

South Wiltshire Core Strategy DPD

Amplified Written Representation on behalf of Mr G. Smith

BACKGROUND & SUMMARY

1. This Amplified Written Representation is made by Savills on behalf of Mr George Smith in respect of several sites at Shrewton under his ownership that have been included within the *Strategic Housing Land Availability Assessment* ('SHLAA').
2. During the 'pre-submission' consultation on the South Wiltshire Core Strategy (SWCS) in September 2009, representations were made on behalf of Mr Smith in respect of several policies¹. In addition Savills has previously submitted to the local authority the case for further housing and employment development at Shrewton, and appraisals of our client's land holdings identifying their merits in planning terms and the case for their being allocated in due course within a site allocation DPD.
3. In summary, for the most part we support the SWCS and consider it sound and legally compliant.
4. However, we have objections to a specific element of *Core Policy 1* where, in respect of the Amesbury Community Area, Tilshead is identified as appropriate for modest growth including market-led proposals. In our view, as a result, the overall distribution strategy does not represent a sustainable, justified or effective distribution of growth. Therefore, the specific change to *Core Policy 1* that we consider necessary in order for the DPD as a whole to be sound is:
 - the deletion of Tilshead from the 'secondary villages' group;
 - assigning it instead to the 'small village' group;
 - redistributing proposed levels of development for the area across the other 'secondary villages', such as Shrewton, accordingly.
5. In making the case for this change, this representation draws primarily upon elements of the SWCS 'evidence base' and other material considerations that initially led Salisbury District Council to a similar conclusion within earlier drafts of the SWCS.
6. For the avoidance of doubt the SWCS proposes Shrewton itself to be within *Group D: Secondary Villages*. Other proposed 'Group D' settlements in this area are Porton, Tilshead, and 'the Winterbournes' collectively.

Q.2.2: 'Have the right settlements been allocated to the right levels in the hierarchy?'

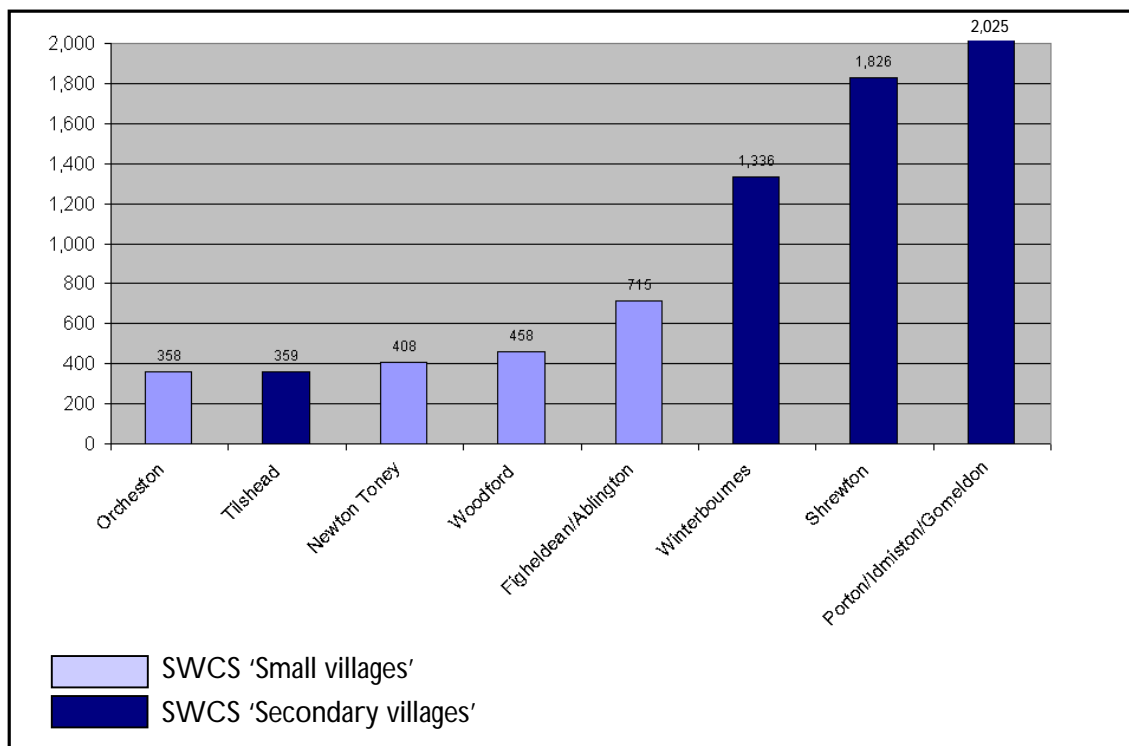
7. Our representations concerning this question are under three headings: (i) population of settlements; (ii) the significance of 'basic facilities'; and (iii) the deliverability of growth within the Core Strategy.

¹ Strategic Objective 1 (the role of settlements); Strategic Objective 2 (total housing provision for South Wiltshire); Strategic Objective 3 (the economy and job opportunities); Strategic Objective 4 (community objectives); Strategic Objective 6 (retail in South Wiltshire); Core Policy 1 (settlement strategy and distribution of growth); Core Policy 11 (housing within the Amesbury Community Area).

(i) Population of settlements

8. Salisbury District Council's preliminary approach to settlements was outlined in *Topic Paper 3 - Settlement Strategy (July 2007)* – the original topic paper – where Tilshead was included within a lower 'tier' than Shrewton, Porton, and the Winterslows. This assessment, which the Inspector will be familiar with, was based upon a detailed analysis of both population and facilities, and concluded that Shrewton, Porton, and the Winterslows had the greatest merit for future development allocations. In contrast Addendum 2 to *Topic Paper 3 (July 2009)* reached somewhat different conclusions, reducing the degree to which existing population informs classification within the SWCS (paragraph 2.8), and instead adopting four 'basic facilities' as the major factor distinguishing between 'Group D' and 'Group E' settlements (paragraph 2.11).
9. *Topic Paper 3* identified² that Tilshead was a very small community in population terms compared with others now under SWCS 'Group D'. Shrewton itself exceeds 1,800. Whilst we would agree that the SWCS should not take a purely deterministic approach based on existing population to classify a settlement's future role, in our view the revised hierarchy is wrong in having effectively *no regard to population* as a 'gauge' of the roles and functions of settlements.
10. Figure 1 indicates the populations of settlements within the Amesbury Community Area between 'small villages' (i.e., those proposed to be limited to 'infill and exceptional development'), and 'secondary villages', which implicitly are acceptable for more substantial and potentially market-led development through the plan period.

FIGURE 1: POPULATION OF VILLAGES' IN AMESBURY COMMUNITY AREA (2001 CENSUS)³



² At figure 2, page 9.

³ Source: http://www.wiltshire.gov.uk/community/census_search.php Porton is included with Idmiston for Census purposes, although only Porton itself is identified as a 'secondary village' by the SWCS.

11. Evidently, within the Amesbury Community Area there is a major divide between the larger and smaller villages in terms of population, with Orcheston, Figheldean/Ablington, Tilshead, Newton Toney, and Woodford similar in size to one another. Three of the 'secondary villages' in contrast are far larger – several times larger in some cases. The obvious anomaly is Tilshead, which is only around one-quarter of the size of the next-largest 'secondary village' which is the Winterbournes.
12. Whereas this distinction was reflected within earlier drafts of the settlement strategy, we would contend that the later inclusion of Tilshead within the higher grouping overlooks substantial differences in the role and function of this, where population is a major indicator of that difference.

(ii) 'Basic facilities'

13. Conversely, in our view the proposed settlement hierarchy accords *too much* weight to the presence or absence of a small number of 'basic facilities', and adopts a largely deterministic approach based on level of facilities. As the 2nd addendum to Topic Paper 3 notes, the sole criterion now determining whether a settlement is within the 'small village' or 'secondary village' category, is whether it has 'three or four Basic Facilities' (paragraph 3.35), which are:
 - A primary school;
 - A 'general food shop serving a range of daily needs';
 - A Post Office;
 - A 'Journey to work' public transport service.
14. In our view, although the existence of such services as these is a necessary precondition of a settlement being 'sustainable', and thus appropriate to be identified by the SWCS for potential further market-led housing development, it should not be the sole determinant. In our view, a clear distinction can be made between the modest role Tilshead, which plays 'host' to certain facilities to a large extent due to its sheer isolation within Salisbury Plain, and the more substantial wider role played by the larger villages. In addition to the 'basic facilities', these benefit from a far greater range of facilities (including GP surgeries at Shrewton⁴), the need for which is generated in part by a greater population.
15. Contrary to the implicit conclusion of *Topic Paper 3 Addendum 2*, the existence of 'basic facilities' such as a primary school or shop does not necessarily indicate that a village is more 'sustainable': factors such as catchment and surrounding patterns of development are also significant. Tilshead, by the standards of South Wiltshire and indeed much of the region, is a very isolated settlement and this is likely to lend support the continuation of certain facilities due to a lack of alternative convenient provision.
16. Equally, the presence of a 'journey to work' public transport service does not necessarily suggest that a settlement is more sustainable. Tilshead's merits in this respect derive in large measure from its location on the A360, along which there are frequent buses between Salisbury and Devizes that stop in the village. By comparison, the larger 'secondary villages' in the district such as Shrewton are far more likely to generate a need in their own right for bus services.
17. Bearing these factors in mind, we do not consider that the pure 'count' of basic facilities is an adequate basis to determine the role of settlements within the SWCS.

⁴ Whereas the 2005 Rural Facilities Survey indicates the presence of a GP surgery at Tilshead, we believe that this is an error since none is identified by the NHS database/GIS online at <http://www.nhs.uk/>

Deliverability

18. Government policy as expressed in *PPS12 – Local Spatial Planning* is clear that in order to be effective, a Core Strategy must be 'deliverable' (paragraph 4.44). In our view, in addition to lacking the characteristics of sustainability discussed above, Tilshead is in any event unlikely to fulfil the role that 'secondary village' status within the SWCS would bestow on it, due to a lack of developer interest and a lack of acceptable sites.
19. The *SHLAA* process for South Wiltshire was initiated by Salisbury District Council during 2007, with advertisements being placed in the local press and a 'call for sites' issued to a range of parties. At that stage an abundance of sites (200+) across the district were identified for consideration. Landowners, agents, and third parties have also been at liberty during the subsequent 2-3 years to make further submissions of sites into the process.
20. At Tilshead only one site⁵ was submitted, which has subsequently been identified by planning officers as 'unsuitable'. Its development potential, in any event, was limited being . In contrast, six 'suitable' sites have been identified in Shrewton (in addition to nine further sites); four in Porton; and four within the Winterslows, suggesting a considerably greater level of potential and market interest in these villages.
21. We recognise that it is for later DPDs and not the SWCS itself to assess in detail the suitability of village-scale development sites. However, the relative lack of interest shown to date in bringing forward candidates within Tilshead, coupled with planning officers' preliminary assessments of the suitability of the one which was submitted, would suggest that **only the larger settlements** such as Shrewton could make a contribution towards the Core Strategy objectives of delivering modest growth across this community area. The merits of our client's land in accommodating part of the growth planned for this community area are, we believe, strong, as our earlier representations have made clear – and as has been noted within the preliminary *SHLAA* review in respect of some of these sites⁶.
22. This conclusion, we believe, corroborates the points made above that Tilshead is an inherently different 'type' of settlement that is more appropriately categorised within the 'small villages' category.

CONCLUSION

23. We believe that further market-led development at Tilshead is not deliverable, and that in any event it would be inconsistent with national and regional imperatives relating to sustainability. Its inclusion, therefore, within the 'secondary village' category dilutes the objective of the SWCS to deliver new development sustainably across the plan area, and obscures the greater merit in accommodating market-led growth within the larger settlements such as Shrewton. Correspondingly, only by distributing growth across a *smaller* number of more sustainable settlements in greater quantities, do we believe that the potential benefits of development in terms of planning gain and supporting community objectives can be realised.
24. We therefore respectfully request that the inspector considers making the suggested change to the settlement hierarchy within the Amesbury Community Area, i.e., of removing Tilshead from the 'secondary villages' group and redistributing future growth across the other larger settlements including Shrewton.

⁵ Site reference 78 (Land at Glebe Farm)

⁶ Site re: 150 (Land North of A360, Shrewton), and 151 (Land South of Nettley Farm, Shrewton)