

# Wiltshire Housing Site Allocations Plan (WHSAP) Examination

## MATTER 3: Housing Site Allocations (sites H3.6 and H3.7)

Written Statement on behalf of Lincoln College Oxford (ID 393560)

### Summary and purpose

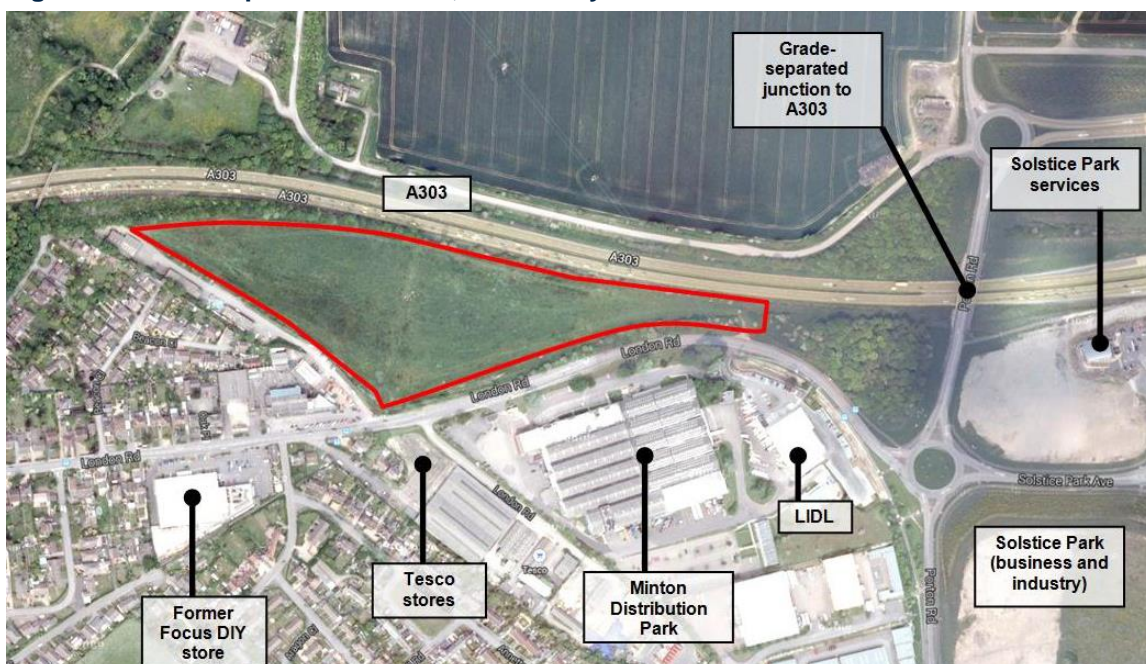
This document is submitted on behalf of Lincoln College (Oxford), to assist the Inspector in his examination of the approach in relation to the Amesbury Community Area ('CA').

Lincoln College objects to the WHSAP in relation to its provisions for the Amesbury CA, as they fail several of the Tests of Soundness prescribed under NPPF paragraph 35. In summary:

1. They are not **positively prepared**, failing to meet the objectively assessed need of the CA, with the total quantum of development falling far below the relevant target in the adopted Wiltshire Core Strategy (WCS).
2. They are not **justified**, because they:
  - are not an 'appropriate strategy', having under-allocated against WCS policy for the Amesbury CA, allocating only around **16% of its housing requirement**
  - do not duly taking into account 'reasonable alternatives', particularly the alternative of allocating an amount of housing that reflects the requirement for this CA sought under the WCS
  - are inconsistent with (and directly contrary to) the evidence base.
3. They are **inconsistent with national policy**, departing from various provisions in the NPPF concerning the need to significantly boost the supply of housing and to do so in accessible locations with good access to employment, services and facilities.

As a result of the above, the policies for the Amesbury CA cannot be found sound. However, the plan is capable of being made sound by means of including a further housing site, such as that at London Road, Amesbury (site ref 3379, identified in the location plan below), either in addition to or instead of the two small allocations at Durrington.

Figure 1: Location plan of site 3379, incorrectly excluded from the WHSAP



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### 5.3 What is the likely impact of the proposed development on the following factors and do any of these indicate that the site should not be allocated:

- biodiversity, in particular but not restricted to European protected habitats and species
- green infrastructure and agricultural land
- landscape quality and character
- heritage assets
- strategic and local infrastructure including transport
- the efficient operation of the transport network, highway safety
- air and water quality, noise pollution, odours, land stability, groundwater and flood risk
- open space, recreational facilities and public rights of way

There are potential concerns in relation to the two highlighted points above on both sites H3.6 and H3.7.

Both of these sites are positioned in areas that the Council's landscape evidence base, prepared by Chris Blandford Associates<sup>1</sup>, confirms is a "*Distinctive and Supportive Landscape*". This is in contrast to the College's site at Amesbury (3379), which is located in an area that (in common with the wider built-up part of the town) is neither distinctive nor supportive. In addition, both the allocated sites are positioned within 'key low level views' to the town. For the Inspector's ease, reference should be made to Figure 4.8 of Chapter 4 of the Chris Blandford Associates document.

Additionally, reference should be made to the more recent TEP landscape study<sup>2</sup> which highlighted that site 3179 (Larkhill Road) had a "Low" capacity to accommodate change. In contrast, the same study found that the College land (3379) had a "Moderate-High" capacity to accommodate change.

With regards to the Clover Lane site proposed to be allocated (H3.6), we note the following passages from the draft WHSAP:

*"5.155 The site lies adjacent to the Durrington Conservation Area to the east and a number of Listed Buildings. Detailed design and layout would need to preserve or enhance the character of the Conservation Area and this is particularly important for the eastern portion of the site. Development should minimise the potential for harm to the significance of Listed Buildings and the Conservation Area. Informed by a Heritage Impact Assessment these considerations should be resolved through the detailed design and layout of a scheme.*

*5.156 There is a tree belt adjacent to the northern boundary of the site which is protected by a group Tree Preservation Order and there are substantial hedgerows to the western boundaries. Mature trees and hedgerows must be retained as important features of the site, and additional green infrastructure should be incorporated to enhance and protect these features in order to ensure a soft edge to the open countryside. A layout can link into open space to the south east of the site"*

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[http://www.wiltshire.gov.uk/south\\_wiltshire\\_settlement\\_setting\\_assessment\\_2008\\_chapter\\_4\\_amesbury\\_bulford\\_and\\_durrington.pdf](http://www.wiltshire.gov.uk/south_wiltshire_settlement_setting_assessment_2008_chapter_4_amesbury_bulford_and_durrington.pdf)

<sup>2</sup> <https://cms.wiltshire.gov.uk/documents/s150436/PSCON11ATEPLandscapeAssessmentPart1.pdf>

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Although neither Conservation Area, Listed Buildings nor Tree Preservation Orders could be held as precluding development, they certainly require caution in design and often this results in lower density development, particularly in village locations. The assumed number of dwellings on this site (30 net) appears to have been extrapolated from the nearby new-build, whereas the actual achievable number when factoring in design requirements, could be significantly lower, adding to the requirement for allocations elsewhere, particularly at Amesbury.

#### **5.6 Is the site in an accessible location with good access to everyday facilities by a range of means of transport? Does the plan provide an adequate basis to address any areas of deficiency?**

Although Durrington is a fairly large settlement with a degree of local services, overall within the Amesbury CA, Amesbury itself is (naturally) the pre-eminent settlement of the Amesbury-Durrington-Bulford grouping of settlements. As such, in fulfilling Core Strategy housing development targets, it should be the first priority.

Paragraph 5.19 of the WCS refers to the following issues that require addressing during the plan period:

- 1st bullet point – the need for “*balanced growth focussed around Amesbury*”;
- 5th bullet point – “*the need to make Durrington and Bulford more self-contained. They will have more local services and facilities to meet their own needs, meaning that functionally these settlements are less reliant on Amesbury*”

The Inspector’s question strikes particular resonance with the latter bullet point. In it, the WCS implies that there is an aspiration to develop more local services and facilities. However, none are provided for in the WCS itself and there is no Neighbourhood Plan or other vehicle to provide any whilst, if anything, services are progressively depleting. As such, it is contradictory to allocate more housing at Durrington and not at Amesbury itself.

Amesbury is better placed to deliver residential development in a sustainable manner, since a diverse range of higher-order services, facilities, and economic opportunities are available in the town. These notably include:

- substantial areas of allocated employment land (Solstice Park and Boscombe Down), in comparison with none at either Durrington or Bulford
- substantial high street frontage with range of specialist shops as well as professional services including banks/building societies
- several major supermarkets (whereas Durrington and Bulford have only local convenience stores)
- major public library, police and fire stations, and greater range of schools
- greater range of locations accessible by public transport

### **Conclusion and remedy**

The allocation of the College land (site 3379) for residential-led development would contribute to the social, economic and environmental ‘dimensions’ of sustainability demanded by national and local planning policy, as acknowledged, at least in part, by the Council and much of its evidence base. The Council’s rationale for omitting the site is weak and not supported by evidence. The opportunity should, therefore, be taken in this Allocations Plan to proactively bring this site forward and resolve the shortfall in allocations in the Amesbury CA, whilst more closely aligning the distribution of allocations with the settlement hierarchy, and promoting a more sustainable pattern of development as required under the NPPF.