

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

**MATTER 3 : CORE POLICY 2
DISTRIBUTION OF DEVELOPMENT
STRATEGIC ALLOCATIONS**

**ON BEHALF OF
PERSIMMON HOMES AND
THE WILTON ESTATE**

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Q3.1 Strategic Allocations – Why Strategic?

Core Policy 2 identifies nine Strategic Allocations which would provide a significant proportion of the housing land to be found in South Wiltshire and much of the employment land. These are Fugglestone Red, Hampton Park, Longhedge (Old Sarum), Churchfields and Engine Sheds, UKLF, South of Netherhampton Road, Central Car Park, Kings Gate Amesbury and the former Imerys Quarry. Are all of these sites truly strategic in the sense that they are central to the achievement of the strategy (PPS12 paragraph 4.6)?

- 3.1.1 PPS12 para 4.6¹ confirms it is appropriate for a Core Strategy to allocate strategic sites for development. However, this should be done if those sites are considered central to the achievement of the strategy. It is clear from the final sentence of PPS12 para 4.6 that the Government's intention is to expedite the delivery of the Development Plans, which should not be held up by the inclusion of non-strategic sites.
- 3.1.2 Persimmon Homes and the Wilton Estate consider that the Council has not sought to include non-strategic sites in the Core Strategy. It is to be commended for the progress made, to date, on the South Wiltshire CS. Smaller non-strategic sites at the villages and smaller towns can be resolved through a subsequent Site Allocations DPD, either for South Wiltshire or Wiltshire-wide, in due course. Thus the delivery of the South Wiltshire CS has not been 'held up', despite the additional complications associated with Local Government Reorganisation in Wiltshire.
- 3.1.3 The nine sites identified are, in the main, larger than 500 dwellings or employment or mixed use schemes delivering housing and employment or retail. With the exception of Kings Gate, Amesbury, the rest are located at the Salisbury SSCT, as envisaged by RSS10 Policy HMA11². Amesbury, however, is by far the second largest settlement in South Wiltshire and therefore it is appropriate to identify a Strategic Allocation at the town (Kings Gate is a logical continuation of the Archers Gate development) to address the continuing need and demand for housing to serve the town and its hinterland, which has a key role in support of the Salisbury SSCT within the Salisbury TTWA.
- 3.1.4 In combination, the Strategic Allocations will make provision for approximately 6,000 additional dwellings. This equates to approximately 48% of the RSS10 dwelling requirement set out in Policy HMA11. More importantly, the Strategic Allocations at

¹ PPS12 Para 4.6 (2008) NPP/12 A

² RSS10 Proposed Changes Policy HMA11 (2008) RPP/02

Salisbury SSCT, total some 4,700 additional dwellings, equate to approximately 78% of the specific requirement for the SSCT itself. At the heart of RSS10³ and national policy⁴ is the expedited delivery of new housing to achieve the 'Step Change' and an urban focus to reduce travel, to achieve greater self containment and to deliver new housing where new jobs are expected to occur.

3.1.5 Similarly, in the case of new employment land and retail floor space, the Strategic Allocations will focus new job growth at the Salisbury SSCT and identify the proposed location of the 'About 37 ha' of employment land to be provided in the Salisbury TTWA, as set out in RSS10 Policy HMA11.

3.1.6 The identification of the majority of the housing land and employment land at the Salisbury SSCT, at an early stage, is essential to the delivery of the urban focus sought by RSS10. This reflects the advice in PSS12 para 4.6, in that the alternative of deferring the identification of the Strategic Allocations at Salisbury SSCT and elsewhere until the Wiltshire-wide Core Strategy or a Site Allocations DPD is prepared would significantly delay the delivery of much needed new housing and employment land at Salisbury. It is central to the achievement of the 'spatial strategy', set out in the CS, that there should be an early 'Step Change' in housing delivery to address the shortage of affordable housing and the backlog of unmet housing need from the previous Structure Plan/Local Plan. It is noted that the Adopted Wiltshire and Swindon Structure Plan 2016, which covers the period 1996 – 2016, seeks provision to be made at Salisbury Strategic Service Centre (SSC) for 3,900 net additional dwellings. However, by April 2009⁵ only 2,150 dwellings had been completed, with seven years remaining and an identified shortfall in the known commitments which would not meet the Structure Plan requirement. The Structure Plan envisages 195 dwellings per annum to be provided at Salisbury. However, in the first 13 years of the plan an average of only 165 dwellings per annum had been achieved. Thus by April 2009 there was already a backlog of 390 dwellings.

3.1.7 Given that the degree of urban focus for Salisbury SSCT increases in the RSS to 300 dwellings per annum from 2006, it is essential that the Council identify the preferred locations for the majority of the new development in the CS if the RSS dwelling provisions are to be achieved.

³ RSS10 Proposed Changes Policy CSS & Development Policy A (2008) RPP/02

⁴ PPS 3 Housing Para 2 (2006) NPP/03

⁵ Housing Land Availability (2009) Wiltshire Council

3.1.8 The Fugglestone Red Strategic Allocation is the largest of the proposed 'Strategic Allocations' identified in Core Policy 2 and is expected to deliver some 1,250 dwellings and 8 hectares of employment land. This equates to approximately 21% of the Salisbury SSCT provision and approximately 22% of the 37 hectare provision for the Salisbury TTWA. It has a key role in the delivery of the West Salisbury Academy and will also bring forward a new primary school, local centre and extensive Green Infrastructure, together with a mix and range of affordable and general market housing and new employment opportunities. Therefore, in view of its scale, location, relationship to other policy objectives, and content the Fugglestone Red proposal is truly strategic and central to the achievement of the South Wiltshire Core Strategy and thus should be allocated in the CS.

3.1.9 Certainty and predictability are central to planning and the 'Plan Led' system⁶ and therefore, in light of the above, and the pressing need to establish the long term directions of growth for Salisbury it is appropriate for the CS to identify the proposed Strategic Allocations. This will enable early planning applications to be prepared, ahead of any Site Allocations DPD, to facilitate an increase in the delivery of housing and other development at Salisbury SSCT.

Conclusions

3.1.10 Persimmon and Wilton consider that the nine sites identified in the South Wiltshire Core Strategy are sufficiently 'Strategic' and merit inclusion in the Core Strategy as they are central to the achievement of the strategy. It is noted that the progress with the CS has not been held up due to the inclusion of numerous non-strategic sites.

3.1.11 The Fugglestone Red Strategic Allocation is the largest Strategic Allocation identified in the CS at the Salisbury SSCT. In light of its scale, mix of uses, relationship to other projects its achievement is truly central to the spatial strategy for Salisbury.

⁶ PPS1 Delivering Sustainable Development Para 8 (2005) NPP/01A

Q3.2 Strategic Allocations – How and Why Selected?

What criteria were used in selecting the Strategic Allocations? Why were they selected and alternatives rejected? Are these sites in the most sustainable locations; do they respect local character and the local environment; do they have the best access to local services and employment; and are they otherwise suitable when judged against the criteria used for site selection in the CS?

3.2.1 This question poses a series of sub-questions which are addressed in turn below.

What Criteria were used in selecting the Strategic Allocations?

3.2.2 The reasons for selecting the proposed Strategic Allocations and the criteria used by the Council are set out in the Core Strategy Evidence Base. In particular Topic Paper 19 Papers 1⁷ and 2⁸ present the background to the selection of the Strategic Allocations. It can be noted that a constraints mapping exercise was the starting point, having regard to known environmental constraints, areas subject to flood risk, conservation and heritage constraints, national level landscape designations, military and Garrison land and the extent of the existing built up areas. Map 7 of Topic Paper 19 Paper 1 helpfully presents the extent of constrained land and relatively unconstrained land. It can be noted that land at Fugglestone Red is located within the defined unconstrained land.

3.2.3 The unconstrained land was then subject to further assessment having regard to national planning policy, account was also taken of the response to the Issues & Options consultation. Persimmon and Wilton note that 71% of respondents agreed or strongly agreed with the Fugglestone Red option with only 9% disagreeing, the remaining 20% neither agreed or disagreed. Therefore, land to the north west fringes of Salisbury (Fugglestone Red) was selected as a Preferred Option.

3.2.4 Topic Paper 19 Paper 2 elaborated and refined the strategic site selection process and sought to identify specific sites. A Landscape Assessment informed this stage and identified locations where there was potential for strategic allocation (See Map 6

⁷ South Wiltshire Core Strategy Topic Paper 19 Identification of Strategic Growth Areas Paper 1 (February 2008) TOP/19A

⁸ South Wiltshire Core Strategy Topic Paper 19 Identification of Strategic Growth Areas Paper 2 (July 2008) TOP/19B

Paper 2⁹). Land at Fugglestone Red was confirmed as a suitable location for a strategic allocation.

Why were they selected and alternatives rejected?

3.2.5 As stated above, the Council adopted a methodical and rational approach to the identification of the proposed Strategic Sites throughout the preparation of the CS, informed by an extensive initial constraints sieve assessment, coupled with consideration of the relationship with national and regional policy and detailed landscape assessment. Account was also taken of the community consultation response. The nine Strategic Sites were selected for inclusion in the CS following extensive assessment and public consultation. Alternative potential strategic allocations were rejected for a variety of reasons. These reasons are explained in Topic Papers 1 & 2.

Are these sites in the most sustainable locations?

3.2.6 Persimmon and Wilton consider that Fugglestone Red is a sustainable location, suitable for identification as a Strategic Allocation for the reasons outlined in the Council's evidence base.

3.2.7 The relative suitability of the other Strategic Allocations and their overall sustainable can be derived from the Topic Papers, in particular Topic Paper 19, and their performance in the sieve assessment and more detailed constraints analysis.

3.2.8 Compared to other less suitable and less sustainable options, the selected Strategic Allocations are considered by the Council as being the most sustainable locations. The merits of each site differ relative to their respective locations and the various constraints that exist at different parts of the Salisbury and Amesbury area. Therefore, a direct 'Beauty Parade' prioritisation of the proposed sites would be unhelpful given the scale of development to be provided at Salisbury as set out in RSS10 Policy HMA11. Persimmon and Wilton note that the 'Site by Site' consideration in Matter 5 will also inform the answer to this question but in general terms Persimmon and Wilton support the identification of these sites as being appropriate sustainable locations for new development.

⁹ Map 6 Topic Paper 19 Paper 2 (July 2008) TOP/19 B

Do they respect local character and the local environment?

3.2.9 The Fugglestone Red Strategic Allocation has been selected by the Council and it is considered to respect local character and the local environment. The character of the South Wiltshire HMA is summarised in the Council's Evidence Base. The initial constraints assessment sought to ensure that the wider local character and environment was respected as part of the Strategic Allocations selection process. (See Topic Paper 19 Paper 1)¹⁰

3.2.10 The consideration of the more detailed local character and environment was undertaken at the next stage. The Landscape Character Assessment by Chris Blandford Associates (2008)¹¹ and Salisbury Landscape Settlements Settings study (2008)¹² informed the Council's assessment of potential impact on local character and environment.

3.2.11 Strategic Development will inevitably mean that some change will occur to the local character and environment. Persimmon and Wilton note that the Fugglestone Red site has also been subject to site specific detailed examination to assess constraints and inform the emerging masterplan to ensure, as far as practicable, that local character and the environment is respected at North West Salisbury. The Fugglestone Red Environmental Appraisal (February 2010)¹³ contains inputs from Pegasus Environmental, Ecology Solutions, AC Archaeology, noise consultants Cole Jarman Associates and Air Quality Consultants AQC. It presents further information on landscape and visual issues, ecology, archaeology and cultural heritage, noise and air quality. This work has been discussed with the Council and others and informed the emerging masterplan and the detailed planning of the Fugglestone Red Strategic Allocation to date.

3.2.12 It should be noted that the proposed Strategic Allocations will be subject to Environmental Impact Assessment in due course and Design and Access Statements will be prepared. In combination these documents will set out how any potential impacts on local character and the environment will be addressed by the proposed Strategic Allocations.

¹⁰ Topic Paper 19 Paper 1 (2008) TOP/19A

¹¹ Salisbury District Landscape Character Assessment CBA (2008) STU/20

¹² Salisbury District Landscape Settlements Settings CBA (2008) STU/21

¹³ Fugglestone Red Environmental Appraisal PPG (2010)

3.2.13 The analysis of Fugglestone Red respects local character and environment and was based on a consistent and comprehensive analysis carried out by the Council and as this same analysis was applied to all sites Persimmon and Wilton consider the same conclusions can be applied to all the Strategic Allocations.

Do they have the best access to local services and employment?

3.2.14 The degree of accessibility to local services and employment varies across the proposed Strategic Allocations depending upon their location.

3.2.15 A point to note is that the larger Strategic Allocations, such as Fugglestone Red, will be comprehensive mixed use developments that will include local services and employment.

3.2.16 The Fugglestone Red scheme will include a new primary school, centrally located for easy accessibility by foot and cycle by the new residents. Furthermore, the Fugglestone Red scheme will be adjacent to the proposed new West Salisbury Academy, currently Salisbury High School. It will be connected to the Academy site to facilitate connectivity by foot, cycle, public transport/school buses and the private car. The Fugglestone Red scheme will also include a local centre, also centrally located adjacent to the new primary school and close to the Devizes Road. This will include potential health care facilities and local retail provision. Thus a high degree of accessibility to local services will exist at Fugglestone Red.

3.2.17 The Fugglestone Red site will also include 8 hectares of employment land. This will provide the opportunity for the new residents to live and work in close proximity. New employment opportunities will be created at the new West Salisbury Academy, the Primary School and local centre. The Fugglestone Red site is relatively close to the employment proposals at Imerys Quarry and the UKLF site.

3.2.18 The relative merits of the other Strategic Allocations vary. Some are closer than others, in terms of their proximity to existing employment and local services. However, all of the proposed Strategic Allocations are sufficiently well located to be regarded as being accessible to an adequate range of local services and employment.

Conclusions

3.2.19 The proposed Strategic Allocations have varying degrees of accessibility to local services and employment. However, the proposed enhanced provision of employment and local services at the urban extensions will improve overall accessibility to the benefit of new and existing residents.

3.2.20 Persimmon and Wilton do not contest that any of the proposed Strategic Allocations should be omitted from the CS in light of any perceived “inaccessibility”.

Are they otherwise suitable when judged against the criteria used for site selection in the CS?

3.2.21 The proposed Strategic Allocations are considered otherwise suitable when judged against the criteria used for site selection in the CS.

3.2.22 The Fugglestone Red allocation is well located to the existing urban area and offers the opportunity to secure improved linkages between the new development and Bemerton Heath and Fugglestone Red (Phase I). It is highly suitable for development and will play a key role in enhancing the provision of social and community infrastructure serving North West Salisbury.

3.2.23 It will promote balanced growth through the delivery of homes, jobs and services in a geographically balanced manner, to reduce the need to travel. It will provide a choice of employment opportunities.

3.2.24 Persimmon and Wilton do not seek to argue that the proposed Strategic Allocations are otherwise unsuitable for development, when judged against the criteria used for their selection in the CS.

Conclusions

3.2.25 Based on knowledge of Fugglestone Red, Persimmon Homes and the Wilton Estate consider that the Strategic Sites were identified in a transparent and rational manner having regard to a variety of site selection criteria and policy considerations through the preparation of the CS, including extensive public and key stakeholder engagement and consultation. Therefore, the Strategic Allocations, in particular land at Fugglestone Red, are appropriate locations for new development.

Q3.3 Mixed Use and Self Containment

For the most part the Strategic Allocations would be mixed use sites. What evidence is there that this would reduce the number of trips by car and promote self containment?

- 3.3.1 Persimmon Homes and the Wilton Estate note that for the most part the Strategic Allocations would be mixed use sites. The evidence that this would reduce the number of trips by car and promote self containment can be found in various national¹⁴ and regional planning policies¹⁵, good practice and experience from other development.
- 3.3.2 Whilst it is acknowledged that planning process can not force people to work in particular locations or live at certain settlements or within specific developments, it can provide the opportunity for future residents of mixed use urban extensions to work locally. As climate change considerations become more central to people's behaviour, decisions and travel patterns; fuel costs increase and public transport provisions improves, it is expected that the majority of people in the South Wiltshire HMA would wish to live relatively close to their place of work or even work from home, subject to the availability of technology etc. Home working and 'Part Home' working is a growing trend in South Wiltshire and elsewhere.
- 3.3.3 It should be noted that not all future residents will be economically active, particularly in light of the demographic profile and the increased elderly population.

Conclusions

- 3.3.4 Persimmon Homes and the Wilton Estate consider that the evidence to support the concept that mixed use development would reduce the number of trips by car and promote self containment is set out in a variety of national and regional planning policy and Good Practice and experience elsewhere.
- 3.3.5 Experience elsewhere on major urban extensions supports the general "common sense" that many people choose to live close to their place of work, subject to the availability of suitable and affordable housing. The Strategic Allocations in the CS provide the opportunity for this to happen.

¹⁴ PPG13 Transport (2001) NPP/13

¹⁵ RSS10 Policy SD4 (2008) RPP/02