

Statement of Blanefield Property Co.

HS/DPDS Consulting Group (Blanefield Property)/1397/11

Issue 11: Core Strategy 9 – Old Sarum Airfield

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Issue 11.1 Potential Areas for Development. On what basis were the potential areas for development shown on Map 5 selected. In particular what assessment has been made of the potential effect, positive or negative, that developing these areas would have on the setting of The Old Sarum Airfield Conservation Area, of listed buildings within that area and of the Old Sarum Scheduled Ancient Monument?

1. The Core Strategy is unsound as a result of the two related changes in the schedule of changes submitted to the Secretary of State with the Core Strategy (SWCS/13B) because removal of the potential area for development adjacent to Ford prejudices the delivery of Core Policy 9.

Change 1 - Deletion of Potential Area for Development Adjacent to Ford from Map 5

2. There is no quantum of residential/commercial development associated with Core Policy CP9 and it therefore provides no certainty on where or how much development will be permitted in the potential development areas indicated on Map 5. BlaneField Property Co (BlaneField) supports this format but the corollary is that it must be unreasonable to preclude potential areas for development at the outset.
3. The key lies in the description 'potential' areas for development – they are not allocations. The Statement of Common Ground records that the areas have been identified as those not critical to the preservation of the essential elements of the OSA Conservation Area and/or able to contribute directly or indirectly to mitigation and enhancement proposals. The Statement also recognises that each potential area has constraints and opportunities for the appropriate type and form of development and will be subject to site specific and generic policies in development of the master plan and determination of any eventual applications for development¹.

¹ Appendices F and G illustrate the sort of design ideas and visual analyses that BlaneField has undertaken to date to test the potential for development in the identified northern areas and ensure that development proposals will address these matters and improve and not exacerbate the problems they are intended to address. These items demonstrate BlaneField's commitment to the sensitive development of the site as recorded in the Statement of Common Ground.

4. It therefore cannot be certain at this stage whether the type and amount of development that may be permitted on the northern perimeter of the airfield through Core Policy 9 will be sufficient to secure the benefits sought by the policy and provide sufficient incentive to Blanefield. This understanding will be gained through further work on the long term strategy to clarify the potential scales and types of development elaborated through the master plan, taking policy considerations into account, and the potential indirect benefits to the Conservation Area arising from the potential development e.g. hangar repair, control over flying, signage/maintenance and other works.
5. To reduce the potential areas for development from three to two at this stage, with potential impact on the scale of different types of development sought and agreed to, therefore risks that Core Policy CP9 may not be deliverable. Blanefield therefore cannot agree with the Council's view, indicated in the letter from Mr Cunningham (Appendix A), that the significance of the amendment is "*debateable*".
6. Turning specifically to identification of the potential area for development adjacent to Ford, this should
 - preserve views of and provide a picnic area/viewpoint across the flying field to the listed hangars
 - not intrude on views from the hangars over the flying field and from OS SAM. The area where housing development would not be visible from the hangars has been defined (Appendix B) and the same exercise is required for views from OS SAM
 - avoid noise intrusion from flying activity with the proposed southward relocation of the runway
 - avoid coalescence of Ford and Old Sarum.
 - be most appropriate for housing to complement the existing residential development bordering the airfield.
7. This reflects Blanefield's awareness of both the heritage value of the site and the location's unsuccessful history of (different scales of) housing proposals through applications and the development plan preparation process (Appendix C summarises this history). However, although the Statement of Common Ground confirms that the

areas on Map 5 are indicative and that assessment work is more advanced for the northern perimeter, it is important for Blaneield to clarify that, pending detailed investigation and development of design concepts, this potential area adjacent to Ford is drawn more broadly on Map 5 than will be necessary. This is wholly in keeping with the approach of defining 'potential' areas leading to further evaluation and refinement if appropriate.

8. This indicative area was endorsed when the pre-submission Core Strategy was approved by Cabinet and also received officer support in face of duly made objections to the proposed submission Core Strategy by the Southern Area Board that the areas *'cannot be considered for development'* (COM/1/426 Appendix 2, section 7.4). Nor did similar objections from English Heritage result in recommendation to change the policy.
9. The stated reason for deletion of the potential area for development is *"To safeguard the separate identity of the settlement of Ford and to protect the amenity of its residents"*. Blaneield appreciates Full Council has the right to decide changes contrary to officers' views. However such decisions must be based on planning merits and no compelling planning evidence was presented to justify these assertions (SWCS/13B). In fact it is clear from this Statement (and the Statement of Common Ground) not only that these and other planning considerations are to the fore but also that the separate identity of Ford will not be compromised. In addition development could improve amenity of Ford by providing play areas and public open space.
10. Coalescence and amenity are legitimate planning considerations but similar and other equally pertinent planning considerations apply to the potential areas on the northern perimeter of the airfield. Indeed while Mr Cunningham's letter (Appendix A) refers to the *"number of hurdles"* relating to this potential area for development it also refers to the airfield as a whole being a *"complicated site"* and that its *"problems are also reflected in the responses to the consultation process, which contain a number of concerns, including criticism regarding risk to the Conservation Area and wider historic setting"*. The Council's resolution to delete one area therefore is not based on neutral assessment but on local interest. Blaneield acknowledges that local views are a valid input to policy development and determination of applications for planning permission, however they should not override the balance of material considerations.

11. The airfield is included in the 2009 SHLAA with a contribution of 294 dwellings in years 6-10 (STU/6 Appendix 1). The site appraisal (Appendix D) recognises the potential for housing development but on only part of the airfield because of
- impact of development on the setting of the listed hangars and on the special character and appearance of the conservation area
 - employment development may be more appropriate adjacent to the existing employment area,

Pertinent to the issue under discussion, the site appraisal notes

- *“The existing residential area to the south east may mean that the part of the site immediately adjacent to this area would be more suited to housing development in the interests of residential amenity.”*
- *“In terms of access to facilities and services, the location of this site at the moment for housing development would not be particularly sustainable.” and “The implementation of this consent² will enhance bus services along the Portway and pedestrian cycle links to the city and improve local facilities.”*

12. The revised Sustainability Appraisal for Core Policy 9 (SWCS/15) identifies two ‘benefits’ from deletion of the potential area adjacent to Ford neither of which align with the stated reasons for deletion of the potential area for development adjacent to Ford:

- Compliance with the Core Strategy settlement strategy.
Blanford is aware that Ford has no ‘basic facilities’ and that Core Policy 1 assigns it to the tier in the settlement hierarchy where further housing will not be allowed. However this categorisation seems somewhat misleading because it does not take into account the availability of (and support for) facilities and services immediately north of the Portway as a result of the development in progress there, especially when:
 - TOP/03 C (paragraph 1.13) refers to further investigation of opportunities for modest growth afforded by clusters of settlements at site-specific allocations stage; and
 - Appendix E suggests the distances between Ford and Old Sarum are not inconsistent with those seen between the farthest housing and equivalent

² Adopted Local Plan (LPP/01) allocation immediately north of the Portway for mixed-use development including a primary school and local centre.

facilities in Core Policy 1 secondary centres in the Southern Wiltshire community area. Furthermore Blanefield's initial ideas in this potential area for development include a bus/pedestrian/cycle only route to the Portway to enable a bus route between Old Sarum and Salisbury serving Ford.

The opportunity to investigate the potential for development adjacent to Ford, within the comprehensive approach sought by Core Policy 9, must originally have been considered sound by the Council.

- Conservation of a green open space

While this is true, Blanefield considers the pertinent issues are the extent of the impact of its loss to the open character of the landscape/airfield and the fact that there is no public access to this green open space at present. Again these are among the material considerations to be taken into account in developing master and management plans with the Council under Core Policy 9.

13. The essential theme is that Core Policy 9 seeks to provide a comprehensive approach to guide and give certainty to the future management, use and development of the airfield to secure and enhance the heritage and character of the site, local amenity and sustainable development. Careful consideration will be given (as work to date has and will continue to do) to matters, not least impact on the conservation area/listed buildings, in developing sensitive proposals for the airfield including the potential areas for development. Blanefield's desire is that Core Policy 9 will deliver an outcome to the mutual satisfaction of interested parties.

Conclusion

14. The arguments in this Statement show that deletion of the potential area for development adjacent to Ford is unsound:
 - absence of singular planning justification compared to other two areas;
 - not supported by the evidence base and local circumstances;
 - potential to undermine the comprehensive planning approach/framework for the airfield offered by Core Policy 9and should be reinstated on Map 5.

Change 2 - Paragraph 6.41(ii), last sentence

15. The submitted change (SWCS 13B) adds 'northern' before 'airfield perimeter' reflecting the deletion of the south potential area for development, adjacent to Ford. This is unsound for the reasons given above.

16. Blanefield notes this submitted change is not at all the same as the text change in the resolution of Wiltshire Council in November 2009 (COM/1/426) and formally consulted on between 28th January and 1st March 2010 (SWCS 14B). This states:

"In accordance with RSS paragraph 7.2.14, this strategy will allow sympathetic development within the airfield perimeter as indicated within Map 5."

17. Blanefield has no issue with this consultation wording subject to amendment of Map 5 to reinstate the potential area for development adjacent to Ford.

Issue 11.2 Aircraft Noise. What potential would the development of these sites have to secure some control over the noise of aircraft using the airfield?

18. This is dealt with in the Statement of Common Ground.