

## **South Wiltshire Review: Core Strategy**

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

#### **Matter 4: Consistency with National Policy.**

*How consistent are these revised housing and employment figures with the aims of Government Policy as set out in 'Planning for Growth' and the objectives of the Core Strategy which include providing everyone with access to a decent, affordable home and delivering a thriving economy which provides a range of job opportunities to match a growing population?*

#### **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.

#### **Policy Background.**

Until the National Planning Policy Framework is published in its final form, the planning policy position remains in a state of flux. However, a draft of the NPPF document has now been published and it is clear that the initial 'anti-development' and 'localist' sentiments expressed in Eric Pickles' initial statements have now radically changed. Planning for Growth as a means of both assisting in the recovery of the British economy and ensuring that essential social and economic needs are met, is now regarded as being of paramount importance, rather than simply acceding to local pressures against development. These various policy statements are considered in more detail below.

It is important at the outset to therefore establish what forms the policy framework for the South Wiltshire Core Strategy:-

- National Policy as expressed in the Coalition Agreement and the subsequent 'Plan for Growth' issued jointly by the Treasury and Department of Business, Innovation & Skills, the 'Planning for Growth' statement and the associated and co-ordinated Ministerial Statements issued by George Osborne, Greg Clark, Eric Pickles and Grant Shapps,
- Detailed National Planning Policy advice contained in PPS's – until they are replaced by the overall National Planning Policy Framework (which has just been published in draft form and therefore will carry some weight in the examination discussion),
- Regional policy: in the form of the South West RSS (Proposed Changes).

As has been discussed in Matter 1, the Localism Bill contributes little weight to the debate at this stage, but in any event, it has since become clear that the Bill once it is enacted will not be an excuse for authorities to throttle back on meeting housing needs. On the contrary, the Government perceive the value of Localism in promoting additional development where it is needed.

## **Plan for Growth.**

The Plan for Growth, published in March 2011, arises out of the Budget Statement, delivered on 23<sup>rd</sup> March 2011 and conveys the Government's clear message that development needs to be promoted to assist and support the economic recovery by providing more homes and jobs. Paragraph 2.9 states that *'The Government is committed to ensuring that the planning system does everything it can to support growth'*.

Above all, the statement makes it clear that *'This statement of Government policy is capable of becoming a 'material consideration' in local planning decisions with immediate effect and local authorities should press ahead and put in place development plans that are pro-growth'*.

The Plan for Growth (page 49) repeats the Budget's key commitments in terms of Spatial Planning by highlighting and heralding, inter alia :-

- The need for local authorities and other bodies to prioritise growth and jobs,
- A Presumption in favour of sustainable development, where the default answer to development is 'Yes'.
- That more land should be made available for development in suitable and viable locations,
- The production of a shorter inherently pro-growth National Policy Framework,
- A commitment to applications being handled within 12 months,
- Fast tracking major infrastructure projects
- A duty on local authorities to co-operate on planning issues.

## **Ministerial Statements**

Unusually, a co-ordinated set of Ministerial statements was issued to synchronise with the 'Plan for Growth' report and these underline the importance of delivering growth in the economy and ensuring that plans provide sufficient homes and jobs.

Greg Clark's statement emphasises that the top priority in reforming the planning system is to promote sustainable economic growth and jobs. He referred to the impending National Planning Policy Statement which will expect local authorities to plan positively for development. *'Local authorities should therefore press ahead without delay in preparing up to date development plans and should be pro-active in driving and supporting the growth that this country needs. They should make every effort to identify and meet the housing , business and other development needs of their areas and respond positively to wider opportunities for growth'*.

Eric Pickles' statement referred to the need to revive the economy, unblock the planning system and boost house-building. He also drew attention to the scope which the house-building industry provides to create jobs.

Vince Cable and George Osborne made similarly positive statements supporting the need for more homes and jobs and the importance of reviving the economy.

These statements were supported by a letter sent by the Chief Planning Officer, Steve Quartermain to all local authorities, explaining that the Plan for Growth statement was a 'material consideration' in itself and publishing the statement by Greg Clark, as an Appendix to the letter.

The letter from Steve Quartermain is also accompanied by Appendix B which clarifies the Government's position on Planning Obligations and underlines the need for local authorities to review S106 agreements to ensure that they are consistent with the provisions of Circular 05/05 and with the new Community Infrastructure Levy regulations as well as ensuring that schemes are viable, to ensure that development can go ahead.

### Previous Pickles' Statement

The original 27<sup>th</sup> May 2010 statement by Eric Pickles, the Revocation Statement on 6<sup>th</sup> July 2010 and the subsequent DCLG statement following the Cala decision, all emphasise that it remains the Government's intention to abolish Regional Strategies. However, it is important to note that the Revocation Statement was accompanied by a comprehensive DCLG explanatory note (dated 6<sup>th</sup> July 2010) entitled '**Guidance for Local Planning Authorities following the Revocation of Regional Strategies**', which explained to local authorities what action should be taken.

This statement made it clear that

- The revocation (subsequently ruled to be unlawful) was not a signal for local authorities to stop making plans for their area. LA's may wish to review their plans following the revocation of RS's. We recommend reviews to be undertaken as quickly as possible. (point 5)
- authorities may decide to review and/or revise emerging policies in the light of the revocation of RS's. Where authorities decide to do so they will need to ensure they meet the requirements for soundness. (point 7).
- Local authorities will be responsible for establishing the right level of local housing provision in their area, but they can use housing figures from the existing or emerging RSS, (point 10),
- Local authorities should be able to justify housing targets and the process must be transparent. Authorities should use reliable evidence to justify their housing supply policies and defend them during the LDF examination process. (point 11),
- Authorities may base their figures on the original (so called Option 1 targets) submitted to the Regional Assemblies, supplemented by more recent information as appropriate, However any target will need to be tested at the Examination in public (Point 12).

The key message here is that any figures must be grounded on a firm and up to date evidence base.

### Conclusions.

The previous statement by Eric Pickles dated 27<sup>th</sup> May 2010, which triggered the review of the South Wiltshire Core Strategy has long since been overtaken by other more positive and up to date statements on planning policy. (The Revocation Statement on 6<sup>th</sup> July was in any event qualified by the Guidance note set out above by Steve Quartermain).

The Government's overall policy goal within PPS3 which emphasises the importance of ensuring that *'everyone has the opportunity of living in a decent homes which they can afford in a community where they wish to live'*, remains in force. This is reflected in the objectives within the South Wiltshire Core Strategy, but nevertheless the South Wiltshire Housing Market Assessment shows a greater rather than a reduced need for more housing. Paragraph 6.2 of the Council's Topic Paper indicates very clearly the '**The pressures have not changed**'.

However, It is clear from the Housing Requirement Technical Report and Topic Paper 20 that the Council cannot now demonstrate that they are aiming to satisfy peoples housing needs and indeed that the revised (lower) housing and employment targets which in our view are not consistent with the Government's new 'Planning for Growth' policy statement.