



**South Wiltshire Core Strategy
Development Plan Document**

**Expanded Written Representations
On Behalf of D Fretwell & Others
Policy CP1; South Wiltshire Community Area - Downton**

**Core Policy 1, Matter 2:
The Distribution of Development -
Settlement Hierarchy**

**Representations in Response to Identified List of Main Matters
and Issues**

Representor Reference 2873

1.0 Introduction

- 1.1 These Expanded Written Representations (EWR's) are submitted on behalf of D Fretwell and others pursuant to our original written representations dated 28 September 2009.
- 1.2 The South Wiltshire Core Strategy (SWCS) Draft Programme identifies the subject of our original representations within 'Matter 2' and deals with 'The Distribution of Development - Settlement Hierarchy'. The List of Main Matters and Issues (Revised) includes Question 2.4, dealing with the 'Proposed Levels of Growth in Settlements';

"Broadly speaking, have the right levels of growth been allocated to various settlements?"

- 1.3 These EWR's respond to this question in the context of the settlement of Downton.

2.0 Summary of Original Written Representations

- 2.1 Our original representations sought the following changes:
 - Amend policy CP1 to reduce the planned growth at Salisbury from 7,480 homes to 6,000.
 - Make consequential increases to the amount of dwellings in the five community areas, principally at the Category B settlements, including Downton.
 - Amend policy CP1 to increase the amount of housing at local service centres and, as a consequence, reduce the amount of housing in the rest of the relevant community area.
 - As a consequence of these representations, amend the strategic allocations and / or the dwelling numbers in CP 2.

3.0 Expanded Written Representations

- 3.1 'Matter 1' considers the weight to be given to the emerging Regional Spatial Strategy (RSS). For the purposes of these EWR's we assume that considerable weight will be afforded to the policies of the emerging RSS. This assumption is based on the Government Office for the South West (GOSW) response to the South Wiltshire Core Strategy proposed Submission Document, dated 29 September 2009. Within the third paragraph it is stated that:

"Considerable weight can be attached to the contents of the Secretary of State's Proposed Changes to the RSS given the late stage it has now reached in its preparation."

- 3.2 The EWR's therefore refer to the RSS and its preparation, in the context of the distribution of development and the settlement hierarchy.

3.3 Draft Regional Spatial Strategy for the South West

3.4 The SWCS, at Page 40, clearly identifies Downton as an important local centre that provides a good level of services to the surrounding area; equivalent to Settlement Policy B of the RSS. That assessment is not disputed.

3.5 Development Policy B sets out criteria for identifying appropriate settlements and then states:

"... provision will be made for housing, employment and other services that increase their self-containment and enhance their roles as service centres."

(Our Underlining)

3.6 The policy is therefore one of growth; in terms of housing, employment and other services. The background to this is set out in the Panel Report of the Examination in Public (EIP) to the draft RSS. Paragraph 3.29 of the report clearly identified two particular matters for the policy to address:

"The first is to express an invitation to Local Planning Authorities to identify the settlements suitable for 'locally significant' development in their LDFs using appropriate spatial criteria. The second is to then indicate the broad scale and type of development that would be acceptable (or unacceptable) within them (this sequence being requisite for a Plan-led process)."

3.7 SWCS Response to RSS

3.8 It is submitted that the SWCS does not respond to the opportunity for growth anticipated, and required, by RSS Development Policy B. In particular, housing growth at Downton is limited to one saved local plan allocation at Wick Lane; now under construction. Paragraph 9.11 of the SWCS states that:

"... the Wick Lane site will deliver a small number of dwellings ..."

3.9 The subsequent assertion that this will make a strategic contribution to the needs of the Southern Wiltshire Community Area is not founded on evidence. Based on the SWCS assessment of housing need of 740 new homes, the Wick Lane site contributes less than 7%. Whilst the LDF process will, at a future date, consider further allocations, it is submitted that the dwelling numbers set out in the SWCS are insufficient to achieve the level of growth expected of a 'Category B' settlement.

3.10 The approach to distributing development is described in SWCS Topic Paper 3 Addendum 2; *"Sustainable development Strategy"*. However, this fails to acknowledge the opportunity to provide the locally significant development required at an RSS Development Policy B settlement. Instead, the approach taken in the SWCS is to distribute housing growth in direct proportion to the number of basic facilities in each settlement, including the Salisbury SSCT. This means that the SSCT will grow substantially because the number of basic facilities is significantly higher than anywhere else in the South Wiltshire area.

3.11 The consequence of this approach is to increase the level of development at the SSCT to a figure well in excess of that set out in RSS Policy HMA11; at the

expense of the Policy B settlements, such as Downton. These were anticipated in the RSS to take additional housing growth in order to support and expand other services.

- 3.12 The alternative approach, advocated in these EWR's, is to revert to a distribution of development more in keeping with that set out in the Proposed Changes to the RSS. This is supported by the comments dealing with housing provision in the Salisbury Housing Market Area (HMA) set out in the EIP Panel Report. At Paragraph 4.11.18 it is stated that:

"Planned development at other Policy B and C settlements, some of which may include surplus military land, may also be expected to make a contribution balanced housing and employment growth at carefully selected Policy B and C settlements would enable appropriate settlements to grow sustainably and without harm to environment."

- 3.13 The SWCS Topic Paper 3 Addendum 2 (Paragraph 1.8, 5th bullet point) mistakenly classifies Downton as a "third tier" local centre. This is contradictory to the identification of Downton as a second tier settlement in the SWCS itself; i.e. an RSS Development Policy B settlement. The potential to accommodate locally significant growth at Downton (see quotation following Paragraph 3.6 above) is understated elsewhere in the same Topic Paper. This is particularly so at Paragraph 1.13 (3rd bullet point), where Downton is stated to be able to provide only modest growth.

- 3.14 Dispersing development across the district could help to increase the number of facilities available in areas outside the SSCT. This is acknowledged in Paragraph 4.3 of Topic Paper 3, although it is then stated that there is no strong evidence to support this. However, the evidence is not produced. Instead, this important paragraph goes on to state that:

"Therefore, the sustainable dispersal of development should be based on the existing situation, rather than predictions of a resultant increase in facilities."

- 3.15 Thereafter, Paragraph 4.4 of Topic Paper 3 seeks to endorse the approach of the SWCS by referring to support within Paragraph 3.5.3 of the Proposed Changes to the RSS. However, this is in error; this paragraph of the RSS provides the pre-amble to Development Policy C - small towns and villages. Development Policy B settlements require different treatment; i.e. locally significant growth.

- 3.16 RSS Development Policy B settlements, including Downton, should therefore accommodate a greater amount of development; not only to support local services, but to allow them to expand. This will increase the self containment that is encouraged by the RSS.

3.17 Specific Characteristics of Downton

- 3.18 Although Topic Paper 3 contains a list of services and facilities in each of the settlements, there is no critical analysis of how they contribute to the existing, and future, function of the settlement. In respect of Downton, the following opportunities exist:

- Trafalgar Secondary School - by reference to the list of basic facilities as set out in the addenda to Topic Paper 3, Downton is one of only two settlements outside of the SSCT to have a secondary school; Amesbury being the other. Locating new development within the catchment area of existing, established educational facilities, has advantages over the need to construct completely new schools that may be required with large scale urban extensions.
 - Public transport - Topic Paper 3 refers to one means of journey to work. In fact, the regular bus service is the Wilts. & Dorset X3, which operates mostly on a half hour basis from Salisbury via Downton, Fordingbridge and Ringwood, to Bournemouth (and vica versa). Historically, this has been supplemented by the 'PulseLine' bus service that runs through Downton, Woodfalls and Redlynch, from Salisbury. Due to a rise in operating costs the commercial operator, Wilts. & Dorset, is now unable to operate the service. As a result, from the 21st March 2010 Wiltshire Council are funding a new service (No. 44), running approximately every 90 minutes. It is submitted that a greater quantity of new development will potentially increase patronage and support transport services without recourse to public subsidy.
 - Employment - Downton is benefitting from the development of the Downton Business Park. This is situated on the east side of the A338, at the northern end of the settlement. Allocated for development in the Adopted 2003 Replacement Salisbury District Local Plan, it comprises an extension to an earlier industrial estate. Some small areas of the site have yet to be developed. However, based on the 2007 Salisbury District Employment Land Review, the Downton Business Park is 5.5 ha in size and accommodates 69 businesses. It is one of eight strategic employment sites identified within the whole of the SWCS area. Further residential development at Downton will be complementary to the completion of the business park, which offers a substantial number of local job opportunities; enhancing self-containment and reducing out commuting.
 - Community facilities - Downton benefits from a substantial range of community facilities that would be enhanced by additional housing development in the settlement. These include a library, Downton Leisure Centre, Longclose Park Sports Ground, 4 churches and 4 public houses.
- 3.19 In addition to these facilities, Downton contains a range of shops that would also benefit from the increased expenditure of an expanded population in the settlement. New services could be encouraged to be established. This approach is more pro-active to that set out in the SWCS which, for Downton, seeks to retain a status quo. Instead, further growth will enhance the settlement as a service centre, in line with RSS Development Policy B.
- 3.20 For these reasons, our representations on behalf of D. Fretwell and others are commended to the inquiry inspector.