

South Wiltshire Review: Core Strategy

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

Matter 3: Neighbouring Authorities.

Have neighbouring Local Planning Authorities been consulted on the revised housing and employment figures, and if so what was their response.

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 need for consistency and co-ordination.

It is essential that local authorities plan for housing in a long term, consistent and co-ordinated manner. Regional Spatial Strategies were a mechanism for viewing strategic housing and employment needs 'in the round' and taking into account the wider pressures for development, as opposed to simply examining local housing needs and tensions. Despite the doubts now hanging over RSS's, the need for consistency and co-ordination between authorities remains.

Whilst the present Coalition Government has clearly weakened this philosophy of strategic planning, through their commitment to the Localism Bill, as will be discussed in Matter 1, until the Localism Bill is enacted, Regional Strategies remain 'in play'.

Furthermore, one of the key areas of review within the Localism Bill (currently passing through the Lords) is the necessity to strengthen the strategic function of planning through a 'Duty to Co-operate'. There has been widespread feeling during the initial stages of the Bill, that the current proposals are inadequate and the Government is committed to making substantive amendments to ensure that Local Development Frameworks and plans are co-ordinated (across local authority boundaries) and above all that wider housing and employment needs are met.

The existing 'emerging' South West Regional Spatial Strategy is devised on the basis of Housing Market Areas, reflecting the need for cross-border planning within the south west region and this joint working is encouraged within PPS12.

Paragraph 4.16 of PPS12 states that 'Local authorities should explore and exploit opportunities for joint working on Core Strategies'.

Paragraph 4.17 continues by explaining that '*Many issues critical to spatial planning do not respect local planning authority boundaries. Housing markets and commuting catchments often cover larger areas which makes planning an individual district in isolation a difficult task, even where the RSS gives a strong steer.*'

This aspect will be covered more fully in Matter 4.

Have neighbouring authorities been consulted? What was their response?

This must inevitably be a question for Wiltshire County Council. Only the officers (and possibly members) can know what discussions have taken place with neighbouring authorities.

However it is clear from the text of Section 2 of the Council's Draft Housing Requirement Technical Paper produced in January 2011 (which does not appear to be part of the formal evidence base), that the Council has reviewed the actions of other local authorities in considering their own respective Local Development Framework Core Strategies. However, it is clear that this exercise was partly an effort to try and take into account other pressures on housing needs and demands, but also partly an attempt to seek comfort from the decisions of other authorities, by way of drawing a precedent for undertaking a downward review of housing provision. Essentially, it appears to have been an attempt to justify 'going with the crowd'.

In support of this statement, paragraph 2.15 of the Draft Housing Technical Paper states that *'It is clear that the majority of Local Planning Authorities that intend to undertake a review of future housing requirements are doing so with the intention to align economic forecasts, which take account of the economic downturn with future housing projections'.*

More specifically, the Draft Housing Requirements Technical paper went on to look at:

Swindon: where it is said that the Council are undertaking a re-appraisal of housing provision. Paragraph 2.22 states that, *'Prior to this re-appraisal the housing target for the Borough was 36,000 homes over the plan period. The Revised Pre-submission Draft document identifies a housing requirement over the plan period of approximately 25,000 additional homes, a significant reduction of some 12,000 homes.'*

Under the heading Impact on Wiltshire, the following paragraph 2.24 concluded that *'Any significant reduction in overall housing provision in Swindon will impact on the demand for housing beyond the boundary of Swindon, particularly in those locations with good access to the town. With a confirmed reduction of 12,000 homes, Wiltshire Council will need to work closely with Swindon Borough Council and be aware of any potential pressures ant reduction in housing at Swindon may place on Wiltshire's towns and villages which have an established functional relation with the Borough.'*

Bath & North East Somerset: where the Council are also undertaking a re-appraisal. They refer to a B&NES Draft Core Strategy which identifies the need to provide 11,000 new homes in the District. The report comments in Paragraph 2.26 that *'whilst this is a significant reduction (compared with 21,300 in the SWRSS proposed changes), the vast bulk of this, some 3,000 is the result of a removal of a planned urban extension for the south east of Bristol into the District. The Draft Core Strategy identifies a significant reduction of employment provision particularly around Bath.'*

Paragraph 2.27 under 'Impact on Wiltshire' then indicates that *'given the strong functional relationship between Wiltshire settlements and the B&NES District any reduction in housing provision may increase pressure on Wiltshire's housing stock'.*

Test Valley: where paragraph 2.28 of the report comments that the figures in the northern area have been reduced from 6,100 to 5,700.

Under the 'Impact on Wiltshire', paragraph 2.29 indicates that *'given the significant out-commuting to Andover from Wiltshire the reduction of development at Andover with need to be taken into account when identifying Wiltshire's future housing requirements.'*

Bristol: where in January 2011 (when the technical report was being prepared) it is said in paragraph 2.31 that the LDF was going through the examination process, a revised minimum target of 26,400 was being set with an aspirational 30,600 homes. Although not specifically stated, this is a reduction from 36,500 homes in the RSS proposed changes.

In paragraph 2.32, under 'Impact on Wiltshire' the report states that '*From an initial review, it is clear that Bristol is likely to see a very significant reduction in housing provision. This has implications for the entire sub-region and not just Wiltshire*'.

According to the Draft Wiltshire Housing Requirements report, at the time of its preparation (January 2011) some local authorities had decided to maintain their RSS housing targets at the level specified in the SWRSS Proposed Modifications.

In **Mendip**, discussions with officers apparently suggest that the figures are unlikely to change.

In **West Berkshire** where it is said that the West Berkshire Core Strategy was submitted to the SOS on 9th July 2010 for examination, only minor amendments of the submission document are expected to reflect the revocation of the RSS.

The conclusion of this section of the Council's draft Housing Requirements report indicated that:

- Wiltshire has significant net commuting outflows resulting from an imbalance between jobs and the resident workforce. This should be addressed through the delivery of appropriate levels of housing in combination with the delivery of appropriate employment opportunities,
- Those authorities with which Wiltshire experiences strong commuting flows are likely to reduce their housing targets from those proposed in the previous emerging policy (with the exception of Mendip and West Berkshire). As a result if Wiltshire was to maintain the targets proposed by the emerging RSS, it would cater for the sub-regional demand rather than that within Wiltshire. This would lead to an unsustainable increase in out-commuting flows, and
- Wiltshire nonetheless needs to ensure that it provides enough housing to cater for local needs supporting the local economy, rather than solely for long distance commuters.

Conclusions.

Whilst it is not clear whether any more recent investigations have been made, the conclusions arising from the Council's Draft Housing Requirements Technical Report (January 2011) are particularly telling. They appear to display a fear by Wiltshire Council that unless they 'follow the crowd' and throttle back their level of housing provision, they may find that they are absorbing the pressures from neighbouring authorities. Therefore one senses that against the background of pressures and decisions arising from their neighbours, Wiltshire Council decided that rather than try to meet their housing needs they would prefer to reduce housing provision in line with others.

This 'localist' (or rather parochial) sentiment, tends to reflect the philosophy which was evident immediately following the Secretary of State's 27th May 2010 announcement about revocation of RSS's. But it pre-dates the High Court decisions on the Cala case, which ruled that Regional Strategies are still part of the Development Plan and the more recent Plan for Growth statement in March 2011.

It is fair to say that more recent announcements have since shifted the emphasis towards encouraging authorities to meet their identified targets and to support recovery in the economy by providing more home and jobs. It will be important therefore to bring the information about neighbouring authorities up to date at the Examination.