

South Wiltshire Core Strategy DPD

Amplified Written Representation on behalf of Persimmon Homes Ltd.

BACKGROUND & SUMMARY

1. This Amplified Written Representation is made by Savills on behalf of Persimmon Homes (South Coast) Ltd. in respect of a site at Salisbury Road, Downton, which is included within the *South Wiltshire Strategic Housing Land Availability Assessment* ('SHLAA') under reference number 200.
2. During the 'pre-submission' consultation on the South Wiltshire Core Strategy (SWCS) in September 2009, representations were made on behalf of Persimmon Homes in respect of several policies¹. Savills has previously submitted appraisals of the site's potential at earlier stages of SWCS and SHLAA preparation, identifying its inherent merits in planning terms for significant housing development, and the case for its eventual allocation within a site allocation DPD.
3. In summary, for the most part we **support** the SWCS and consider it **sound and legally compliant**. However, our client has objections to the element of *Core Policy 1* in the section concerning the Southern Wiltshire Community Area, where it identifies 190 dwellings as the total 'planned growth' for Downton, out of a total of 740 dwellings for the Southern Wiltshire Community Area.
4. In our view, as a result, the distribution strategy for this community area is not sustainable, justified or effective. Therefore, the specific change to *Core Policy 1* that we consider necessary in order for the DPD as a whole to be sound is:

an increase in the planned growth for Downton from 190 dwellings as currently proposed (or around 25% of the total for this Community Area) to around 370 dwellings, or around 50% of the total.
5. This representation therefore is in response to Question 2.4. In making the case for these changes, it draws mainly upon elements of the SWCS 'evidence base' and other material considerations.
6. For the avoidance of doubt, our representations concentrate on the distribution of proposed levels of growth *within* the Southern Wiltshire Community Area and not the total.

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 14 (housing within the Southern Wiltshire Community Area).

Q.2.4: 'Have the right levels of growth been allocated to various settlements?'

Overview

7. As the Inspector will be aware the SWCS proposes a settlement 'hierarchy' with several tiers that reflect the existing and proposed roles and functions of settlements. One of these 'tiers' is *Group C: Local Service Centres*, which the plan regards as analogous to *Development Policy B: Market and Coastal towns* within the emerging Regional Spatial Strategy (RSS) for the South West.
8. Settlements proposed to be within this group are Downton, Mere, Tisbury, and Wilton. The roles of Local Service Centres ('LSCs') in general, and of Downton in particular, are outlined as follows within the draft SWCS (emphasis added):

The Local Service Centres will be the main focus of growth within their Community Areas.'
(submission draft SWCS, p. 44, paragraph 5.8)

'Downton is a large settlement providing a good level of services and performs the role of Local Service Centre for this Community Area. It provides a good source of employment with one of eight strategically important employment sites in south Wiltshire located in Downton.'
(submission draft SWCS, p. 40, paragraph 5.3)

9. In broad terms, we support the SWCS in directing significant development towards the 'Local Service Centres'. However, we regard the rationale for allocating only 190 dwellings at Downton as weak, unjustified, and inconsistent with the general objective of delivering development sustainably by defining LSCs as the main focus for growth in their Community Areas.
10. The rationale for identifying growth of 190 dwellings at Downton is contained within *Topic Paper 3, Addendum 2 – Sustainable Settlement Strategy* (July 2009), and is explained as follows:

'The Local Service Centre (Downton) and Secondary Villages (Aldbury, Coombe Bissett, Morgans Vale/Woodfalls, Pitton, Whiteparish and The Winterslows) in this area have a combined total of 27 Basic Facilities, of which Downton has 7 (26 %). The number of new houses in Downton would therefore be likely to be around 192 (26 % of 738).'
(paragraph 7.5).

11. Whilst we would agree that a larger number of facilities in a settlement will generally correlate with its 'sustainability', applying a target for Downton purely in proportion to the number of 'basic facilities' it has is essentially arbitrary. For the avoidance of doubt, 'basic facilities' are defined in the Rural Facilities Survey as:
 - A primary school;
 - A 'general food shop serving a range of daily needs';
 - A Post Office;
 - A 'Journey to work' public transport service.

(Topic Paper 3, Addendum 2, paragraph 2.10).

12. From this it is clear that housing provision at Downton has been made using an **essentially deterministic** approach, based entirely on the proportion which happen to be located at

Downton. There are a number of self-evident weaknesses in adopting this approach which are now outlined.

Facilities and sustainability

13. Firstly, although the general pattern or distribution of 'basic facilities' across the community area is of some interest in general terms, the significance of this wider context is overstated by the draft SWCS. Downton, it is stressed in the draft plan, is the only settlement in this community area to which a specific level of growth is directed, and as such it is necessary to give adequate consideration to its own role and function, and not simply extrapolate from a general appraisal of facilities across lower-order settlements. The spatial characteristics of this community area adds weight to this view: Core Policy 1 of the SWCS notes that many of the settlements to the north have little relationship with Downton, and instead have a '*much stronger functional relationship with the City*² - i.e., Salisbury. This being the case, the existence of post offices, shops etc. across the wider area is largely irrelevant to how appropriate or 'sustainable' any given level of growth at Downton would be.
14. Secondly, the 'score' that has been applied to Downton in terms of its facilities is, in any event, an inaccurate and flawed reflection of the facilities that it is 'host' to and the role and function it plays. For instance;
 - No additional weight is given to the presence of a secondary school, compared with a primary school, with each receives one 'point'. The presence of a secondary school is self-evidently far more significant than a primary school and is indicative of a higher-order role. The Trafalgar School at Downton (a secondary school) has in excess of 520 pupils and serves a catchment area across much of the area. Downton Primary School is also large with around 200 pupils. In contrast, rural primary schools more typically serve a limited area and often have fewer than 100 pupils.
 - The current approach has no regard to the size or type of shops: again, only one 'point' is awarded per shop that meets basic everyday needs. As such, no regard is had to the higher-order function that Downton serves in retail terms, exemplified by the Co-operative store (effectively a small supermarket rather than a convenience store), a bank, and a number of other more specialised shops.
 - No regard is had to the presence of Downton Business Centre, which is categorised within the Employment Land Review³ as a 'strategic employment site', one of eight in South Wiltshire. All such sites exceed 5 hectares and 20 businesses in size, and they are '*considered to be strategically important in terms of economic development for the whole Salisbury economy, and not just the local community area in which it is located*' (paragraph 3.2.3).
 - Other higher-order facilities, such as the public library and leisure centre at Downton, are also effectively disregarded.
15. Our more general criticism is that the existence of 'basic facilities' such as a primary school or shop does not necessarily indicate that a village is more 'sustainable' or suitable for a proportionate share of the total development for the community area. It may be the case that a village shop, school or post office has 'survived' by virtue of gradually reducing demand

² Page 46.

http://www.wiltshire.gov.uk/south_wiltshire_employment_land_review_2007.pdf

in a wider area, rather than it being located there due to the inherently sustainable characteristics of that place. The school at Pitton, for instance, now contributes to need arising at Farley whose school closed recently.

16. Similarly, the presence of a 'journey to work' public transport service does not necessarily suggest a settlement is more sustainable. The quality of access to public transport may, in fact, derive from the location of a settlement rather than its inherent characteristics. For instance Coombe Bissett, deemed to have a 'journey to work' service, is on the A354 along which there are frequent buses between Salisbury and Blandford Forum that stop in the village. In contrast, larger settlements generate a need in their own right: the 'Pulseline' service, which serves the route between Downton and Salisbury is an example of this, and complements other services such as the X3 which serve the route between Salisbury and Bournemouth.

Population and sustainability

17. Whilst the presence of a small number of 'basic facilities' has been adopted as the sole factor in allocating development to Downton, the SWCS has no regard to certain other factors that we would regard as highly significant. For instance:

'we believe that population and Community and Other Facilities should not be considerations in determining how to deliver sustainable development'
(Topic Paper 3, Addendum 2, paragraph 4.2).

18. We do not agree that population is irrelevant in determining where development would be sustainable, and would point to the following:
 - Downton's population at the 2001 Census was 2,869⁴, well above the indicative threshold of 2,000 above which settlements are within the 'market town' category in the view of the (then) Countryside Agency, which the topic paper addendum itself makes reference to.
 - The SWCS describes Downton as belonging to the 'Market and Coastal Towns' category in terms of RSS *Development Policy B*. Whilst the RSS does not stipulate a population threshold for this 'tier' in the regional hierarchy, it is clear elsewhere in the RSS that settlements in the 'higher' tiers have greater population. For instance, the populations of each of the *Strategically Significant Cities/Towns* ('SSCTs') is explicitly noted to illustrate their higher-order status.
 - In other regions population has been used as an indicator of settlement function, and to inform judgements over future planned development. For instance, the South East Plan (SEP), at policies *BE4-BE5*⁵, defines 'tiers' that are analogous to 'Development Policy B' and 'Development Policy C' settlements contained within the emerging South West RSS. The SEP notes in particular⁶ that key population thresholds exist at 3,000 and 20,000 inhabitants. Although these thresholds may not necessarily translate into the South West region, the essential point is that population is a relevant consideration.
19. We would not advocate a purely deterministic approach based on population, but would

⁴ <http://www.wiltshire.gov.uk/community/getcensus.php?id=94>

⁵ *BE4: The Role and Function of Smaller Towns; and BE5: Village Management.*

⁶ at paragraphs 12.11 and 12.14

stress the need to recognise that Downton, partly by virtue of its population, has a more substantial role than is currently recognised in the SWCS. Disregarding population factors, and limiting the analysis of roles and functions to a crude count of 'basic' facilities, results in the somewhat arbitrary figure of 190 dwellings for Downton.

Downton's wider role

20. As the inspector will be aware from his visits to the area, and as is evident to some degree from maps of the area, Downton can be regarded as the core of a wider group of settlements within a 2-3k radius, including:

- Bohemia;
- Hale
- Lover;
- Morgan's Vale-Woodfalls;
- Redlynch;

21. Combined with Downton, this group exceeds 6,000 in population⁷, and to a significant degree these settlements 'look' to Downton, which is by some margin the closest centre where higher-order facilities such as those outlined above are in existence. As such, it would be justified to take into account this wider role in allocating development in the village, taking into account the point made elsewhere within the SWCS that:

'Although Local Service Centres act as important centres these settlements also have important functional relationships with neighbouring settlements, which will influence how future growth is allocated.'

(submission draft SWCS, p. 40, paragraph 5.3)

22. We would respectfully urge the inspector to take account of the broader spatial function which Downton performs in reviewing its proposed level of planned growth.

Deliverability of suitable sites

23. 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 having the characteristics of a higher-order settlement discussed above, certain alternative villages within this community area – particularly Coombe Bissett and Morgan's Vale/Redlynch – are in any event incapable of fulfilling any significant role in accommodating growth, due to a lack of suitable sites.

24. The *SHLAA* process for South Wiltshire was initiated by Salisbury District Council during 2007, with advertisements 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. At Coombe Bissett only two sites were submitted, neither of which have been identified as 'suitable'. Similarly, at Morgan's Vale/Woodfalls/Redlynch, only three sites were submitted, none of which have been considered suitable. In contrast, four 'suitable' sites have been identified in Alderbury; seven in Whiteparish; eight within the Winterslows; suggesting a considerably

⁷ Redlynch parish, encompassing Morgan's Vale-Woodfalls, has a population of 3,495: see <http://www.wiltshire.gov.uk/community/getcensus.php?id=208>. Hale's Parish Headcount at the 2001 census was 578 (see <http://neighbourhood.statistics.gov.uk>)

greater level of potential and market interest in these villages. The 2009 SHLAA update reports that 'suitable' sites in Downton could collectively yield over 200 dwellings (our client's site included).

25. Although not necessarily ruling out development, the position of Coombe Bissett within the Cranborne Chase and West Wiltshire Downs AONB, and of Morgan's Vale/Woodfalls/Redlynch adjacent to (and within) the New Forest National Park, add further difficulty in accommodating growth there in an acceptable manner even if further candidate sites were brought forward. In contrast, Downton is relatively unconstrained in landscape and nature conservation terms, being further removed from the National Park and outside of the AONB.
26. 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, we would suggest that given the lack of suitable sites elsewhere within this part of the community area, particularly at Morgan's Vale/Woodfalls but also Coombe Bissett, it will be necessary for Downton to accommodate more than its proposed complement of 190 dwellings if the SWCS objective of delivering sustainable and managed development is to be realised.

CONCLUSION

27. In summary, the narrow and deterministic approach that has been taken by the SWCS in allocating only 190 dwellings to Downton is contrary to the need for full and proper appraisal of the relevant evidence.
28. Furthermore, in accommodating only one-quarter of the growth of the community area, this level of provision contradicts the objective stated elsewhere in the SWCS that Local Service Centres should be '*the main focus of growth within their Community Areas*'. Only by distributing growth in larger numbers, across a smaller number of more sustainable settlements, do we believe that the SWCS will be 'sound', and capable of meeting other objectives including the planned and timely phasing of growth and the co-ordinated and structured delivery of planning gain.
29. We therefore respectfully request that the Inspector considers making the suggested change to Core Policy 1 in respect of the Southern Wiltshire Community Area, i.e. of increasing provision at Downton to around 370 dwellings, or around 50% of the total for the area.
30. Should the Inspector be minded not to alter this provision, we would urge greater flexibility in policy wording, so that the figure of 190 does not amount to a 'ceiling'. This is to say, that provided development proposals at Downton could be shown to meet an identifiable need, would be acceptable in planning and environmental terms, and would contribute to a sustainable pattern of growth, the SWCS should not resist them in the event that the 190 figure were exceeded.