

WILTSHIRE COUNCIL

**SOUTH WILTSHIRE CORE STRATEGY DEVELOPMENT PLAN
DOCUMENT**

SUBMISSION DRAFT

HEARING STATEMENT

IN RESPECT OF MATTER 3

**PREPARED BY PRO VISION PLANNING AND DESIGN ON
BEHALF OF BEMERTON FARMS**

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SOUTH WILTSHIRE CORE STRATEGY EIP

MATTER 3

NOTES ON BEHALF OF BEMERTON FARMS

- **Question 3.1 Are the allocations truly strategic?**
1. The Draft RSS proposes 9200 dwellings for the Salisbury HMA with 5000 directed to the City (the “Draft RSS” Figures).
 2. The Proposed Changes based on the Panel Report propose 12,400 dwellings for the HMA with 6000 directed to the City and 6,400 directed to the rural areas (the ‘PC’ figures).
 3. The Core Strategy actually seeks to deliver 7480 dwellings to the City (the CS figures), incorporating a proportionate share of the 6400 houses expressed in the RSS as being preferred for the rural areas (as explained in full in the Council’s Topic Paper 3 Addendum 2: Sustainable Settlement Strategy (July 2009)). The Council has directed a higher level of housing to ‘the City’ than suggested in the RSS because (1) some of the identified strategic sites are technically within rural Community Areas rather than ‘the City’, (2) the City is so functionally dominant within the South Wiltshire area and (3) the City is well served by basic facilities in relation to the remainder of South Wiltshire.
 4. The South Wilts SHLAA identifies a PDL capacity for 1816 dwellings at Salisbury.
 5. Therefore the Core Strategy must achieve the following numbers of greenfield dwellings at Salisbury:
 - 3184 to meet the Draft RSS figure, or
 - 4184 to meet the PC figure, or
 - 5664 to meet the CS figure.
 6. Topic Paper 19 demonstrates clearly that there is no large area adjoining Salisbury that is sufficiently un-constrained to accommodate 3184 dwellings, let alone more.
 7. Furthermore, a key reason for bringing forward the CS is housing delivery and the need to address previous housing shortages.
 - a) One or two large extensions could be delayed by a landowner or developer or by the circumstances surrounding the site as has happened in the past in this District and elsewhere (see Appendix A in particular Andover, Dorchester and Taunton). Should one or two large extension be pursued and delayed / not delivered it would seriously compromise housing delivery across the District due to there not being a fall back position (i.e. other sites making up the overall housing numbers).

- b) Experience also shows that development by a number of developers on a number of sites is likely to deliver faster overall housing sales (i.e. faster delivery) than just one of two developers (see Appendix A in particular Basingstoke and the Isle of Wight); Myddelton & Major (see Appendix B) advise that land south of Netherhampton Road could deliver 50 units p.a. with one housebuilder / brand but more than one housebuilder could potentially achieve a rate of up to 100 units p.a.
8. Therefore the CS is right to follow a strategy based on a number of medium sized greenfield urban extensions. For that reason and our paragraph 5 above we consider that it is right to regard the selected allocations as central to the achievement of the strategy, particularly as housing delivery is crucially important due to the current housing delivery shortfalls. They are therefore correctly described as “strategic”.
- **Question 3.2 Strategic Allocations – How and why selected?**
9. **Appendix C** attached summarises our strategic appraisal of the selected sites and other potential greenfield locations which have not been selected. It comprises:
- 1 - Table 1
 - 2 - Key
 - 3 – Plan ref: 937/SERV01 showing 2km, 3km and 4 km distances from City Centre in relation to greenfield strategic allocations and other greenfield locations.
 - 4 – Plan ref: 937/AO1 showing 2km circle around centre of each greenfield strategic site.
10. Although not as in-depth as the Council’s own appraisals (including pages 54 and 55 of the council’s Topic Paper 19 – Identification of Strategic Growth Areas (2008)), we carried this out to satisfy ourselves that the Council’s selection of sites is sound. The factors chosen are only those in which the sites **differ**. All, for example, are within comfortable walking distance of an existing / proposed primary / junior school.
11. Table 1 indicates that none of the other potential greenfield locations appears to offer a better choice than the Strategic Allocations selected by the CS, and for the most part would be worse.
12. **Appendix D** (additional notes) attached provides additional information on land south of Netherhampton Road (Foxmore Park).
13. **The Additional Notes** demonstrate clearly that development on Foxmore Park would:
- a) Be within 2km or so of local and city facilities.
 - b) Present only a low risk to Archaeology, Conservation or the Historic Environment.
 - c) Have virtually no effect on the most significant views.
 - d) Not affect any known habitat of ecological value.
 - e) Avoid flood risks, both on site and elsewhere.

- f) Be capable of being served by the existing Petersfinger Sewage Treatment Works.
 - g) Bring community benefits in the form of
 - Enhanced and new POS and playing fields.
 - Better bus services.
 - Increased employment opportunities within walking distance of Harnham, and
 - A local centre for western Harnham.
 - h) Be deliverable.
14. **The Illustrative Master Plan** (submitted as a separate accompanying report) demonstrates how the site can achieve 400 dwellings, 10 hectares of employment land and a local centre whilst:
- Creating a coherent layout;
 - Respecting landform and neighbouring uses;
 - Respecting views;
 - Respecting the surrounding historic environment;
 - Providing adequate access;
 - Avoiding flood risk zones;
 - Supporting and enhancing strategic planting;
15. **Size of Allocation:** the Illustrative Masterplan shows the allocated site may be larger than is needed for 400 homes and 10 Ha employment. However, we consider the full allocation proposed by the CS should be included, to allow for:
- a) Strategic planting (not shown);
 - b) Any additional land required for sustainable drainage systems;
 - c) More P.O.S / playing fields than shown, (for example, if joint use of neighbouring LPA playing fields does not materialize as intended); and / or
 - d) More than 400 homes and additional non residential development (see Matter 4).
16. The land identified as forming the strategic allocation forms part of our client's wider land holding of 236 hectares. A significant amount of this land holding does not form part of the allocation and will continue to be managed by Bemerton Farms as agricultural land. The area retained will be of a sufficient size to form a viable agricultural unit.
17. **Landscape relationship:** Map 4 of the Council's Topic Paper 19 – 'Identification of Strategic Growth Areas' identifies the outer ridgelines around Salisbury clearly demonstrating that land south of Netherhampton Road is comfortably within these outer ridgelines. The outer ridgeline to the south of Salisbury is at 110m, extending around the circumference of Salisbury the 110m contour line dissects through the strategic Greenfield site at Fugglestone Red and part of the existing built form to the north of Salisbury.
18. The Illustrative Masterplan (submitted as a separate accompanying document) and Aerial Photographs (Appendix E) show:

- a) The west end of the Harnham Hill ridge and scarp would be fully protected and become P.O.S in full or in part above the existing building line (taller development would be located along the lower contours in line with the principle of locating taller buildings and higher density development closer to Netherhampton Road and the proposed Local Centre);
- b) The main development area is framed by the Harnham Hill and the existing edge of Harnham to the east, the ridge and scarp marked by the Old Shaftesbury Drove and Salisbury Racecourse to the south, and the Livestock Market and Golf Course tree planting to the west;
- c) Between Harnham Hill, the Racecourse and the Livestock Market is something of a natural fold in the landform that is like a bowl or amphitheatre. Our assessment is that up to about the 75m contour development could fit within and respect the landscape form and setting;
- d) Tree belts to the south and west to create strong and defensible boundaries to the proposed allocation could be incorporated into the development. Existing boundaries to built form adjacent to the proposed allocation are poorly defined and provide very little in the way of screening.
- e) Views from and across the site towards the Cathedral will be retained comprising a key feature of the development;

- **Question 3.3 Mixed use and self containment**

19. Six of the nine proposed Strategic Allocations would be mixed use sites [in accord with PPS1 (27ii) and PPG13 (30)]. Foxmore Park would accommodate the largest area of employment - 10 hectares and the largest ratio of proposed employment space to proposed dwellings:

Site	Housing	Employment	Employment: Housing Ratio
Fugglestone Red	1250 dwellings	8 ha	0.0064 ha per dwelling
Longhedge (Old Sarum)	800 dwellings	8 ha	0.01 ha per dwelling
Chrurchfields & Engine Sheds	1100 dwellings	5 ha to be retained	0.0045 ha per dwelling
UKLF	450 dwellings	3 ha	0.0066 ha per dwelling
South of Netherhampton Road	400 dwellings	10 ha	0.025 ha per dwelling
Central Car Park	200 dwellings	Up to 40,000 sqm gross external area (leisure & retail)	N/A

20. Foxmore Park would provide residential (including retirement accommodation), employment, a local centre, primary school and potentially a hotel and public house. These could all provide local benefits for existing residents of Harnham, reducing distances travelled to reach day to day facilities, as well as benefiting future residents.
21. There are existing local facilities within 2km and the City Centre is within 2.5 – 3.5km. As distances between homes and services are reduced there is an increased likelihood that people will walk (as indicated in PPG13). The provision of a variety of facilities in close proximity to each other would also encourage linked trips further reducing trip generation and promoting self containment.
22. Furthermore the site adjoins existing residential and employment land (although it should be noted that Figure 3.3 of the Council's Settlement Setting Assessment (2008) shows an area of industrial development immediately west of the built up area of Harnham which has now been partly redeveloped for housing giving a false impression of the balance between residential and employment land), and would thus provide the greatest balance between housing and employment, and the greatest opportunities for creating self containment and reducing car trip generation and promoting more sustainable modes of travel. Furthermore the site is only a 2.55km walk / cycle from the City Centre - nearly half the road distance - thus further encouraging walking and cycling.
23. The Department of Communities and Local Government document "Mixed Use Development, Practice and Potential" (March 2002) concluded that in mixed use schemes:
 - *"There is wide variation in car ownership and usage, but, as expected, a high proportion of households has no car, with the average well below 0.5 car per household;*
 - *A small but significant proportion of households has given up their car since moving into the development; and most car-owning residents say they use the car less than before".*

Appendices

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