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Sent by email only to: idkemp@icloud.com

Dear Sir

WILTSHIRE HOUSING SITE ALLOCATIONS PLAN EXAMINATION

In accordance with the directions contained in the email from you dated 18th February, we are submitting this document as a Supplemental Submission to the document we sent to the Spatial Planning Department on 19th September 2017. We also wish to attend on 2nd April to address the Inspector. We own site 3410 in Durrington, which would probably now be classed as an 'omission site' as it was not allocated. However, given the circumstances surrounding the selection and deliverability of the selected sites, we consider it relevant to make representations as the Council has failed to meet many criteria set out in the MIQs.

This Supplemental Submission also addresses submissions by other parties or new matters, where information was not available at the time of the initial consultation in September 2017. Our submissions are as follows:

Site S98/3154

Site S98 was given planning consent for housing in 2006, yet no development has taken place. It is now proposed that site 3154 be added and these should be allocated for housing. Given the lack of development on this site over the last 13 years it is apparent that the site cannot be delivered for housing. Anecdotally, we are aware there are physical and cost constraints on this site which is why it has not been developed. It is apparent that the Council did not carry out proper research to assess deliverability and, had they, the site might not have been included. Issue 7 of the Inspector's MIQs addresses monitoring. We question whether the Council has a sufficiently robust policy in place as if it did, the site would not have been included,

based on past performance. Also, this site potentially fails the test in Issue 2.3 and Issue 5.8 of the MIQs, when assessing whether the components are 'justified and realistic'.

Therefore, whilst 'it makes up the numbers' we consider that reliance upon it to do so is ill founded and not borne out by the evidence. In short, the owners have had their chance and S98/3154, whilst possibly suitable, has failed to satisfy a need in the past and it should not be relied upon to do so in the future.

Site 3179

Site 3179 is for only 15 houses. It is a logical infill site as it has housing to the east and west and fronts onto the A3028 (Larkhill Road) to the north. The loss of agricultural land was regarded as acceptable in the allocation process, as was moving the 'settlement boundary' to include this land.

Whilst our site, 3410, is technically outside the settlement boundary as shown on the plan sent previously, the current use is very much within the settlement boundary. Furthermore, a housing/medical/open space use for site 3410 would be less of a change than for 3179, as 3410 would move from a recreation use as shown by the planning consents as opposed to agricultural use for 3179. We refer to this specifically in the context of Issue 6 of the Inspector's MIQs.

A further consideration is that 15 houses at site 3179 would be a very modest contribution to the housing stock and certainly fails to meet the required level.

Submission in September 2017 by Durrington Town Council

Durrington Town Council made a submission in September 2017. Whilst many comments were against any development, they also addressed the impact of Army rebasing and infrastructure.

The **Services** section specifically refers to a shortage of medical facilities. Durrington has only one doctor and no dentist. Site 3410 is of sufficient size to include a medical centre for an additional doctor's and dentist's practice. We would accept this as a reasonable condition as part of any allocation and it was referred to in our September 2017 submission. The allocated sites cannot offer this.

The ownership and existing use of site 3410

The site has been let to Durrington Town Council since 2005 on a flexible short term lease. Throughout the consultation process there has been no indication that the Planning Authority realise that the site is in private ownership and merely let short term. The site was not deemed suitable for housing for the reason that it is an open space under the 2011 Local Plan as shown in the table below, extracted from the Council's selection process.

Area of search: Amesbury, Bulford and Durrington												
											exclusionary criteria, so taken forward for further consideration	
3410	Land to the east of Netheravon Road, Durrington	61	Y								The site is allocated as open space by saved policy R10 of the Salisbury District Local Plan 2011.	Remove

The site is allocated as open space in The Salisbury District Plan 2011, but that is not how the site is used in practice, nor does that allocation follow planning consents given as outlined in our original submission. It is also used for events (eg fireworks night), a BMX track and there is the ancillary structure for this. Therefore, to exclude the site because of the misallocation in the Local Plan is ill founded and was not an appropriate reason to discount it. Significantly, no other material reason was given in the pre-application as to why the site should not be residential. The pre-application and the Council's response was included in our original submission.

The whole point of a 'call for sites' is to review matters and adapt to meet new demands. The purpose of a review is not to perpetuate a historical allocation from a Local Plan adopted in 2011 which emerged from a consultation process of over a decade ago. Therefore, the Council has failed to meet the criteria as outlined in Issue 4.1 and 4.1 of the MIQs.

Affordability of Housing

The affordability of housing is a national, regional and local issue that has been well publicised, so I will not expand on that in this submission. Much has been made of the returning army to Salisbury Plain from Germany and this has been referred to during the consultation process. Durrington Town Council is concerned about local people being able to buy homes locally (ref the Durrington Town Council section on Affordability).

The basics of supply and demand mean that a good supply of homes will keep prices down, a shortage increases them. Therefore, the allocation should err on the side of caution and earmark sites for homes, to ensure that allocations are met, bearing in mind that some developers landbank and some sites have other constraints, such as S98.

If there is demand, the homes will be built and the demand will be met. Therefore, sites such as 3410 should be allocated to meet the demand. Specifically, we also refer to Issue 2.4 which refers to the 'delivery of the minimum housing requirement'. To ensure delivery of the minimum there must be additional sites in case some are not delivered. Furthermore, at no point is it stated that having too many sites allocated is undesirable.

Comprehensive Site Planning

The SHLAA process has focussed on housing as it was, by definition, intended to do. However, housing allocation should not operate 'in a bubble'. Site 3410 provides an opportunity for a number of key issues to be addressed in Durrington in the long term. The site should be developed on a comprehensive basis to include a permanent public open space, a medical centre and housing. The natural boundaries of existing housing, access roads and the A345 mean that the uses could be laid out with each area having a suitable access from different sources. No other site in Durrington offers these possibilities. Furthermore, there has been no indication how a long term open space will be retained nor a permanent medical centre provided in Durrington apart from on this site.

Yours faithfully

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Director

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