

Matter 4: Core Policy 1 – Distribution of Development – Other Sources of Land for Development

Questions 4.1, 4.2, 4.3 and 4.5

- 4.1 Shieldtype has not undertaken any specific research concerning the merits of the housing allocations proposed to be saved from the Salisbury District Local Plan. These are matters for the Site Specific Allocations Development Plan Document process. The only relevant comment which can be made is why have these allocations not been developed? The lack of development over a prolonged period (i.e. not just over the past two years when there has been an economic downturn) suggests there are problems of delivery.
- 4.2 Other than Old Sarum, is it appropriate for the Core Strategy to refer to the saved housing allocations from the Salisbury District Local Plan? These sites are not strategic allocations as defined by PPS12. It is properly a matter for the Site Specific Allocations Development Plan Document to consider the merits or otherwise of these sites against all other possible allocations having regard to up to date policies. The saved allocations should have no particular status in the Core Strategy.
- 4.3 For the reasons provided in these written submissions, further growth at the SSCT to be allocated via the Site Specific Allocations Development Plan Document is an appropriate and necessary strategy for the Core Strategy to adopt. It is also considered that the future Development Plan Document should be provided with the maximum flexibility, within the strategic policy framework, to consider the location of growth. The Site Specific Allocations Development Plan Document will be more effective and responsive by reason of this flexibility.
- 4.4 It is recognised that the phraseology contained in the Core Strategy concerning '*Strategic Areas of Search*' is unfortunate having regard to their omission from the Key Diagram. However, it is appropriate that these areas are not defined in the Core Strategy to maintain the flexibility required to ensure that the future Development Plan Document can be effective.

- 4.5 As part of Shieldtype's original objection to the Core Strategy a proposal was made (supported by a plan) that it would be useful to include a diagram within the Core Strategy which defines the general extent of Salisbury as a SSCT.
- 4.6 In Shieldtype's view the extent of the SSCT should include the city and the adjoining Parishes (i.e. principally Britford, Laverstock, Netherhampton and Quidhampton) or at least the immediate hinterland of the urban area Salisbury (i.e. say up to 1km for the urban area boundary of greater Salisbury which includes Harnham Laverstock, Milford, and Stratford sub Castle). This would improve the flexibility and effectiveness of the Core Strategy and only indicate a broad geographical area within which future growth should be accommodated as part of the Site Specific Allocations Development Plan Document. This approach would not mean all the land within the defined SSCT is suitable for development but it would avoid the need for the definition of specific *Strategic Areas of Search* at this stage to retain maximum flexibility.
- 4.7 If *Strategic Areas of Search* are defined in the Core Strategy at this stage then there will be issues associated with such a late and material change to the policies. In addition to issues associated with the Sustainability Assessment, there would potential issues of prejudice to landowners and developers not included in the *Strategic Areas of Search*. The alternative strategy of defining the SSCT would, to a large extent, address these possible objections by reason of flowing from the RSS policy requirements and not being too specific about the location of any growth.
- 4.8 Some of the *Salisbury Vision* sites are constrained by existing land uses which may mean that they do not come forward for residential development as envisaged. However, Shieldtype does not have any site specific evidence that will assist the Inspector on this particular matter which will be debated at the Examination in Public. Again, the merits of any *Salisbury Vision* site ought to be considered alongside other potential allocations via the Site Specific Allocations Development Plan Document.
- 4.9 Within the former Salisbury District, windfall sites have involved the redevelopment of existing houses or the re-use of large gardens. As a consequence, the general character and appearance of significant parts the city's urban area have been eroded and this has caused an outcry from some sectors of the community. Indeed, there are policies emerging in the Core Strategy aimed at protecting and maintaining the character of residential area to address this threat.

- 4.10 The reaction against so called '*garden grabbing*' and '*town cramming*' has recently be highlighted by the Ministerial Statement on 19 January 2010 and the proposed changes to Planning Policy Statement 3: *Housing*. It is being emphasised that just because a site is within the curtilage of a property it does not automatically mean that this previously developed land is necessarily suitable for housing, nor that all the curtilage should be developed.
- 4.11 Despite the fact that windfall sites cannot be included within the first 10 years of the plan period, some 501 dwellings of the Core Strategy's housing requirement is forecast to be met from such sites. These windfall sites would be in addition to the supply from existing consents, the Vision sites and the sites contained in the Strategic Housing Land Availability Assessment (SHLAA). All these sites are generally within the urban area.
- 4.12 At the current time it is somewhat surprising that there can be any certainty that there will be the windfall sites being delivered post 2020 which will yield a net increase in the number of dwellings being forecast – at best it is '*crystal ball gazing*'. Windfall sites are a finite supply, there are clear community pressures against '*garden grabbing*' and '*town cramming*' and, accordingly, such sites cannot be relied upon to continue coming forward for development. Reliance on this element of the housing land supply ought to be significantly reduced and provision made for the Core Strategy's housing requirement to be met from specific residential allocations.
- 4.13 By reason of scale, the merits of *Salisbury Vision* and SHLAA sites are generally matters for detailed consideration as part of the Site Specific Allocations Development Plan Document. It would be inappropriate for the Core Strategy to ascribe any elevated status to these sites for development purposes. Instead, the information contained in these documents should be treated as indicative to demonstrate that some development could be accommodated within the urban area of Salisbury.