

South Wiltshire Review: Core Strategy

Further representations from Catesby Property Group (Reps 29-32)

Matter 2 Evidence supporting revised Housing & Employment figures.

What evidence is there to support the revised housing and employment figures now being proposed by the Council? How robust is the evidence as compared to the evidence supporting the emerging Regional Strategy?

Introduction.

Catesby Property Group are the key investors and developers behind the Longhedge strategic site at Old Sarum north of Salisbury. Since we had not confirmed and concluded our interest in the site at the time of the previous Examination in January 2010, we were not formally represented at the previous Inquiry, although we did attend as observers. However, the landowner was ably represented at the previous EIP by their agents, SmithsGore. We have now indicated a wish to appear at the Examination in Public in August 2011 and therefore our submissions should be read in conjunction with those of Steven Briggs from SmithsGore.

The Previous RSS Evidence base.

The policies in the South West Regional Spatial Strategy were formulated as part of an iterative process incorporating the views of the various local authorities, including the (then) Salisbury District Council. The initial submission of SWRSS was in June 2006 and was based on the (then) current, but badly outdated, 1996 based household projections. Within weeks, the Government issued new 2003 based projections and local authorities were together invited to submit revised suggested figures. The original submission figures (or so-called Option 1 targets) are therefore irrelevant in this case.

Further figures based on the 2003 based projections were submitted in early 2007 and these formed the basis of the authorities' joint submission. They relied upon a Housing Market approach and were based on employment figures from Cambridge Econometrics. They were consistent and co-ordinated having taken into account the checks and balances both within and between regions, absorbing the ebbs and flows of inter and intra-regional migration between local authorities.

The Examination in Public was held during the summer of 2007 and the Panel issued its report in January 2008. This report recommended a target of 13,900 new jobs in the Salisbury journey to work area and some 12,400 new homes in the South Wiltshire area, of which 6000 were to be focused on Salisbury. This strategy was informed by the updated 2004 based household projections, which broadly endorsed the levels in the earlier 2003 based figures.

In June 2008, the Secretary of State issued his Proposed Modifications to the Regional Spatial Strategy which broadly endorsed the scale of development suggested by the Panel Report (insofar as Salisbury is concerned) and these were circulated for public consultation prior to adoption. However, partly as a result of the weight of objections (largely to the urban extension proposals elsewhere in the region) and partly due to concerns about Legal Challenges against the East of England RSS, the South West RSS was never formally adopted.

GOSW did however write to local authorities on at least two separate occasions (the latest in December 2009), emphasising the considerable weight which should be given to the Proposed Modifications and this was reflected in the position taken by Wiltshire Council when the South Wiltshire Core Strategy was subsequently debated at the SWCS Examination in February 2011.

The Council's Approach to the Review.

It is clear that the decision to review the SWCS was taken very soon after the original statement by Eric Pickles on 27th May 2010 and probably immediately after the subsequent revocation statement on 6th July 2010 – which urged local authorities to act quickly in taking decisions in any review.

The Council therefore embarked on re-assessing the evidence on housing and employment needs, insofar as it was able to, but took the decision to maintain the broad strategy within the Plan. At that time the Council could not have known that the Revocation of RSS's would be found to be unlawful. Indeed, as paragraph 5.2 of Topic Paper 20 explains, the decision taken to review the Core Strategy by the Council's Cabinet on 19th October 2010 was before the outcome of the Cala decision was known. In effect therefore, the Council was misled by the Ministerial Statements which in practice, have undermined the Council's position and resulted in a delay of at least 18 months to their Core Strategy, whatever the outcome from now onwards.

So what is the justification for the review? The reasons given within paragraph 3.1 of Topic Paper 20, refer obliquely to environmental constraints and local pressures forming the justification for the review. This effectively represents a volte face in the Council's approach – since (notwithstanding the comments in paragraph 5.4 of Topic Paper 20), these were not used as arguments for tempering the level of growth in the submitted Core Strategy. Indeed, paragraph 1.4 of the previous Topic Paper on Core Policy 1, Matter 1 (dated January 2010) dealing with the amount of development, stated, *'The review of the RSS cannot change the environmental constraints which apply to South Wiltshire. The strategy is based on meeting local needs in a locally constrained environment'*.

In any event, the previous Submitted Core Strategy was supported by Sustainability Appraisal which the Council. In fact, the level of development in the submitted plan was strongly defended by the Council as a means of supporting the growth ambitions of Salisbury, promoting retail development in the City and preventing South Wiltshire from becoming a dormitory area for larger towns elsewhere. The Council's Topic Paper on Matter 1 (January 2010) produced for the previous Examination indicates (in para 2.0) that Chapter 3 of the Core strategy on 'Tackling Local Needs' identifies a high need for housing and employment growth which broadly corresponds to the emerging RSS. It goes on *'If the Core Strategy were to be produced purely on local needs evidence, setting aside the RSS, that the growth needs would not significantly alter'*.

It is our view that the review methodology outlined in section 4 of Topic Paper 20, bears little relation to the original approach which was adopted in the Regional Strategy. Essentially this appears to be a 'home-grown' approach designed to reflect the subjective views of Council officers, councillors and consultees on the local environmental factors (which have already been considered) and to reflect comments on the plan (which have not been published and which are being considered outside the normal procedures of the Core Strategy process).

The Council's Revised Evidence Base

Neither Topic Paper 20, nor the Wiltshire Housing Requirements Technical Paper, submitted as Appendix 1 to the 22nd February 2001 Council meeting, provide a clear justification for a review in housing and employment numbers. Nor do they explain whether the work which has been undertaken extends beyond Wiltshire to look objectively at the implications of any changes on other Districts or Counties.

The approach for assessing the figures appears to derive from a County Wide analysis (excluding Swindon) and appears to link loosely back to the Council's Corporate Plan and Community Plan 2011-2026 and refers to a separate public consultation exercise conducted between September and December 2009 after the SWCS was submitted.

It is unclear whether account has been taken of adjoining authorities Core Strategy reviews (insofar as they are known) or whether this has formed part of any proper statistical analysis of need.

Wiltshire County has identified a range of housing of between 35,900-43,200 for Wiltshire (referred to with paragraph 5.5 of Topic Paper 20), although the origin of this figure is unknown. A similar range of 35,900-57,800 is determined for employment growth – based on what is *'demonstrated to be realistic and achievable given the spatial characteristics of Wiltshire'*. The maxima is then reduced to 43,200 – although the reasons for this is not explained, other than it appears to coincide with the needs arising from the projected population (42,900) – the derivation of this is also absent.

Paragraph 5.7 states *'a large amount of work has been undertaken to assess what proportion of the number of dwellings to support employment growth can realistically be achieved, given the constrained environment'*. This is clearly a subjective analysis which completely parts company from the earlier RSS methodology – using factors which are neither measured nor explained.

Paragraph 5.8 explains further how the methodology has been developed. *'The housing requirement for South Wiltshire should be in line with that which is considered to be deliverable, namely 8,900 to 10,600'*. No explanation is given as to how this range was determined. It is admitted that *'this does not meet projected employment growth but does seek to maximise growth within the constraints considered'*. However, once again the nature of these constraints are not properly spelled out, nor is it explained why the objectives of the strategy to promote growth have been tempered.

After adjustments for the military population, the range is then refined but then a subjective view is taken that *'it would be overly ambitious if this was towards the top of the range, as the delivery estimate is reliant upon societal changes'*. However, the nature of these societal changes are not made clear.

Paragraph 5.8 continues:- *'Rather a figure somewhere in the middle of this range is considered appropriate (9,900)*'. Why 9,900? Perhaps because it is just under 10,000??

The figure (9,900) is then justified by virtue of still being higher than the Structure Plan and higher too than historic build rates, although the Topic Paper on Core Policy 1 (January 2010) emphasised that the low historic build rate was due to a lack of available sites which was seen as hampering the growth of Salisbury.

It would appear that there is no sound and consistent justification for reducing the level of housing provision, still less determining the level of 9,900 dwellings, which in our view appears to have been identified in a completely arbitrary manner. The approach is unclear and subjective and fails to explain whether it is driven by housing needs, statistical requirements or (as now seems likely) by un-defined environmental constraints, nor is it clear how this reduced level of housing will interact with neighbouring authorities' Core Strategy proposals.

The revised employment targets would appear to be based on new Employment Projections, arising out of more pessimistic assumptions stemming from the recession. The explanation appears to relate primarily to the lack of early years growth in employment which was expected to occur. There is no doubt that economic activity will have been stifled by the recession (albeit the previous Examination was held some 18 months after the worst of the recession had occurred). However, the revised figures are difficult to interpret and explain and belie the intention of the Core Strategy, to create front-loaded economic growth and run completely counter to the Government's Plan for Growth objectives.

Planning is intended to promote, guide and control change, not to simply 'blow in the wind' depending upon the views of the most recent consultation exercise or focus group. The Core Strategy is intended to provide a long term strategy for investors, land owners and the general public, not to promote an incremental strategy dependent upon the most recent recession.

Conclusions

So which set of growth figures are more reliable?

The figures for housing and employment in the most recent SWRSS Proposed Changes, although becoming dated are still dependent on the most up to date statistical evidence available at the time and are generally sound and consistent. Indeed, until Wiltshire Council seized the opportunity to change them, they too were fully in support of the figures – with the possible exception of the additional 1000 dwellings added to the Salisbury area by the Panel report. The RSS proposals are based on evidence which has been debated in a public examination and emerges from the findings of an expert and independent Chairman. They hold together like a jigsaw, being based on housing market areas which overlay the District boundaries.

The revised SWCS proposals on the other hand are subjective and arbitrary without any clear statistical backing. Whilst there may appear to be a prima facie case for reviewing the figures downwards, to reflect declining levels of growth through the recession, it is not the purpose of planning simply to follow trends, but to determine policy and create strategies to deliver change and reflect a long term view.

It would be unrealistic in any event, to change the figure for South Wiltshire without assessing their impact thoroughly on adjacent areas and ensuring that the implications had been taken into account. We therefore consider that the revised housing and employment figures proposed by Wiltshire Council are fundamentally unsound.