

Wiltshire Local Plan Review Consultation

Downton Parish Council's response to the section entitled 'Empowering Rural Communities'.

Introduction.

Under the section 'Housing Requirements for Local Service Centre and Large Villages' the consultation document identifies the basis on which proposals have been put forward for housing allocations to meet the Government's identified need for more housing. Understandably these have been based on objective criteria which include the size of the settlement, the proximity to other settlements and the constraints that limit the settlement such as areas of outstanding natural beauty and other natural assets. What cannot be considered in such objective criteria setting is the experience and knowledge of local people living, working and making a community in each of these settings.

This response will provide that context and make the case for including in the criteria, and consequent decision making, the limitations specifically on Downton that should limit acceptance of more housing in the Plan period.

These are related to the following key considerations:

- Housing need
- Drainage problems
- Traffic and Parking
- Lack of employment opportunities
- Local health and school facilities
- Open Spaces and availability of Amenity land

Housing Need

Downton's Housing Needs Assessment is now out of date (2014) but indicated that the greatest need was for small homes, homes with one or two bedrooms, homes for rent and housing for people on lower incomes to be able to remain local. Wiltshire's 'Homes for Wiltshire' Register currently indicates that there is a waiting list for these types of homes in the Downton area. Unsurprisingly these are not the type of homes that developers wish to build and recent consultation with two large national developers have indicated that they would consider building a mix of different sized housing, with one indicating that they would be willing to listen to the Parish Council but their core product is 3-4 bed homes to provide greater return on development investment. The latest development, still being built, in Downton is of seventeen 3, 4 and 5 bed houses replacing a building that had been providing 11 single occupancy homes.

The consultation document asks: Do you think this approach is worth pursuing? This question is asked in respect of the potential to limit planning permission on extending small homes because of the tendency for new owners to want to remain and extend their properties, so reducing the overall supply of smaller homes. The likelihood of being able to adopt local planning limitations on a national policy is low despite the potential for Downton to answer yes to this question. It is clear that Downton is unlikely to benefit from major developers to meet their identified housing need and we do not believe that Wiltshire will be able to enforce such limits. The national developers in question have also both indicated that they would only contribute the local requirement for 30% affordable housing despite our housing need being for

such housing. The response to the question in the consultation document 'Do you agree there should be a target of 40% affordable homes on all new schemes of more than five dwellings in the rural area?' would therefore be 'Yes'.

Drainage Problems

Much of Downton is on the flood plain of the River Avon, with many of the potential land development sites being affected by flood water. There are significant impacts to the community from high levels of groundwater on a regular basis. In extreme cases, these can lead to property flooding but on a regular basis during a wet winter (3 significantly raised groundwater levels in the last 10 years (winter 07, 13 and 14) there are regular overflows from the sewers and surface water drainage system in many locations onto roads and pavements as a result of groundwater infiltration. This can also lead to large numbers of properties, including the Trafalgar School, being unable to use toilets, washing machines, baths etc with temporary toilets being erected outside resulting in public health and stress related issues. To alleviate some of the problems, Wessex Water have installed temporary pumps during periods of high groundwater to pump directly from the sewers to the River Avon as an emergency measure. The River Avon is a SSSI and SAC with strict controls on unregulated discharges. The frequency of use of temporary pumps is not considered to be justified as an "emergency measure" long term and other solutions have to be pursued while minimising further contributions to the problem through development. (Please see appendix for evidence of the problems experienced)

Traffic and parking

Downton is served by two through routes. The A338 north/south, Salisbury/ Fordingbridge road and the east/west B3080 route leading to and from Redlynch, the A36 Southampton road and the New Forest.

The A338 has a noticeable increase in traffic volume with problem areas in the form of a bend on entering the village from the south, two sets of traffic lights and a roundabout to the north. There are a number of roads entering/leaving the A338 servicing residential areas and the industrial estate as well as the junction of the B3080. Parking on this road is very restricted. New development on this road increases the problem. Questions must be asked about the ability of the A338 to take more traffic in its current form.

The B3080 forms the roads known as The Borough, High Street and Lode Hill. There are a number of roads leading off it servicing houses as well as the staggered cross roads leading north, Barford Lane and south, Moot lane. It is used extensively by traffic from within Downton and those seeking to move to/from the A36 and A338 routes.

The B3080 has buildings on both sides throughout its length in the village which is a conservation area. While mainly private houses there are a number of shops and commercial premises. The central area is a small square with a pub, supermarket and a number of shops. There is a single lane section known as 'the pinch point' and the road crosses over river courses via two bridges while in addition there are two significant bends and traffic lights on Lode Hill. There is a 7.5 ton weight limit imposed for environmental reasons relating to structural damage to property - there is no enforcement. There is also the issue of air quality at the pinch-point.

There must be serious questions asked about the ability of the B3080 to take any additional traffic. There is very little off road parking so parking for residents is on the road. The volume of traffic has noticeably increased over recent years to the extent that any journey east west requires repeated stops and pull ins to permit traffic to pass. There are a number of choke points and there are repeated traffic accidents on this road and while most are minor in recent years there have been several serious ones involving damage to property.

Consideration must be given to potential traffic increases along the A 338 and from the villages of Redlynch, and Woodfalls as well as the A36 and New Forest.

The B3080 cannot handle more traffic safely due to a combination of factors: existing and increasing volume of traffic, the width of the road, the need to park on the road, configuration of the road, potential pollution and risk of damage to properties.

Employment

The Wiltshire Core Strategy (2015-2026) aimed for “balanced growth of housing and employment” in the South Wiltshire community area in order to deliver sustainable communities. Downton, designated as a Local Service Centre, was earmarked as a focus for managed growth, and was allocated 190 new houses. This was based on the assumption that it provided “a good range of services” to serve the surrounding rural hinterland, and would show “improved” levels of local employment. Housing targets were met early in the plan period, but there has been no evidence since of new employment opportunities to justify further growth on these grounds.

The most recent employment statistics, collected for the Neighbourhood Plan, indicated that in the period 2014/16 there were about 1,000 jobs spread over the Downton parish area. However, of all the residents employed in the parish, 79% – ie a vast majority - worked **outside** the area. The pull of larger employment centres such as Salisbury (and to a lesser extent Southampton) is confirmed by Local Plan data showing residence based commuting flows from Downton being strongly and primarily to Salisbury.

The Wiltshire Community Plan (People Places and Priorities) states that “new jobs must be aligned to the delivery of new homes otherwise we are in danger of encouraging more commuting and congestion on roads”; and “only by delivering a range of job opportunities can young people in Wiltshire be retained and the long term development of the economy be supported”.

Jobs based in the Parish range from agricultural to professional; others are part-time and service related (retail, care sector and leisure/hospitality). Although the Downton Business Centre is said to be a principal employment hub, it has a large percentage of manufacturing, warehousing and distribution companies, which recruit widely and do not serve the immediate rural hinterland. It was notable from surveys that they employed only a small percentage of Downton residents (16%), and that the majority of jobs there were described as being “relatively low paid and low skilled. If housing is to be related to availability of jobs locally (and this would have to be determined by local survey) the need it is likely to be for small numbers of affordable or market entry homes.

Any prospect of economic growth over the past year has been negatively impacted by the Covid pandemic, and it is not yet possible to determine what the long term

effects on employment might be. At present, any significant growth seems unlikely – at least three businesses in the Downton Business Park will be closing or reducing staff numbers, and even before the pandemic, local retail job opportunities in the village had diminished (a loss in the last 10 years of a bank, 2 post offices, newsagent, general store, hairdresser, gift shop, bakery and pub). Small start-up businesses may take their place (a farm shop and flower shop have recently opened) but employment opportunities overall will remain limited, whilst working from home opportunities will continue to be affected by poor broadband speeds which are amongst the slowest in Wiltshire.

In the new Local Plan consultation, it is stated that Local Service Centre designations will not be changed, but WC needs to be realistic about the extent to which Downton “serves” a rural hinterland (all villages to the north and east see Salisbury as their primary service centre). If it cannot be said to have “a marked strategic role in sustaining jobs, services and facilities” it should not be asked to support the additional housing numbers proposed, certainly not before full housing needs and economic assessments are made.

Local health and school facilities

Facilities for children

Although Downton Preschool and Downton Primary school can both accommodate more children the primary school has already been extended by leasing a parcel of land from the Memorial Gardens which are owned by the Parish Council. An extension was built in order to accommodate children from the Persimmon development of 100 houses - there is no possibility of further extension to accommodate significant future housing developments. There is a shortage of registered child-minders with the nearest locally being in Lover or Alderbury and both areas have also been allocated new houses. Giant Steps Nursery are also currently operating a waiting list and will probably have only a few spaces by September. Morgans Vale School has the capacity for 120 children with currently 110 attending meaning that there would not be room for any overflow. The Secondary School, Trafalgar school, already takes almost three quarters of their children from outside of Downton.

Health provision

Both Downton Surgery and the Borough Dental practice consider that they would be able to extend their services to accommodate more housing but, in the case of the surgery would require additional funding for new building which would impact on the parking availability.

Open Spaces and Availability of Amenity Land

Downton is fortunate in its popularity as a tourist destination because of its proximity to the New Forest, but it is also a provider of open and green spaces for the residents.

The leisure centre is now under new management and pre-Covid-19 had a strong push for new membership; the associated football, bowls and tennis clubs are full of new ideas for youth participation, decoration improvements and new members.

The Moot, the Moot Lane Recreation Field (now much improved with a skate park and a BBQ area) and the Millennium Green can all be accessed by foot and car – small car parks are situated by the Millennium Green and the Moot. These open spaces are however quite a walk from the “bottom end” so therefore traffic via the B3080 could be increased to these amenities. Recent withdrawal of permission to

use the Longford Estate land for a bridge over the Avon to facilitate use of the facilities in the east of the village by those in the west, will further reduce opportunities to limit use of the B3080.

The Memorial Garden has had a chunk taken out for the new school extension to aid the attendance of pupils in the catchment area. As play space is limited in the Primary School the Memorial Gardens is used mostly by children using the play equipment or playing outside sports.

The field situated near the Bull public house is still shown on the Wiltshire Council interactive portal map but has been privately owned for some years and is not accessible to the public.

There are two allotment sites, the one in Barford Lane is owned and run by the Catholic Church and the Wick Lane site is leased to the Parish Council from the Longford Estate and run by a separate committee. The Wick Lane site has a waiting list due to the locality of the new housing nearby.

Downton Parish has a good selection of very popular footpaths, with a signed circular walk and a Heritage Trail. There is the famous route 66 which has the best access to the River Avon bank and links the Moot to the Millennium Green. However, Downton's proximity to the New Forest means that additional housing owners will want to use the Forest and will require mitigation measures to reduce the impact.

Conclusion

We conclude that, to answer the questions: 'What do you think to the housing requirements for Local Service Centres and Large Villages? Should requirements be higher or lower?' Downton Parish Council strongly makes the point that the allocation for Downton should be lower and, if any allocation is made, then permitting building under such allocation should only be at the end of the Plan period.

Very poor drainage, the need for housing that will be different to that likely to be provided by national developers, the impact on local amenities, the already very difficult parking and potentially dangerous traffic and the lack of relevant employment all make Downton unsuitable for a further allocation of what will effectively be 108 more homes.

Point 35 of the Consultation document states 'Many communities have taken up the opportunity to develop their own neighbourhood plans. The Local Plan must provide the number of additional homes each one must plan to accommodate. Downton is one of those areas that did 'take this opportunity' but is now in a position of having that Plan considered as 'out of date'. Downton and many other rural communities are already being put under pressure by developers who are aiming to submit planning applications even before the new Local Plan is drafted or "focused reviews" of existing Neighbourhood Plans can be created. Downton suggests that there should be a timed embargo on large scale speculative development, and that existing Neighbourhood Plans are given the maximum level of support within the legislation until a revised Downton Neighbourhood Plan review can be submitted or the Local Plan is finalised. Far from "Empowering" local communities, the current proposal leaves them unprotected in the interim period between the Wiltshire Core Strategy and a new Local Plan. Downton accepted the allocated figure of 190 houses in the Wiltshire Core Strategy and, during the last two years alone has absorbed and welcomed new people into the community in 100 new houses during the last two years and are still awaiting 17 more houses to accommodate new residents. Downton, as a community, needs time to assimilate new residents, allow community development and enable appropriate facilities to be welcoming. If a housing

allocation provides yet more housing in the early part of the Plan period, such community facilitation will be negative.