

**WILTSHIRE COUNCIL
LOCAL DEVELOPMENT FRAMEWORK
SOUTH WILTSHIRE CORE STRATEGY REVIEW
DEVELOPMENT PLAN DOCUMENT
INDEPENDENT EXAMINATION
ISSUE 1: CONFORMITY AND WEIGHT TO BE
AFFORDED TO RSS
ON BEHALF OF
PERSIMMON HOMES AND
THE WILTON ESTATE**

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Q1.1 Conformity and Weight to be afforded to RSS

What weight should be attached to the emerging Regional Strategy for the South West in preparing the Core Strategy?

- 1.1.1 Persimmon Homes and the Wilton Estate consider that only limited weight should be attached to the emerging Regional Strategy for the South West at the reconvened Examination and in preparing the South Wiltshire Core Strategy. It is noted that the Localism Bill is currently progressing through Parliament but at the time of Examination it will not have been enacted nor will it have become operative. In light of the Coalition Government's recent Planning for Growth¹ statement and other policy, Persimmon and the Wilton Estate consider that the South Wiltshire Core Strategy, revised as necessary following the Examination, should progress to adoption, without further delay, to achieve a timely and up-to-date Core Strategy and establish greater certainty and predictability for emerging development proposals in the former Salisbury district, as sought by PPS 1² and PPS12³.
- 1.1.2 The Regional Spatial Strategy for the South West⁴ was never finalised, unlike the South East Plan. Therefore, the Interim Regional Spatial Strategy for the South West⁵ (the former Regional Planning Guidance for the South West (RPG10)) currently remains part of the statutory Development Plan for South Wiltshire, thus should be considered at the Examination. Greater weight should be given to the policy requirements of the Interim Regional Strategy at the Examination relative to the emerging RSS.
- 1.1.3 Salisbury is identified as a candidate ODCG (Other Designated Centres for Growth) in RPG10 (para 3.14). Policies SS2 the Regional Development Strategy and SS7 Other Designated Centres for Growth are particularly relevant to Salisbury and South Wiltshire and the Examination. It is noted that the emerging RSS broadly reflects the policy framework established by the Interim RSS.

¹ Planning for Growth Statement (2011)

² PPS 1 Delivering Sustainable Development (2005) paras 8 & 9

³ PPS12 Local Spatial Planning (2008) para 4.55

⁴ Regional Spatial Strategy for the South West Proposed Changes (2008)

⁵ Regional Planning Guidance for the South West (2001)

- 1.1.4 Persimmon Homes and Wilton Estate also note and support the Council's intention, through the Focussed and Consequential Changes, to remove any reference to the Interim or Emerging Regional Strategy from the South Wiltshire Core Strategy. Therefore, it would be consistent for the Council and the Examination not to rely upon the Interim or emerging Regional Strategy alone to inform or justify the content of the Adopted South Wiltshire Core Strategy but to give greater weight to the locally derived evidence and the latest Government Household projections.
- 1.1.5 However, it is acknowledged that the emerging Regional Spatial Strategy for the South West reached a relatively advanced stage, prior to the formation of the Coalition Government in May 2010⁶, the subsequent Localism Bill⁷ and associated Ministerial Statements. Therefore, the Regional Spatial Strategy for the South West (Proposed Changes) (2008) should remain a material consideration for the South Wiltshire Core Strategy and the Examination, albeit that the weight attached to it should only be limited. The draft Regional Strategy was considered and tested at the Regional Examination in Public between April-July 2007. The EiP Panel reported in December 2007. The Secretary of State published his Proposed Changes to the Regional Spatial Strategy for the South West in July 2008. Amongst other things, these documents reinforce the importance of Salisbury in Wiltshire and the need for an urban focus at the city.
- 1.1.6 Persimmon Homes and the Wilton Estate note that the early stages of plan preparation for the South Wiltshire Core Strategy^{8,9}(formerly the Salisbury District Core Strategy), including the Pre-submission Draft South Wiltshire Core Strategy¹⁰, were prepared in general conformity, and in broad accordance, with the emerging RSS. The earlier hearing sessions were also conducted in the context of the emerging RSS and much of the debate expressed, at the time, remains relevant. Whilst the recent Focussed Changes propose a reduction of approximately 20% in the level of housing to be provided in South Wiltshire than previously proposed, during the plan period, much of the emerging Regional Strategy's underlying policy content remains relevant to the Examination and these general policy principles are reflected in the emerging South Wiltshire Core Strategy.

⁶ Coalition Programme for Government (2010)

⁷ Localism Bill

⁸ Preferred Options Document

⁹ Our Place in the Future

¹⁰ Pre-submission Draft South Wiltshire Core Strategy

- 1.1.7 Persimmon and The Wilton Estate consider that the emerging draft RSS (Proposed Changes) should not be afforded the same weight as other adopted Development Plan Documents. However, its content and the associated evidence base remains material to the South Wiltshire Core Strategy independent examination, having regard to Ministerial Statements and recent case law.
- 1.1.8 Aside from the proposed reduction in the overall number of jobs and dwellings, the Core Strategy, incorporating the proposed Focussed and Consequential Changes, retains many key elements of the emerging RSS. Thus it is open to the Inspector to assess whether or not the policies of the amended Core Strategy is sufficiently in accordance and general conformity with the emerging RSS, as a whole, without regarding this exercise as the most central and critical test of the South Wiltshire examination.
- 1.1.9 Persimmon and Wilton note that the emerging RSS (Proposed Changes) makes provision for 6,000 additional dwellings at Salisbury SSCT, compared to 6060 additional dwellings in the Salisbury and Wilton Community Area in the South Wiltshire Core Strategy. It was generally accepted that the large development sites in Wilton Parish, such as Fugglestone Red or UKLF, are intended to meet the needs of Salisbury itself.
- 1.1.10 In conclusion, Persimmon and the Wilton Estate consider that only limited weight should be attached to the emerging Regional Strategy, for the reasons set out above, at the Examination and in preparing this Core Strategy. It would be preferable to attach greater weight at the Examination to the locally derived evidence base and the interim Regional Strategy rather than rely on the emerging Regional Strategy or its evidence base to inform the content of the Core Strategy. Of more relevance to the South Wiltshire Core Strategy, and greater weight should be afforded to it, is the Government's 'Planning for Growth' initiative which, amongst other things, advises local planning authorities to press ahead, without delay, preparing up-to-date development plans and to use the opportunity to be proactive in driving and supporting the growth that the country needs. The Council have sought to do this, albeit based the reduced levels of homes and jobs. However, the current proposals will be monitored and can be adjusted, if required, through a subsequent review or partial review of the Core Strategy.

1.1.11 The Steve Quartermain letter to Chief Planners (6th July 2010) makes clear the expectation that local planning authorities will carry on delivering their LDF Core Strategies and the proposed revocation of regional strategies is not a signal for local planning authorities to stop making plans for their area. Therefore, to expedite the deliver of the South Wiltshire Core Strategy, taking account of recent case law, it is considered that weight should be given to the Interim RSS and less weight afforded to the emerging RSS at the Examination. However, it remains necessary and appropriate for the Inspector to consider the degree of general conformity between the South Wiltshire Core Strategy and both the interim and emerging Regional Strategies as part of the examination process.

Q1.2 Conformity and Weight to be afforded to RSS

Is the Core Strategy, in the form now proposed by the Council, generally consistent with the emerging Regional Strategy?

- 1.2.1 Despite the proposed reduction in the overall dwelling provision and the number of new jobs, Persimmon and the Wilton Estate consider that the draft South Wiltshire Core Strategy Review is generally consistent with the policy direction, as a whole, of the Interim¹¹ and Emerging Regional Strategy (2008)¹².
- 1.2.2 Given that the emerging Regional Strategy was never finalised and thus did not achieve full development plan status, Persimmon and the Wilton Estate, on this occasion and having regard to the somewhat unusual context and relative timing, consider that it is sufficient for the South Wiltshire Core Strategy to broadly reflect the content of the interim and emerging RSS. The document does not need to slavishly adhere to every requirement to be judged as being generally consistent with the Interim Regional Strategy or the emerging Regional Strategy, as a whole.
- 1.2.3 Persimmon and the Wilton Estate note that with the demise of the South West Regional Assembly/South West Councils and the Government Office for the South West. Therefore, the responsibility for assessing whether or not the Core Strategy is generally consistent with the Regional Strategy now lies with the Inspector.
- 1.2.4 Persimmon and the Wilton Estate are satisfied that the Draft Core Strategy is generally consistent with the Interim Regional Spatial Strategy for the South West (RPG10)¹³ and the adopted Wiltshire and Swindon Structure Plan 2016 (2006)¹⁴, which was prepared in accordance with RPG10. These statutory Development Plan Documents should carry more weight than the emerging Regional Strategy at the Examination.
- 1.2.5 The new style planning system will be largely based on a single plan and the National Planning Policy Framework. Given the South Wiltshire Core Strategy will have a relatively short shelf life, before it is merged with the rest of Wiltshire Core Strategy and subject to review, Persimmon and the Wilton Estate consider that it

¹¹ Regional Planning Guidance for the South West (2001)

¹² Regional Spatial Strategy for the South West (Proposed Changes) (2008)

¹³ Regional Planning Guidance for the South West (2001)

¹⁴ Wiltshire and Swindon Structure Plan 2016 (2006)

would be undesirable to prepare the South Wiltshire Core Strategy in precise accordance with the numerical requirements of the emerging Regional Strategy.

- 1.2.6 However, it is accepted that the evidence base, which informed the preparation of the emerging Regional Strategy, is a material consideration, together with other considerations, at the Examination.
- 1.2.7 As the urban focus on Salisbury is retained and the Core Strategy is seeking to expedite delivery of new homes, including affordable homes, and jobs in South Wiltshire, including at Salisbury, the Draft Core Strategy should be regarded and accepted as being generally consistent with the emerging Regional Strategy. Furthermore, this approach would reflect the aspirations of Planning for Growth. It is noted that the Government wish to see a swift return to economic growth and expect LPAs to plan positively for new development.
- 1.2.8 It is accepted that recent case law (Various Cala Homes decisions) has re-iterated the point that the Regional Strategies remain part of the planning policy framework until they are actually abolished. However, the locally derived evidence base, relied upon by the Council to underpin the South Wiltshire Core Strategy, is broadly consistent with the Interim and emerging Regional Strategy, sufficient to enable the South Wiltshire Core Strategy to proceed to adoption based on the locally derived evidence, particularly as this broadly reflects the latest Government Household Projections (PPS3 Para 33).
- 1.2.9 Persimmon and the Wilton Estate note that the re-issued PPS 3 Housing (June 2011)¹⁵ restates the Secretary of State's aim to achieve a 'Step Change' in housing delivery, through a new, more responsive approach to land supply at the local level (Para 2), the strategic housing policy objectives and planning for housing policy objectives are set out in paras 9 and 10.
- 1.2.10 It is acknowledged that the new PPS 3 retains many references to the Regional Spatial Strategies, however paras 32 and 33 are most pertinent to the Examination. In that the level of housing provision should be determined taking a strategic, evidence based approach that takes into account relevant local, sub-regional, regional and national policies and strategies achieved through widespread

¹⁵ Planning Policy Statement 3 Housing (June 2011)

collaboration with stakeholders. Para 33 goes on to set out what factors need to be taken into account in assessing and determining the appropriate level of housing. These do not solely relate to the emerging Regional Strategy.

1.2.11 The Coalition Government's Planning for Growth statement¹⁶ reiterates the Government's intention to return decision making on housing and planning to local councils and sets out the intention to radically reform the planning system.

1.2.12 The general approach of the emerging RSS is to focus growth at Salisbury (SSCT) and distribute the remaining growth to Amesbury, the other smaller towns and villages. This approach is consistent with the policies of Interim RSS10. The emerging Regional Strategy developed policies on sustainable development, climate change, affordable housing, economic development, transport and green infrastructure which have been taken forward by the South Wiltshire Core Strategy.

1.2.13 The document in its current form sufficiently addresses the policies of the emerging RSS, as relevant to South Wiltshire, without including or retaining the specific references to the RSS in the South Wiltshire Core Strategy.

1.2.14 Persimmon and the Wilton Estate note the advice set out in Para 4.33 of PPS 12 Local Spatial Planning¹⁷, in that the Core Strategy should be in *general conformity* with the Regional Spatial Strategy. However, the core strategy should focus on a delivery strategy to deal with the particular issues which have been identified as of local importance at Salisbury, such as the lack of affordable housing at the city.

1.2.15 Persimmon and the Wilton Estate consider that the Council have sought to do this through the revised Core Strategy, incorporating the Focussed and Consequential Changes.

1.2.16 In conclusion, Persimmon and the Wilton Estate consider that the South Wiltshire Core Strategy, in the form envisaged by the Council, is sufficiently in general conformity with the policies interim RSS and the emerging Regional Spatial Strategy, as a whole, not to warrant the Inspector or the Examination to conclude that the Core Strategy, in its current form, is not in general conformity with the RSS and thus precluding the plan from progressing to adoption. It is imperative that a timely and

¹⁶ Planning for Growth (2011)

¹⁷ PPS12 Local Spatial Planning (2008)

up-to-date development plan document is produced for South Wiltshire without further delay, to achieve greater certainty and predictability in future planning and development management decision making in South Wiltshire¹⁸¹⁹ and address the recognised shortfall of housing needs, including affordable housing at Salisbury and elsewhere in South Wiltshire.

¹⁸ PPS 1 Delivering Sustainable Development (2005) Para 8

¹⁹ PPS 12 Local Spatial Planning (2008) Para 4.55