

**WILTSHIRE COUNCIL
LOCAL DEVELOPMENT FRAMEWORK
SOUTH WILTSHIRE CORE STRATEGY REVIEW
DEVELOPMENT PLAN DOCUMENT
INDEPENDENT EXAMINATION
ISSUE 4: CONSISTENCY WITH NATIONAL
POLICY
ON BEHALF OF
PERSIMMON HOMES AND
THE WILTON ESTATE**

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Q4.1 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?

- 4.1.1 Notwithstanding the differences between emerging RSS and the revised South Wiltshire Core Strategy, Persimmon Homes and the Wilton Estate consider that the revised housing and employment figures, set out in the emerging South Wiltshire Core Strategy, are sufficiently consistent with the aims of Government policy, as set out in Planning for Growth¹ 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, to enable the Core Strategy to progress to adoption.
- 4.1.2 It is noted that the Core Strategy will be subject to further monitoring and review, should the proposed levels of housing and employment growth be found to be inadequate then they can be readily increased at a future date by the local planning authority, having regard to the prevailing evidence and the period to be planned for.
- 4.1.3 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.

Planning for Growth

- 4.1.4 Persimmon Homes and the Wilton Estate note and support the aims of recent Government economic policy, as set out in Planning for Growth. It is essential that a thriving economy, which provides a range of job opportunities to match the growing population is achieved in South Wiltshire. An adopted South Wiltshire Core Strategy has a key role to play, during the remainder of the plan period, to help bring forward new employment land opportunities, to provide a positive planning framework for

¹ Planning for Growth (2011)

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

³ PPS12 Local Spatial Planning (2008) para 4.55

growth and maintaining the labour force in South Wiltshire, including encouraging labour mobility.

4.1.5 Policy HMA11 of the emerging Regional Spatial Strategy (Proposed Changes)⁴ seeks provision to be made for growth of about 13,900 jobs in South Wiltshire, of which about 13,500 jobs are to be provided in the Salisbury Travel to Work Area (TTWA). The emerging Core Strategy now seeks 10,400 jobs in the plan area over the period to 2026. This equates to a 25% reduction in the jobs target relative to the emerging Regional Strategy requirement. However, it is worth noting that the supporting text (para 4.3.15 & Policy SR30) and policy of the interim RSS10⁵ highlight that employment was expected to grow in the Salisbury TTWA by between 10,800 jobs and 13,600 jobs. Given the significant economic uncertainties during recession and economic slowdown/recovery, experienced in the first five years of the plan, it is not unreasonable for the Council to re-assess its jobs forecast for the remainder of the plan period.

4.1.6 Whilst the scale of the proposed employment figure, by itself, may be of potential cause for concern, it should be weighed against the benefits of employment delivery expected to come forward from the retained Strategic Sites and other employment allocations and elsewhere in South Wiltshire. It is noted the significant majority of the employment allocations in the emerging Core Strategy are retained at Salisbury. Furthermore, the proposed reduction in dwellings at Longhedge is not linked to a corresponding reduction in the amount of employment land to be provided at Longhedge. The emerging Core Strategy continues to include 28 hectares of employment land at Salisbury plus up to 40,000 sq m gross external area of retail and leisure floorspace.

4.1.7 The only significant change is the proposed Strategic Allocations (Core Policy 2) is the loss of 10 hectares of employment land at the South of Netherhampton Road site.

4.1.8 As previously stated at the Examination, planning for job growth is not a 'precise science' and should the 10,400 jobs figure be exceeded by 2026 in South Wiltshire, this would not be a 'bad' outcome for Salisbury. As any additional pressures would

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

⁵ Regional Planning Guidance for the South West (2001)

be felt at the latter end of the plan period, this issue could be easily addressed in a (partial) review of the Wiltshire Core Strategy, if required.

- 4.1.9 The proposed urban focus on Salisbury for housing and jobs accords with Policy SS2 of RPG10⁶, which seeks sustainable and balanced growth at settlements such as Salisbury to maintain and enhance the range of employment, housing and other facilities. The emerging Core Strategy proposals, as revised, seek to achieve this policy objective of Interim RSS10.
- 4.1.10 It is noted that not all new jobs in South Wiltshire will be created at the Strategic Urban Extensions. Thus, the relative adverse economic development impacts on the South Wiltshire plan area overall, associated with the loss of 10 hectares of employment land at Netherhampton Road, should **not** be over estimated or be afforded undue prominence at the South Wiltshire Examination.
- 4.1.11 The benefits of securing an up-to-date Core Strategy for South Wiltshire, which brings forward Strategic Urban Extensions to achieve a 'Step Change' in housing delivery at Salisbury, an increase in affordable housing where the need is greatest and new employment opportunities at the city offering the opportunity for future occupants to live and work locally, in Persimmon and the Wilton Estate's opinion outweigh the potential benefits that might accrue at Salisbury if the Netherhampton Road employment area is retained in the plan but the Council resolves to withdraw the South Wiltshire Core Strategy.
- 4.1.12 Persimmon and the Wilton Estate consider that the best and most expeditious and cost effective way to further the aims of Planning for Growth in South Wiltshire is to progress the Core Strategy to adoption without further delay. This would provide the necessary confidence and certainty to enable the Strategic Sites to be progressed to application stage.

Housing Objectives

- 4.1.13 Persimmon Homes and the Wilton Estate are disappointed, but not surprised, by the proposed reduction in the housing requirements. However, the issue facing this examination is whether the extent of the housing reductions are so significant to make the plan unsound, having regard to Planning for Growth and the objectives of

⁶ Regional Planning Guidance for the South West (2001)

the Core Strategy and PPS 3, regarding access to housing. Persimmon and the Wilton Estate do not consider the reduced level of housing, by itself, would make the plan unsound.

4.1.14 It is noted that the Focussed Changes seek to reduce the overall land to be provided for residential development from 12,400 dwellings, as required by RSS10 Policy HMA 11, to 9,900 dwellings during the plan period to 2026. This equates to a reduction of 20% across the South Wiltshire Housing Market Area. However, Policy HMA 11 makes provision for sustainable housing growth at Salisbury SSCT of at least 6,000 new homes during the plan period to 2026. The Focussed Changes combine the Salisbury and Wilton Community Areas, which is supported, to make a combined provision of 6,060 in the Salisbury and Wilton Community Area. Given the close functional and spatial relationship between the city and Salisbury, Persimmon and the Wilton Estate consider that the Revised South Wiltshire Core Strategy contains sufficient new housing development, directed at Salisbury and Wilton, for the plan to remain in general conformity with the emerging Regional Strategy. Furthermore, such a level of development at Salisbury is broadly in line with the evidence base for the emerging Regional Strategy and Policies SS2 and SS7 of RPG10⁷. Whilst the draft document has intentionally removed all reference to the RSS, the plan itself remains in general policy conformity with both the Interim Regional Strategy and the emerging Regional Strategy.

4.1.15 The main reductions in housing numbers are to be achieved through changes at Netherhampton Road, Longhedge and adjustments to the plan regarding Strategic Areas of Search around Salisbury.

4.1.16 However, the draft plan retains an urban focus on Salisbury, currently a Strategic Service Centre (SSC) in the Adopted Wiltshire and Swindon Structure Plan 2016⁸; a candidate Other Designated Centre for Growth (ODCG) in the Interim Regional Strategy⁹, a Strategically Significant City or Town (SSCT) in the emerging Regional Strategy¹⁰ and a Principal Settlement (PS) in the emerging Wiltshire Core Strategy¹¹, the city and environs has consistently been the location and focus for new

⁷ Regional Planning Guidance for the South West (2001)

⁸ Adopted Wiltshire and Swindon Structure Plan 2016 (2006)

⁹ Interim Regional Spatial Strategy (2001)

¹⁰ Regional Spatial Strategy (Proposed Changes) (2008)

¹¹ Wiltshire Core Strategy Consultation Draft (2011)

development. Salisbury is by far the largest settlement in South Wiltshire (and in Wiltshire) and the greatest housing needs arise at the city. Therefore, the consistent policy objective has been to secure additional sustainable development at Salisbury. The achievement of this goal will help increase access to a decent and affordable home at Salisbury.

4.1.17 As previously stated, the current Adopted Salisbury District Local Plan (2003)¹², which was prepared to cover the plan period 1991 – 2011, in general conformity with the adopted Wiltshire and Swindon Structure Plan 2011. It is noted that some existing Local Plan policies are ‘Saved’ until replaced by the South Wiltshire Core Strategy. However, the current plan is somewhat dated and the ‘Saved’ policies took several years to progress to final adoption. Therefore, they were formulated against a very different planning policy framework. Thus, it is important that the South Wiltshire Core Strategy be allowed to progress towards adoption as to do so would enable planning policies to be put in place which reflect the Government’s housing objectives, set out in PPS3 Housing (2011) and its predecessors.

4.1.18 At the previous Examination session on Affordable Housing and in the Council’s evidence base, including the South Wiltshire Strategic Housing Market Assessment, the Council made clear the extent of the affordable housing crisis facing South Wiltshire, including Salisbury. The Council’s strategy, amongst other things, seeks to provide decent, affordable homes at the proposed sustainable urban extensions. Therefore, this strategy will only come to fruition if the plan proceeds to adoption. If the plan is declared unsound or the Council resolved to withdraw the plan in response to a recommendation to reinstate one or other of the two key sites proposed for change, then the Council will not be able to secure the affordable housing at the strategic urban extensions proposed for retention.

4.1.19 Furthermore, as the proposed new housing would be delivered over a prolonged period, the impacts of the reduced dwellings numbers, in terms of the affordable housing secured, would be diluted and not fully felt until the latter part of the plan period, by which time it is reasonable to assume the Core Strategy would have been reviewed.

Sustainable Development and Climate Change

¹² Adopted Salisbury District Local Plan (2003)

4.1.20 The adoption of the South Wiltshire Core Strategy will bring forward new policies in the former Salisbury district, consistent with national and regional policy, which seek to ensure that the principles of sustainable construction are achieved in South Wiltshire and climate change becomes firmly embedded in the local planning for South Wiltshire.

PPS1 Delivering Sustainable Development

4.1.21 PPS 1 para 1, seeks to ensure that the right development, in the right place and at the time. Fundamental to this are the Core Strategies. Therefore, it is important that the Core Strategy is implemented without delay.

Conclusions

4.1.22 In conclusion, given the imperative to expedite the delivery of development and secure an up-to-date Core Strategy for South Wiltshire, in accordance with the Coalition Government's aspirations, as set out in Planning for Growth, Persimmon Homes and the Wilton Estate consider that the revised housing and employment figures, set out in the emerging South Wiltshire Core Strategy, are sufficiently consistent to enable the draft plan to be judged sound, by this Examination, 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.

4.1.23 The issue facing the Examination is whether the retention of one or more of the previously proposed allocations would make the draft plan significantly and materially more sound relative to Planning for Growth and the housing objectives. For the reasons set out above, Persimmon and the Wilton Estate consider that it would not. There remains a risk that the Council may not to adopt or withdraw the Core Strategy, given the local opposition to the Netherhampton Road, that thus delivery of much needed new development at Salisbury will be further impeded.