

Mr James Sutton
Spatial Planning South
Wiltshire Council
61 Wyndham Road
Salisbury
SP1 3AH

30 September 2009

Dear Mr Sutton

South Wiltshire Core Strategy - Proposed Submission Paper

Thank you for consulting South West Councils on the above document.

Under the 2004 Planning and Compulsory Purchase Act and accompanying Regulations the South West Strategic Leaders' Board (the executive arm of South West Councils), as the Regional Planning Body (RPB), has the role in assessing the general conformity of Local Development Framework (LDF) documents with the Regional Spatial Strategy (RSS). It has also the duty to respond to strategic planning applications and pre-application proposals and to assess if they would impinge on the delivery of the RSS. It also responds to consultation received from local authorities and developers on such issues (within the parameters set out in the Act and Regulations).

The current RSS is RPG10 but you will also be aware that the new RSS is being produced. The Examination in Public (EIP) of the draft RSS (dRSS) closed on 6 July 2007 and the Panel Report was published in January 2008. The evidence base behind the emerging RSS can be considered as a material consideration and will carry greater weight the closer to publication the RSS gets. The Secretary of State's Proposed Changes to the draft RSS were published on 22 July 2008 and public consultation closed on 24 October 2008.

The draft RSS is the RPB's agreed strategic planning position; however, the Proposed Changes clearly set the planning policy framework for the region. Although the RPB may not agree with some of the modifications made in the Proposed Changes, it is important to note that the Government's Proposed Changes now carry very significant weight as a material consideration, and must be taken into account when assessing LDDs and planning applications.

Comments

We find that the South Wiltshire Core Strategy Proposed Submission Paper is in general conformity with RPG10 and the emerging RSS. We support that the bulk of housing, employment and retail development will be concentrated at

Salisbury SSCT and in the Salisbury Travel to Work Area, which complies with respective regional policies in the emerging RSS.

We also support the identification of strategic sites to deliver housing and employment growth particularly in the first five years of the plan. We also welcome that the Council is committed to rigorously reviewing the process of bringing those sites forward. We have however some concerns about the provision of public transport over the plan period to deliver sustainable growth, and also about the structure and the content of the Integrated Delivery Plan.

Please find further comments below.

Transport

We note that initial modelling including partnership work with the Highways Agency has concluded that the transport network, with improvements, will be able to support levels of growth as planned for in the Core Strategy (page 56). But it is not clear as to whether South Wiltshire's public transport system is capable to support the level of growth proposed. The vision for South Wiltshire refers to an 'improved public transport system' (Salisbury Vision document (section 3, page 19)). The community area chapters only very broadly refer to public transport improvements. We suggest that the strategy should include diagrams showing the key transport arteries, strategic land allocations, and areas/routes where key public transport improvements are required. The Core Strategy also needs to be more specific how demand management and sustainable travel measures will be introduced at Salisbury SSCT, in line with emerging RSS Policy RTS2.

We note however that the Council is currently preparing a Transport Strategy, due to be published in December 2009. It will be absolutely critical that the key improvements and measures (and here not only in regard to public transport) identified in the Transport Strategy inform the Core Strategy and the Integrated Delivery Plan. Developers and other stakeholders will need to have a clear picture which transport measures will need to be funded and implemented to support development, i.e. on strategic sites, in order to factor associated costs into their investment plans.

Integrated Delivery Plan

It is not clear from the delivery plan how much money will be required to deliver essential infrastructure. Also, the delivery plan is only very general about when infrastructure and other development will have to be delivered.

Whilst we appreciate that developer contributions form an important part of the overall funding portfolio of schemes it is not clear as to whether this will be sufficient to support development. Also, it would have been useful had the Transport Strategy been published together with the Core Strategy Submission Paper. It is therefore not possible for us to appreciate if the measures identified in the Transport Strategy are appropriately aligned with the phasing of major development schemes.

I hope you find the above comments useful. Please do not hesitate to contact me should you have any questions.

Yours sincerely

Henning Totz
Senior Policy Officer
South West Councils
Phone: 01823 425275
Email: henning.totz@swcouncils.gov.uk