. The suggestion that views from within the NP would be "compromised" as a result of development on the Persimmon site is extraordinarily bold, and appears to be based on conjecture and rhetoric alone. We accept that there may be an element of intervisibility across the valley, however it is unlikely that this would amount to anything more than inconsequential glimpses, given the distances involved, landform, extensive screening by trees (which could itself be augmented through the development process), the presence of Downton itself in the foreground of any views from most angles, and the buildings at Downton Industrial Estate adjacent to the site, which are far larger in scale than any dwelling Persimmon would develop. Persimmon has not yet commissioned landscape assessments in relation to potential development at Salisbury Road, however will do so at the application stage, and any necessary mitigation measures can be enforced.
15. In terms of impacts on the AONB, DPC suggests "significant detrimental impact" would result from development on the site. Again, we would suggest that this is ill-informed guesswork. The most detailed landscape assessment to date at Downton is the Settlement Setting Assessment (Chris Blandford Associates, 2008, on behalf of the planning authority as evidence base to the Core Strategy) does explore key issues, and would tend to corroborate our view that development off Salisbury Road need not have any detrimental landscape impact. Our May 2011 representations contain more discussion on this, however most noteworthy is the existence of lower-quality landscape areas which are "not distinctive or supportive"³, and the Persimmon site lies within the larger of these.
16. In effect DPC comes close to advocating a further safeguarding area around the Park, where additional restrictions on development would apply. However indications in Planning Policy Guidance are that this is not a necessary approach. PPS22 (paragraph 14) for instance explicitly rules out the creation of "buffer zones" around national and international designations, and the use of these to resist developments. While PPS22 is concerned with renewable energy, this general principle is, we believe, applicable to housing – which anyway is far less prominent than typical energy developments such as wind turbines.
17. We accept that ecological issues around the Park are a consideration. However, the Appropriate Assessment of the SWCS (Nicholas Pearson Associates, July 2009 for Wiltshire Council) notes at p.38 that necessary mitigation measures can be developed in respect of housing allocations. Further, Core Policy 15 of the SWCS would ensure development will only be permitted 'where

³ See: www.wiltshire.gov.uk/south_wiltshire_settlement_setting_assessment_2008_chapter_8_downton.pdf, figure 8.8

it does not have a negative impact'. Given also the requirement for SEA of the Core Strategy, and in all likelihood EIA on an application, we would suggest there has been much exaggeration of the effects that development targets at Downton would have, whether at the 190 or 300 level.

18. Finally, we would urge all parties not to lose sight of the other central purpose of a National Park designation aside from their protection, which is to promote their enjoyment as a recreational resource for everybody. Bearing this in mind, to suggest that much-needed housing in all the districts surrounding the National Park should be resisted on the basis that future residents might choose to enter the Park for recreation is perverse, and contrary to the intentions of the National Parks and Access to the Countryside Act 1949. In any event, only 14% of visits to the National Park are from local people living within 8km (Nicholas Pearson Associates 2009, p. 35) and so we would underline the need for perspective on this issue.

EXTENT OF HOLDINGS

19. An element of doubt has arisen on the extent of land being promoted by Persimmon at Downton, and for clarity we attach a plan of this site as Appendix 2. This site measures approximately 6.5 hectares and is essentially the same as that illustrated on Wiltshire Council's pro-forma⁴, apart from the addition of a plot of land at the far north to connect with the existing roundabout, and small adjustments on the eastern and western boundaries.

CONCLUSION

20. In summary, Persimmon Homes (South Coast) Ltd considers that:

- The general role envisaged by the SWCS for Downton (i.e. as the Local Service Centre for the area and a future sustainable location for market-led housing allocations) is correct, however the specific plan provision of 190 dwellings is unsound and insufficient;
- Downton is one of the largest settlements in the plan area outside of Salisbury, benefiting from extensive services such as shops, pubs, churches, GP, and primary school. Additionally, unlike the other Local Service Centres it benefits from:
 - Proximity to Salisbury and other centres of population;
 - Excellent public transport (with the key bus route passing the Persimmon site);
 - A strategic employment site (opposite the Persimmon site);
 - A secondary school (c.400m from the Persimmon site).
- The National Park and AONB are important considerations, but concerns over the impacts that modest housing allocations would have on them have been much exaggerated and need to be kept in perspective;
- Reinstatement of the planned target of 300 at the village through a minor change of wording would make this element of the SWCS sound.

21. We would therefore urge the Inspector to effect officers' original recommendations as set out in the original version of TP20 and the original report to Full Council in February; namely making provision for 300 dwellings during the plan period, in line with the methodology and evidence outlined in Topic Paper 20.

⁴ See: http://www.wiltshire.gov.uk/shlaa-200_and_208land_west_of_salisbury_road_downton-2.pdf

22. We would note that the new regime of the National Planning Policy Framework (NPPF) rests upon a “*presumption in favour of sustainable development*”. In relation to housing it should be reiterated that the key objective of the Government “*is to increase significantly the delivery of new homes*” (paragraph 107), and this requires the planning system to deliver sufficient quantity of housing land in the first instance (paragraph 108). To quote paragraph 55 of that document,

‘The application of the presumption should achieve the delivery of enhanced levels of development consistent with national, strategic and local requirements.’

23. In applying the NPPF, Local Planning Authorities should therefore be “*looking for solutions rather than problems so that applications can be approved wherever it is practical to do so*” (paragraph 55). Critically in relation to the Core Strategy, this means Wiltshire Council should create a plan “*with sufficient flexibility to respond to rapid shifts in demand or other economic changes*” (paragraph 14). In summary, it is very clear that the direction of government policy is highly pro-growth, and hence the restrictive target currently suggested for Downton – which has followed expediency rather than evidence – is in our view contrary to that spirit.
24. Finally we would reiterate the findings of the initial SHLAA review of the Persimmon site⁵, which notes in particular that the site is “*relatively unconstrained*”, and that it is in close proximity to a number of Downton’s key services including the strategic employment site, bus route and shop. An indicative capacity of 165 dwellings (on a slightly smaller site than currently being promoted) is referred to, and no particular issues or difficulties are identified. In our view the site is by far the most suitable option for development in the village, a point substantiated by the discounting of most other sites in the village in the May 2009 SHLAA update report (109, 82, 107 and 108), although a further small plot west of Breamore Road (site 195) was also considered suitable. Overall, it is evident from the SHLAA that Downton is quite capable of accommodating modest greenfield housing sites to accommodate the levels development which would follow a Core Strategy target of 300, without detrimental or adverse impacts.

⁵ http://www.wiltshire.gov.uk/shlaa-200_and_208land_west_of_salisbury_road_downton-2.pdf