

MATTER 14. RELATIONSHIP TO OTHER DPDS

Question 14.1. The Wiltshire Core Strategy. *The Council intends to prepare a core strategy for the whole of Wiltshire. How would the south Wiltshire CS relate to this?*

Overview

1. The CS needs to be clearer about its relationship to the emerging Wiltshire CS by providing appropriate policy wording.

Statement

2. This position needs to be clarified by the Council, as the CS does not provide a clear description of how the South Wiltshire and Wiltshire CS relate. The exact same wording will be necessary if it is to be reconsulted upon.
3. Discussions with officers have confirmed that the intention is for the CS to be incorporated within the emerging Wiltshire Core Strategy. Its advanced stage in comparison to the rest of Wiltshire is to address the historic under provision for new housing in the plan area, which is consistent with the Salisbury Housing Market Area proposed in the draft RSS.
4. Similar to the concerns raised by the Government Office in their review of the Submission document, we have concerns that embedding the Core Strategy within the Wiltshire CS may re-open debate on the merits of strategic sites around Salisbury and other issues when it is examined. To ensure this does not happen, the CS needs to have appropriate policy wording which seeks to ensure it will be unnecessary to wholly review the strategy for South Wiltshire

Question 14.2. Site Specific Allocations DPD. *The Council intends to prepare a Site Allocations DPD. What policy context does the CS provide for this document? Does the CS strike the right balance between, on the one hand, making clear spatial choices about where development should go and, on the other avoiding being too prescriptive about the type and location of development?*

Overview

1. At present the CS is unclear with regard to the scope and framework of the Site Specific Allocations DPD. The CS needs a more systematic approach to distinguish the types of development including within this and other future DPDs.

Statement

2. A Site Specific Allocations DPD will serve a useful purpose in allocating non-strategic sites following the adoption of the Core Strategy. However, at present the policy context within the CS is somewhat unclear in determining what the Site Allocations DPD will broadly contain and leaves remaining unresolved and challenging matters into the hands of this future document. The Government Office shares this view in their comments on the Submission Draft stating that the DPD “*should not be used as a means to defer difficult decisions*”.
3. In essence, where the Council has not gathered robust evidence and research in relation to key matters, it shifts the focus to other DPDs. This approach is inappropriate and needs to be rectified to ensure that the CS appropriately promotes a framework which satisfies its strategic objectives.
4. PPS 12 explains that progress on the CS should not be held up by inclusion of non-strategic sites, but if it is necessary to allocate land which has not already been allocated in the CS, a DPD must be used (4.7). This Guidance also clearly asserts that strategic sites within Core Strategies should be those sites “*considered central to achievement of the strategy and where investment requires a long lead in*” (4.7). Usually those projects which have some civic value (such as the redevelopment of the MCCP) are those which will require a long lead in, and a collective effort to deliver.
5. The Core Strategy should therefore be concentrating on devising a delivery strategy to deal with the particular issues which have been identified of “*local importance*” (4.33) to South Wiltshire which require this collective approach. In contrast, the Site Allocations DPD whilst promoting sites which may satisfy the broader objectives of the CS, will be about bringing forward more developer lead projects.
6. Whilst there are numerous references within the evidence base to the issues of “*local importance*” and specific challenges facing South Wiltshire, these are ineffectively translated into the policy wording and associated text within the CS. Coincidentally, it is those matters which are central to the achievement of the strategy which need to be explicitly clear within the CS and not subsequent DPDs.
7. Chapter 6 of the CS provides an example of this approach in respect of what will be contained within the Site Specific Allocations DPD. Paragraph 6.27 considers that “*there may be retail capacity over the plan period beyond that that can be provided on the MCCP site*”. However, it acknowledges there is a “*level of uncertainty*” given the status of outstanding permissions and applications, concluding that retail needs “*will be assessed further during the subsequent Site Specific Allocations DPD*”. However, it is not for the Site Allocations DPD to assess the overall scale of capacity for such land uses.

8. Not only do we have concerns with regard to the over prescription and inflexibility with the mix of development being proposed on the MCCP in CP7, but we hold concerns about the soundness of the retail evidence base which provides the stated capacity for Salisbury and greater South Wiltshire. (We discussed this in more detail in our response to Matter 10).
9. The fundamental problem with this approach is that this “*uncertainty*” remains, and does not seek to positively respond to what is identified as a matter of “*local importance*” through the CS. With more robust evidence in relation to retail matters, additional retail capacity would have been likely to have been identified. This leaves an urgency that is left in abeyance until, as the Council currently propose, the Site Specific Allocations DPD is adopted or, perhaps until planning applications are determined. Clearly the CS should seek to address this through additional flexibility in policy, rather than putting matters on hold to subsequent DPDs. This approach does not accord with PPS4 which makes it clear that at the local level, the evidence base should “*identify any deficiencies in the provision of local convenience shopping and other facilities which serve peoples day-to-day needs*”. (EC1.3.c).
10. The Core Strategy needs to take the lead with guiding the scope of subsequent DPDs.