

**WILTSHIRE COUNCIL
LOCAL DEVELOPMENT FRAMEWORK
SOUTH WILTSHIRE CORE STRATEGY
EXAMINATION IN PUBLIC**

**MATTER 2: CORE POLICY 1
THE DISTRIBUTION OF DEVELOPMENT
SETTLEMENT HIERARCHY**

**ON BEHALF OF
THE LONGFORD ESTATE**

Pegasus Planning Group
Querns Business Centre
Whitworth Road
Cirencester
Gloucestershire
GL7 1RT

Telephone: (01285) 641717 Facsimile: (01285) 642348

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Q2.1 Why a Six Tier Settlement Hierarchy?

The distribution of development in Policy CS1 is based on a six tier settlement hierarchy. What is the basis for this settlement hierarchy?

- 2.1.1 The Longford Estate generally supports the South Wiltshire Core Strategy and notes its overall soundness. However, further minor changes to the Core Strategy are sought to improve its effectiveness, consistency with national policy and for clarification/updating purposes.
- 2.1.2 The strategy is consistent with the emerging RSS 10, which builds upon the previous urban focus of RPG10 and the adopted Wiltshire and Swindon Structure Plan 2016. The emphasis in RSS 10 is upon increasing the overall level of provision in Salisbury as a Strategically Significant City and Town (SSCT).
- 2.1.3 The basis for the distribution of development in Policy CS1 appears to be based on the existing six Community Areas which were devised to reflect “natural” communities reflecting patterns of employment, schools and shopping. These have been used by the Council since 1998.
- 2.1.4 Strategic Objective 1 recognises that there is a fairly clear functional relationship between settlements ranging from the dominance of Salisbury as an SSCT to local centres.
- 2.1.5 The strategy is based on a hierarchy of settlements according to their size and function and that growth will be primarily focused on settlements in the first three tiers of the settlement hierarchy i.e. Salisbury, Amesbury and the Garrison villages and Local Service Centres. This would accord with Development Policies A and B of the emerging RSS 10.
- 2.1.6 Salisbury is an SSCT, however, in terms of population Amesbury, along with Durrington and Bulford and the associated military garrisons have almost half that of the population of Salisbury and therefore collectively they have a significant role in the settlement hierarchy. Although the three settlements of Amesbury, Durrington and Bulford are distinct from one another, they do not form part of the SSCT of Salisbury or constitute an SSCT in their own right, neither do they fit the roles of a Development Policy B or Development Policy C type settlement in the emerging RSS. They have a unique position in the south Wiltshire settlement hierarchy.

- 2.1.7 The six tier settlement hierarchy as set out on pages 40 – 41 of the Core Strategy Submission Document is supported in principle although The Longford Estate has some specific comments in respect of the settlements included in the categories. These concerns are covered in response to the questions below and in the detailed representations submitted on the Proposed Submission Document.
- 2.1.8 The explanatory text for Core Policy 1 should set out more clearly how the provision in the RSS is to be met i.e. at least 6,000 new dwellings at the SSCT and at least 6,400 dwellings elsewhere.

Conclusions

- 2.1.9 The Longford Estate supports the settlement hierarchy, but considers that the split of housing numbers between the Salisbury SSCT and the rural areas in the remaining Salisbury HMA should be more clearly set out in a tabular form so that the effectiveness of the policy can be monitored in future. The following table is suggested:

2.1.10 Table 1 Housing Requirements and Provision

Requirement side

RSS Proposed Changes	Number of Dwellings
Salisbury SSCT	At least 6,000 dwellings
Rest of Salisbury District	At least 6,400 dwellings
Salisbury Housing Market Area	At least 12,400 dwellings

Supply side

Proposed South Wiltshire Core Strategy Housing and Employment provision

Area	Number of dwellings	Hectares of employment land
Salisbury Community Area	7,480	36 ha
Wilton Community Area	1,570	3 ha.
Amesbury Community Area	2,650	17 ha.
Southern Wiltshire Community Area	740	-
Mere Community Area	290	3 ha.
Tisbury Community Area	440	1.4 ha
Core Strategy Total Provision	13,170	60.4 ha
Salisbury SSCT	7,480	
Rest of District	5,690	

2.1.11 The above table shows the figures contained within the submitted Core Strategy which we do not necessarily accept. They are used simply to demonstrate how a distribution table might look in the adopted Core Strategy.

Q2.2 The Choice of Settlements

Have the right settlements been allocated to the right levels in the settlement hierarchy?

- 2.2.1 The Longford Estate considers that in general the “right” settlements have been allocated the “right” levels of growth in the settlement hierarchy. The choice of settlements needs to be consistent with the settlement hierarchy. However, the Core Strategy makes reference to the need for a finer grain analysis of settlements in order to identify further capacity to absorb growth and that this will be undertaken as part of the preparation of the Site Specific Allocations Development Plan Document to identify non-strategic sites for development.
- 2.2.2 The Longford Estate has supported the approach and categorisation of the settlements but it has objected to the more detailed analysis in terms of defining the capacity of settlements to accommodate future development purely on the basis of the number of basic facilities. (This point is covered in some detail in representations made on behalf of The Longford Estate in response to the submission Draft in September 2009). This approach stems from the Rural Facilities Survey 2005 which is now 5 years out of date, particularly given the closure of Post Offices and the increasing uncertainty over the viability of general food shops in the villages. (Bodenham is a case in point, it now has no Post Office and yet it is identified as a Small Village).
- 2.2.3 The Adopted Structure Plan has taken a more relaxed approach to development – as stated in paragraph 4.21 of the Wiltshire and Swindon Structure Plan¹. In particular it is noted that the absence of some facilities should not preclude development in an otherwise well provided village. Paragraph 3.7 of the Structure Plan outlines the approach to the scale and nature of development in each settlement.
- 2.2.4 The Longford Estate has objected to the approach to Nunton and the Settlement Classification. (Odstock which is classified as a Small Village shares facilities with Nunton and there is dedicated public footpath between the two settlements. Odstock has a smaller population but 5 Community Facilities while Nunton has a larger population and up to 4 Community Facilities)². We consider that this approach is too prescriptive, inflexible and is not consistent with national and regional guidance. Representations have been made referring to PPS3 which does not advocate that

¹ Wiltshire and Swindon Structure Plan 2016 – April 2006. Core Document CPP/02

² Topic Paper 3 Settlement Strategy - June 2007 Core Document TOP/02 A

any categorisation of facilities is necessary to determine whether development is acceptable in a settlement.

- 2.2.5 The Longford Estate considers that there is an anomaly in the settlement strategy as set out in the Proposed Submission version of the LDF Core Strategy determining which settlements are Secondary Villages or Small Villages.

Conclusions

- 2.2.6 The Longford Estate considers other factors should be considered in the choice of settlements and that the absence of some facilities should not be seen as a “block” to development in an otherwise well provided village. Focusing on basic facilities is too prescriptive and inappropriate in terms of the approach to accommodating development. Other factors should be considered such as population, capacity for development, public transport infrastructure, landscape setting and evidence of future levels of need and demand (i.e. the utilising the SHMA) and the ability to sustain current levels of facilities and services .
- 2.2.7 Consideration should also be given to the relationship between settlements and groups of settlements. We note that this option was considered but was not pursued as the suggested examples were based largely on combined populations and there was no analysis available of the functional relationships between the component settlements.³ However, this matter could be pursued in the Site Allocations DPD and the “finer grain analysis” (paragraph 5.4 of the Proposed Submission Core Strategy – SWCS/01 A) that is to be undertaken to support it.

³ Topic Paper 3 Addendum 2: Sustainable Settlement Strategy July 2009 Core Document TOP/03 C

Q2.3 Why Choose this Distribution Strategy?

Policy CS1 adopts a strategy of distributing development between various settlements in the South Wiltshire with Salisbury taking the bulk of new housing and employment, a significant amount directed to Amesbury and more modest amounts in other settlements. Why was this strategy adopted rather than the options of a new settlement or an urban extension as referred to in paragraph 1.9 of the CS?

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- 2.3.1 The Core Strategy is based on the strategy set out in the emerging RSS 10⁴ - Policy CSS – The Core Spatial Strategy and the Development Policies A – C together with Policy HMA11- Salisbury HMA. The HMA policy did not include an Area of Search for an urban extension (unlike some of the other HMAs in the region) or a new settlement, believing that, on the basis of the housing requirement and the evidence discussed at the Regional Examination in Public, the level of housing growth could be accommodated.
- 2.3.2 The approach to distribution and providing suitable locations for housing is also based on PPS3⁵, in particular paragraphs 36, 37 and 38. These paragraphs provide the criteria to be used for selecting suitable broad locations and also identifying particular circumstances that may affect the distribution of housing development. The Core Strategy should reflect this advice.
- 2.3.3 However, the former Salisbury District Council examined a “new settlement” scenario in the consultation on the Preferred Options (February 2008), despite not being an objective of the emerging RSS or the Adopted Structure Plan, but this was rejected because of the environmental concerns raised by consultees.
- 2.3.4 The Longford Estate supported the strategy in the Proposed Submission Draft
- 2.3.5 The Strategy is based on the existing Community Areas, (the Community Areas have been used as a focus for the new Area Boards – see paragraph 2.1.3 above). Within these areas the Council aims to plan as far as possible for self containment, growth is focused on those settlements that have a range of facilities and services and where local housing and employment needs can be met in a sustainable manner.

⁴ RSS10 Proposed Changes(2008) Core Document ref RPP/02

⁵ PPS3 Housing (2006) paragraphs 36,37 and 38 Core Document ref NPP/03

Conclusions

2.3.6 The Longford Estate supports the spatial strategy as set out in the Core Strategy Proposed Submission Document, in terms of the overall level of growth and its distribution. However, the Estate has objected to the fact that some settlements have not been included as being capable of accommodating future growth, notably Nunton.

Q2.4 Proposed Levels of Growth in Settlements.

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

- 2.4.1 The proposed level of growth is primarily focussed on the first three tiers of the settlement strategy (paragraph 5.3 of the Core Strategy Proposed Submission – July 2009)⁶. This approach is consistent with national and regional guidance as referred to in the response to question 2.1 above.
- 2.4.2 However, it is unclear why the distribution in the Core Strategy differs from the distribution in the emerging RSS i.e. at least 6,000 dwellings to Salisbury SSCT and at least 6,400 to the rest of the District. The Core Strategy proposes 7,480 dwellings to Salisbury SSCT and 5,690 to the rest of the District. The Longford Estate understands that there is some logic in “over allocating” at the SSCT by 1,400 dwellings (7,480 – 6,000) because the Churchfields allocation is likely to be very long term, if at all, given that it is a working business park. This would reduce the SSCT figure to 6,380 dwellings, a 6% “overshoot”. However, it is not clear why the Rest of the District is some 700 dwellings short of the RSS provision, which seeks at least 6,400 dwellings.
- 2.4.3 The Longford Estate considers that there should be some development in the smaller settlements which would be in accordance with Development Policy C of the emerging RSS10 and in accordance with PPS 3 paragraphs 37 and 38, in particular the seventh bullet point in respect of the need to provide housing in rural areas. The distribution and the degree of urban focus was one of the issues that was extensively debated during the preparation of the emerging RSS for the South West.
- 2.4.4 The scale of growth in each Community Area has been included in the Core Strategy Proposed Submission Document. This seems to be very prescriptive when the Council state in paragraph 5.4 and again in paragraph 5.46 (d) of the Core Strategy Proposed Submission Document that:

“In order to identify non-strategic sites for development, which accord with the settlement strategy, it will be necessary to carry out a finer grain analysis of these settlements to identify further capacity to absorb growth.”

⁶ South Wiltshire Core Strategy Proposed Submission Document – July 2009 – Core Document ref SWCS/01 A

- 2.4.5 This analysis has yet to be undertaken; therefore the distribution of the dwellings figures should not be pre-determined by the Core Strategy and a degree of flexibility should be retained to take account of the finer grain analysis. The Core Strategy should redistribute at least 710 dwellings to the rest of the District (being the shortfall against the RSS provision i.e. at least 6,400 – 5,690 dwellings).
- 2.4.6 The Longford Estate has no issue with the housing figures being exceeded in the Salisbury SSCT but this should not be at the expense of the rest of the Salisbury Housing Market Area. The increase in provision in the Community Areas should then be made on the basis of Council's need assessment⁷, the size of the settlement and its function. The increase in the Southern Community Area should be accommodated at the larger settlements.

Conclusions

- 2.4.7 The Longford Estate notes that the actual numbers of dwellings within Community Areas will be dependent on availability of appropriate sites and subject to a Strategic Sustainability Appraisal DPD and that further consultation will take place on this document in due course. However, there is no timescale for this part of the process and it is assumed that the Sites Allocations DPD when prepared will be a single DPD for the whole of Wiltshire.

⁷ DCA Local Housing Needs and Market Survey (2006) Core Document ref STU/03

Q2.5 Removal of Housing Policy Boundaries.

Core Policy 1 states that new development will not be permitted other than in named settlements. The effect of this would be to remove the possibility of infill development, small scale development and redevelopment from a number of villages which previously had housing policy boundaries defined within the Salisbury District Plan. What is the justification for this? Why were these particular villages selected as being unsuitable for development?

- 2.5.1 We note that the Housing Policy Boundaries are proposed to be removed from those settlements not listed in the settlement hierarchy (A) to (E) and hence in future new development would not be appropriate in these locations.
- 2.5.2 We consider that this is a very prescriptive and inflexible approach. Whilst we recognise that the scale and nature of development in rural communities needs to be managed sensitively and more carefully than has been the case during the past 20 years, (if the approach is to accord with both national and regional policy guidance), nevertheless the strategy needs to reflect and accommodate the roles and functions of settlements in the Salisbury settlement hierarchy in addition to their relationships with their surrounding areas.
- 2.5.3 Some additional housing is still necessary to meet local needs and to address significant affordability problems. The emerging RSS states that targeted small scale development for housing in accessible village communities will be appropriate if it is clearly related to identified local needs. Therefore the emerging RSS is quite clear that adequate provision must still be made for additional development at the smaller towns and villages, in order to enable these rural communities to thrive. These points have been well covered in our response to the consultation on the Submission Document.
- 2.5.4 Salisbury District Council Topic Paper 2 Housing - June 2007 acknowledges the focus for most additional housing in rural areas should be in existing towns and identified service centres, but also notes that it will also be necessary to provide for some new housing to meet identified local need in other villages. However, the strategy in the Core Strategy Proposed Submission Document has focussed more on the towns.
- 2.5.5 Strict control over new housing in rural areas away from established settlements is supported, but we consider there are settlements, formerly recognised as Secondary Villages, which have the capacity and a role to accommodate a limited amount of

development to meet local needs and that will not compromise the overall strategy or undermine sustainability objectives.

- 2.5.6 Within the South Wiltshire Core Strategy there are examples where a more restrictive approach has been taken and some settlements have been “down graded” from a Secondary Village to the “smallest settlements in the countryside” category. We do not support the justification for this approach.
- 2.5.7 Nunton is an example of a settlement originally included as a Secondary Village, but now “down graded”. It has a population of between 101 – 250, and is larger than some of the villages now included in the Small Villages category of the Core Strategy Proposed Submission Document.
- 2.5.8 Nunton is an established settlement within the Southern Wiltshire Community Area and is capable of accommodating a limited amount of development. The South Wiltshire Community Area experiences a shortfall of affordable housing, access to service in the area is generally better than some of the other more remote rural areas in the west and south of Wiltshire.
- 2.5.9 There is an issue over those villages that now fall into the category of “Other Settlements and the Countryside”, i.e. “washing over” 66 villages that previously contained settlement boundaries, with the countryside designation. This also has implications for households wishing to extend or replace their properties. In both cases such improvements represent an efficient means of improving the housing stock and should not be discouraged by constraints envisaged by countryside policies compared with policies which recognise the vitality and role of settlements.
- 2.5.10 There is an acute shortfall in affordable homes (Local Housing Needs and Markets Survey 2006.) which is included in the Council’s evidence.

Conclusions

- 2.5.11 The Longford Estate considers the approach in Core Policy 1 is too prescriptive and lacks flexibility, undermining the overall effectiveness of the Plan, given the advice in PPS3. The adopted Local Plan⁸ defined housing policy boundaries but also enabled a flexible approach recognising that opportunities exist within the built up area of a number of settlements in the plan area for infilling, small-scale development or

⁸ Adopted Salisbury District Local Plan - June 2003. Core Document ref LPP/01

redevelopment. For all these settlements a Housing Policy Boundary was established and which clearly indicated the area within which development would, in principle, be acceptable. Development would have taken place on unidentified sites within these settlements through conversions, infill development, small development sites and redevelopment. Such development would have continued to assist in meeting local needs as identified by the DCA Study and particularly the forthcoming Strategic Housing Market Assessment (SHMA).