

## **SOUTH WILTSHIRE CORE STRATEGY**

### **THE DISTRIBUTION OF DEVELOPMENT**

#### **1.0 Additional Comments**

- 1.1 This submission is supplementary to the previous comments upon the Core Strategy (See BJC1 etc). This Statement concerns the distribution of development which is regarded as "unsound" for the reasons set out in this statement.
- 1.2 The principal concern relates to the emphasis on relatively few sites for major development which are regarded as more sustainable while the extensive rural area is unnecessarily constrained.
- 1.3 Some statements appear to be misleading, for example, there is reference in the Core Strategy to a flexible and contingency based approach to development particularly with reference to the 'secondary villages' but the assessment of 'greenfield' sites in the SHLAA paints a restrictive and inflexible approach.
- 1.4 The terminology is also unhelpful. The reference to 'proportionate' (para. 5.3) cannot be regarded as a 'sound' approach to sustainability. Surely, there should be reference to the benefits or disbenefits of additional development to support services, shops and schools etc., where appropriate, and the need to ensure that the housing requirements are met.
- 1.5 I made reference in my earlier submissions to the comments of the Inspector who examined the Test Valley Core Strategy at a Pre-Hearing Meeting (BJC1). In that case, the Inspector considered that TVCS was restricted to 'land use planning' and did not "adequately address place-shaping or provide any information on delivery as expected by PPS12.
- 1.6 With regard to the delivery strategy, the Inspector emphasised that:

I appreciate that this is a rural Borough, in which safeguarding the countryside and its assets, guarding against intrusive encroachment, is a major consideration/ a key issue. However, meeting the strategic housing requirement from the SE Plan, should also be regarded as a key issue.

- 1.7 The Inspector was concerned that the Test Valley Core Strategy did not have a contingency in the event that the proposed major development areas do not perform. It seems to me that the same weaknesses apply to this Core Strategy.

### The Hierarchy

- 1.8 Paragraph 5.3 sets out the hierarchy and this refers to D. Secondary Villages. It states in respect of Alderbury, Broad Chalke, Coombe Bissett, Dinton, Fovant, Great Wishford, Hindon, Ludwell, Morgan's Vale/Woodfalls, Pitton, Porton, Shrewton, Tilshead, Whiteparish. The Winterbournes and The Winterslows, that:-

**Levels of growth *proportionate* to their size, character and environment will be supported in these settlements.**

- 1.9 This is an exceptionally vague statement which provides no guidance to land owners or the local residents. Surely, the statement should provide more guidance as to how the term 'proportionate' should be interpreted. It is not clear how development can be proposed on the basis that "levels of growth proportionate to their size, character and environment. This is not a satisfactory basis for the assessment of development which, surely, should be based upon an assessment of sustainability in terms of existing land use ie land that makes little contribution to the landscape and has limited beneficial use.
- 1.10 Reference should also be made to 'sustainability' and the assessment of sustainability should be wider to include the assessment of the settlement in terms of its needs. A balanced community is not achieved by the use of the "exceptions" policy. There is a need for both affordable housing and private housing in the villages to support services and the community itself.

- 1.11 Paragraph 5.17 refers to the Wilshire Community Area where Alderbury, Coombe Bissett, Morgan's Vale/Woodfalls, Pitton, Whiteparish and The Winterslows are the relevant settlements. With reference to these settlements, it states:-

**These villages provide a reasonable level of local services and facilities where modest growth will be appropriate.**

- 1.12 There is a mysterious deterministic approach to development which assumes that 'modest' growth is the solution. There is the need to look at the settlement itself and the wider context. More development in a throughout the area covered by the Core Strategy will change the character and it may mean that some areas become more sustainable because of their proximity to strategic developments and collectively to development in adjoining settlements. This could result in improved public transport.

### The Rural Areas

- 1.13 In Paragraph 5.46, with reference to the rural areas, it states that

**A finer grain analysis through a Site Specific Allocations DPD will be carried out to identify how the growth can best be accommodated.**

- 1.14 I believe that the "*fine grain analysis*" is too vague and provides little guidance as to how new development should be assessed. The emphasis should be placed upon the assessment of sustainability in the wider context that I have outlined above ie the needs of the community and the desirability of a more flexible approach. There is no certainty that the emphasis of development in larger settlements will prevail in future. Electric cars, the generation of power in the rural areas could altered the balance in the next few years.

### SHLAA

- 1.15 Comments upon the individual sites as submitted in the SHLAA do not support the approach in the Core Strategy which states in the case of Whiteparish that

**Any development will have to be commensurate with Whiteparish's position within the settlement strategy as a 'main village' where only limited future development would take place. (see for example Site ref:- 276).**

- 1.16 "Limited future development" identifies a restrictive approach which indicates the thinking of the Council and it clearly does not attempt to assess the needs of the community. A similar statement is made in respect of other Category D settlements. It is evident that the seemingly flexible approach adopted in the Core Strategy is not reflected in the approach to the rural areas which is clearly very restrictive.

## **2.0 The Case for more development in the rural area.**

- 2.1 There are a number of important considerations that support a more flexible approach to development in the rural areas (especially Category D settlements). This approach is even more important as we enter a period of constraints as we emerge from the recession. Development in the rural areas will provide jobs and support existing services.

- 2.2 Whiteparish, for example, has a community hall, church, a primary school, a play group and pub and a shop. New development could provide benefits to all of these uses. New development would include a proportion of affordable housing which is much more desirable way of making such provision than isolated 'exception' sites.

- 2.3 I recently submitted my comments upon the East Hampshire Core Strategy. It makes the following statement:-

**2.8 We already have a lack of affordable homes in the area. The Council carried out Strategic Housing Market Assessments in 2006 and 2008 which reveal that 670 additional affordable homes need to be built each year to meet housing needs and address the backlog over five years. To put this into perspective, it means that even if all the homes required for the district by the South East Plan were built as affordable homes, it still would not be enough to meet the need.**

- 2.4 I haven't found a similar statement in this Core Strategy but it is undoubtedly applicable. How should the residents react to this paragraph. Do they question the assessment or do they conclude that the housing figures in the plan are inadequate? The figures are used to justify revised proportions of affordable provision within developments, 40% on all new schemes, and lower thresholds. It is immediately evident that this can only start from 2010 and it admits a shortfall of at least 60%!
- 2.5 PPG7 may have been replaced but it recognised the importance of maintaining 'healthy rural communities' and the need to sustain local services. Paragraph 2.10 states:
- Development plans should help promote healthy rural communities where people can both live and work. The main focus of new development should be on existing towns and villages (including networks of small villages) and other areas allocated in development plans, where employment, housing (including affordable housing) and other facilities can be provided strengthening villages and market towns, protecting the open countryside, sustaining local services and moving towards a better balance between employment and housing in rural communities, thereby reducing the need to travel.**
- 2.6 This provides a better basis than using such words as 'proportionate' and 'fine grain analysis'.
- 2.7 The development of the strategic sites will also have an impact upon travel patterns and this could provide better public transport to rural areas. This is especially the case along the routes that serve a line of settlements such as the A36, A338 and the A27. The A338 serves a number of settlements besides the strategic sites which could benefit from improved bus and other services which could improve their sustainability credentials.
- 2.8 Whiteparish, for example, is identified as having a range of services and facilities. It lies on the A27 and close to the A36. It is more or less equidistant between Salisbury and Romsey and even Southampton

- 2.9 The sustainability assessment is also 'unsound' because it takes no account of the existing land use, for example, is the land of any agricultural value or is it so isolated from other land and close to existing properties that the best solution be to bring it into use for development. The farm buildings at Woodfalls Farm have been derelict for many years (Site Reference 085:SHLAA). They should be cleared and put to another use. The alternative of employment use is entirely inappropriate (see SHLAA ). I specifically request that the Inspector visits this site to see the problem and the desirability of a more flexible approach.
- 2.10 There is little consideration of the desirability of people to live close to the countryside which is especially attractive for families. It is also known that the demography of the rural areas is that of an ageing population. The failure to provide more development will result in declining services and isolation of the old.
- 2.11 There is no evidence that the Council has examined *school rolls* to assess capacity and the desirability of utilising capacity or the consequences of declining rolls. I recently attended a school where the head mistress advised that the school was bound to close if the number of children continued to decline.
- 3.0 Conclusion**
- 3.1 The Core Strategy is 'unsound' with regard to the distribution of development for the reasons set out above. The benefits and disbenefits of more development in the rural areas especially Category D Settlements has not been addressed and the guidance on future development is unnecessarily restrictive.
- 3.2 The Sustainability Assessment disregards the needs of local communities and benefit of optimising the use of existing facilities especially schools or the benefit to the community in providing a balanced population.
- 3.3 Finally, I do not believe that the proposed distribution has sufficient flexibility to provide for contingencies.