

South Wiltshire Core Strategy DPD

Amplified Written Representation on behalf of Primetower Properties Ltd.

BACKGROUND & SUMMARY

1. This Amplified Written Representation is made by Savills on behalf of Primetower Properties Ltd. in respect of a site at Middleton Road, Winterslow, which is included within the *South Wiltshire Strategic Housing Land Availability Assessment* ('SHLAA') under reference number 105.
2. During the 'pre-submission' consultation on the South Wiltshire Core Strategy (SWCS) in September 2009, representations were made on behalf of Primetower in respect of several policies¹. In addition, Savills has previously submitted appraisals of our client's site identifying its inherent merits in planning terms for development, and the case for its eventual allocation within a site allocation DPD. We have recently begun a dialogue with Winterslow Parish Council over how the site might best contribute positively to the community.
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 Southern Wiltshire Community Area, certain 'secondary villages' are 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 Coombe Bissett and Pitton from 'secondary villages' group;
 - assigning these instead to the 'small village' group;
 - redistributing proposed levels of development for the area across the other 'secondary villages', such as Winterslow, 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 Winterslow to be within *Group D: Secondary Villages*. Other proposed 'Group D' settlements in this area are Alderbury, Coombe Bissett, Morgan's Vale/Woodfalls, Pitton, and Whiteparish.

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

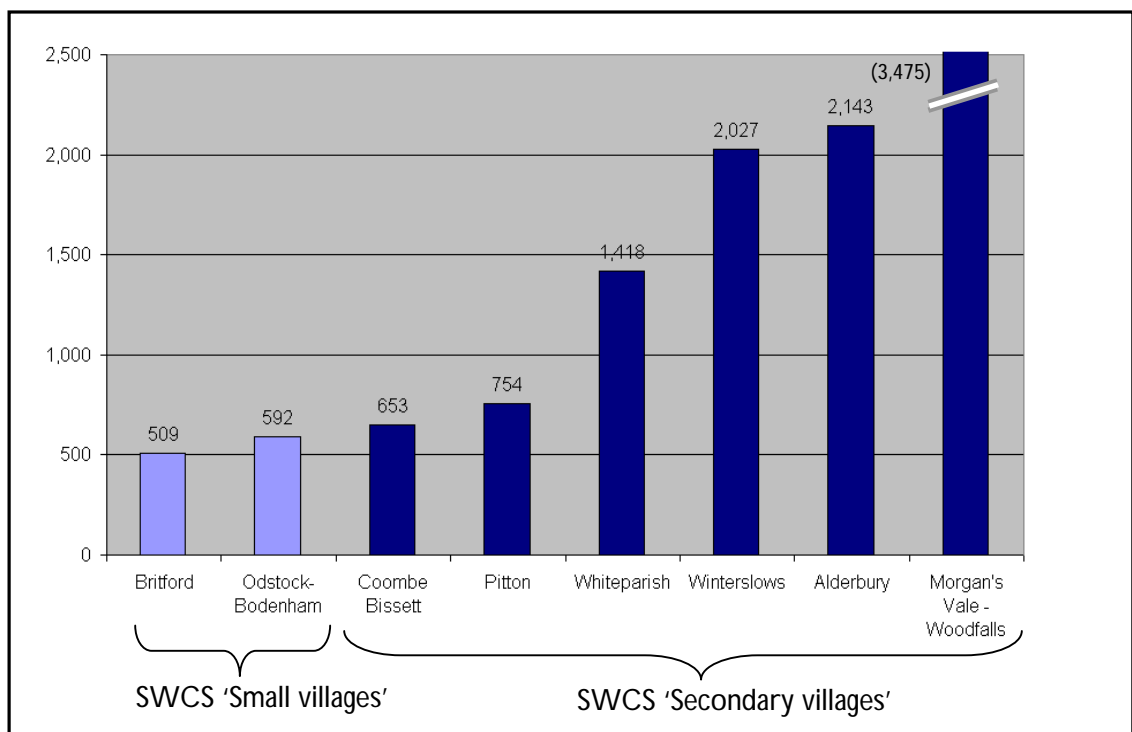
7. Our representations concerning this question are under three headings: (i) population of settlements; (ii) the significance of 'basic facilities'; and (iii) the deliverability of growth within the Core Strategy.

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 14 (housing within the Southern Wiltshire 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 both Pitton and Coombe Bissett were included within a lower 'tier' than Alderbury, Whiteparish, Morgan's Vale/Woodfalls, and the Winterslows. This assessment, which the Inspector will be familiar with, was based upon a detailed analysis of both population and of facilities within the villages and concluded that Alderbury, Whiteparish, Morgan's Vale/Woodfalls, 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 Pitton and Coombe Bissett were very small communities in population terms, whereas all other settlements in the area now within SWCS 'Group D' exceeded 1,000 in population (Winterslow itself exceeds 2,000). 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 Southern Wiltshire 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 SOUTHERN WILTSHIRE COMMUNITY AREA (2001 CENSUS)³



² At figure 2, page 9.

³ Source: http://www.wiltshire.gov.uk/community/census_search.php . N.b. Odstock and Bodenham are classified together for Census purposes.

11. Evidently, within the Southern Wiltshire Community Area there is a major divide between the larger and smaller villages in terms of population, with Pitton and Coombe Bissett similar in size to Britford, Odstock and Bodenham, and the other four 'secondary villages' in contrast being far larger – several times larger in some cases.
12. Whereas this distinction was reflected within earlier drafts of the settlement strategy, we would contend that the later inclusion of Coombe Bissett and Pitton within the higher grouping overlooks substantial differences in the role and function of these villages, 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 purely deterministic approach based on level of facilities.
14. 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). These facilities are:
 - A primary school;
 - A 'general food shop serving a range of daily needs';
 - A Post Office;
 - A 'Journey to work' public transport service.
15. 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 of villages such as Pitton and Coombe Bissett which play 'host' to certain facilities serving other isolated and disparate settlements, 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 Alderbury and Winterslow), the need for which is generated in part by their greater populations.
16. 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. The primary school at Coombe Bissett, for instance, serves a number of smaller settlements in the lower Ebbles Valley including Homington and Stratford Toney, and its post office shop performs a similar wider role. Pitton, for its part, performs an analogous role in respect of Farley, which lacks a school and shop.
17. Equally, the presence of a 'journey to work' public transport service does not necessarily suggest that a settlement is more sustainable. Coombe Bissett's merits in this respect derive in large measure from its location on the A354, along which there are frequent buses between Salisbury and Blandford Forum that stop in the village. By comparison, the larger 'secondary villages' in the district tend to generate a need in their own right for bus services, such as the #89 service which serves the route between Winterslow and Salisbury only.
18. 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.

Deliverability

19. 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, Coombe Bissett and Pitton are in any event unlikely to fulfil the role that 'secondary village' status within the SWCS would bestow on them, due to a lack of developer interest and a lack of acceptable sites.
20. 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.
21. At Pitton, four sites were submitted, of which (in our understanding) three are under the ownership of Wiltshire Council. Of these four only one⁴ has subsequently been identified by planning officers as 'suitable', and the development potential of this site (again, in planning officers' opinion⁵) is limited to approximately 29 dwellings. At Coombe Bissett only two sites were submitted, *neither* of which have been identified as 'suitable'. Although not necessarily ruling out development, the position of Coombe Bissett within the Cranborne Chase and West Wiltshire Downs AONB would add further difficulty in accommodating growth there in an acceptable manner. In contrast, four 'suitable' sites have been identified in Alderbury; seven in Whiteparish; and eight within the Winterslows, suggesting a considerably greater level of potential and market interest in these villages.
22. 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 Coombe Bissett and Pitton, coupled with planning officers' preliminary assessments of the suitability of those that have been submitted, would suggest that **only the larger settlements** could make a contribution towards the Core Strategy objectives of delivering modest growth across this community area.
23. The merits of our client's land in accommodating part of the housing growth planned for this community area are, we believe, compelling, as our earlier representations have made clear – and as has been noted by officers within the preliminary *SHLAA* review.
24. This conclusion, we believe, corroborates the points made above that Pitton and Coombe Bissett are an inherently different 'type' of settlement that is more appropriately categorised within the 'small villages' category.

CONCLUSION

25. We believe that further market-led development in Pitton and Coombe Bissett is not deliverable, and that in any event it would be inconsistent with national and regional imperatives relating to sustainability. Their 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.

⁴ Site no. 188: *Land to the north of Townsend*

⁵ SouthWiltshire *SHLAA* report, May 2009 (ref. SH/*SHLAA*/REV A)

26. 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.
27. We therefore respectfully request that the inspector considers making the suggested change to the settlement hierarchy within the Southern Wiltshire Community Area, i.e. of removing Coombe Bissett and Pitton from the 'secondary villages' group and redistributing future growth across the other larger settlements including Winterslow.