

**WILTSHIRE COUNCIL  
LOCAL DEVELOPMENT FRAMEWORK  
SOUTH WILTSHIRE CORE STRATEGY  
EXAMINATION IN PUBLIC**

**MATTER 14:  
RELATIONSHIP TO OTHER DPDs**

**ON BEHALF OF  
PERSIMMON HOMES AND  
THE WILTON ESTATE**

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### **Q14.1 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?*

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- 14.1.1 Persimmon Homes and the Wilton Estate generally support the South Wiltshire Core Strategy and note its overall soundness. However, further minor changes to the CS are sought to improve its effectiveness, consistency with national policy and for clarification/updating purposes.
- 14.1.2 Persimmon and Wilton note that the Council intends to prepare a Core Strategy for the whole of Wiltshire. The preliminary stages of plan preparation have commenced, including the recent consultation on the 'Wiltshire 2026 Planning for Wiltshire's Future' (October 2009)<sup>1</sup> document. The Council is at the Evidence Gathering stage for the Wiltshire Core Strategy.
- 14.1.3 Persimmon and Wilton support the goal of preparing a county-wide Core Strategy, at the earliest opportunity, to regularise the current interim transitional Development Plan arrangements.
- 14.1.4 Persimmon Homes are actively progressing development proposals elsewhere in Wiltshire through the new emerging Wiltshire-wide Core Strategy including the recent consultation on the "Wiltshire 2026" document.
- 14.1.5 The timescale for achieving the 'medium term' goal of full county-wide Development Plan coverage and the reasons for continuing with the preparation of the South Wiltshire Core Strategy should be considered having regard to the background context of Local Government Re-organisation. The relationship of the South Wiltshire CS to the Council's county-wide policy aspiration can be better understood by examining the background to Development Plan preparation in Wiltshire and the relative stages reached by the respective District LDFs, prior to April 2009.
- 14.1.6 Compared to progress made by the former Kennet, North Wiltshire and West Wiltshire Districts on their respective Local Development Frameworks, prior to Local Government Re-organisation (LGR), the former Salisbury District Council

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<sup>1</sup> Wiltshire 2026 Planning for Wiltshire's Future (2009) CPP/03

was significantly more advanced with the preparation of its LDF Core Strategy. As a consequence, the planning policy teams at the remaining districts worked collaboratively with Wiltshire County Council, prior to April 2009, on the Evidence Base to inform the emerging county-wide Core Strategy which would be published post LGR.

14.1.7 A comprehensive Evidence Base had been prepared by the former Salisbury District Council and its consultants and the emerging LDF Core Strategy was subject to extensive public consultation, prior to April 2009. The preparation of the Core Strategy was driven by many factors including the national policy requirement to maintain an up to date Development Plan, the need to address the significant affordable housing problems being experienced in the Salisbury HMA and to ensure an adequate supply of housing land is available in South Wiltshire.

14.1.8 Therefore, post LGR in April 2009 and the subsequent Wiltshire Council Elections in June 2009, the new Council resolved to continue to progress the former Salisbury LDF Core Strategy in advance of the Wiltshire-wide Core Strategy, in preference to deferring progress on the South Wiltshire Core Strategy to enable the rest of Wiltshire to “catch up”. This decision is supported by Persimmon and Wilton. The Wiltshire LDS – January 2009 confirms the preparation of the South Wiltshire Core Strategy.

14.1.9 It should be noted that the Adopted Salisbury District Local Plan<sup>2</sup> was adopted in June 2003. It covers the period to April 2011. It was prepared in accordance with the Wiltshire Structure Plan 2011<sup>3</sup>, adopted in January 2001. The Adopted Local Plan is the oldest ‘saved’ Local Plan in Wiltshire. The Kennet and West Wiltshire Local Plans were adopted in June 2004 and the North Wiltshire Local Plan was adopted in June 2006.

14.1.10 Therefore, the Local Plan elements of the Statutory Development Plan for Salisbury are now somewhat dated, being nearly seven years old, despite the majority being ‘saved’ by the Secretary of State. The actual formulation of the “saved” Local Plan policies themselves predates their eventual adoption by several years.

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<sup>2</sup> Salisbury District Local Plan (2003) LPP/01

<sup>3</sup> Wiltshire Structure Plan 2011 (2001) CPP/04

14.1.11 Persimmon and Wilton note that the higher level elements of the Statutory Development Plan have subsequently been revised considerably since the adoption of the Wiltshire Structure Plan 2011 in January 2001. The Regional Planning Guidance for the South West, RPG10<sup>4</sup>, now interim RSS10, was approved by the Secretary of State in September 2001. Furthermore, the Wiltshire and Swindon Structure Plan 2016<sup>5</sup>, which replaced the 2011 Structure Plan, was Adopted in April 2006. This extended the plan period to 2016. The emerging Regional Spatial Strategy, once finalised, will replace both the Adopted Wiltshire and Swindon Structure Plan 2016 and the interim RSS/RPG10. Therefore, it is essential that the 'saved' Salisbury Local Plan policies are replaced by a more up to date and appropriate policy framework as soon as practicable, prepared to reflect the latest national and strategic policy position and to identify the Strategic Allocations necessary to achieve the 'Step Change' in housing delivery sought by PPS3 and RSS10.

14.1.12 Thus given that 'Plan led' system is central to planning (PPS1 para 8<sup>6</sup>) and it is incumbent upon local planning authorities to maintain an up to date planning policy framework, the Council has rightly continued to progress certain aspects of the former Salisbury District CS with the intention of early adoption, ahead of the Wiltshire-wide CS.

14.1.13 However, it is self-evident from an inspection of the Submission Draft CS that it is significantly different to the Salisbury District Core Strategy Preferred Options (February 2008)<sup>7</sup>. The intentionally reduced extent of the Pre-submission Draft CS is to avoid prejudicing future potential policy formulation at a county-wide level which will be included in the Wiltshire-wide CS in due course. Thus, the South Wiltshire CS largely focuses upon the distribution of development between the respective Community Areas and the identification of the proposed Strategic Allocations, rather than development control matters.

14.1.14 Persimmon and Wilton consider that the early identification and assessment of the Strategic Allocations in South Wiltshire will enable planning applications to be prepared and submitted at a much earlier stage than would be the case if the

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<sup>4</sup> Regional Planning Guidance for the South West (2001) RPP/06

<sup>5</sup> Wiltshire and Swindon Structure Plan 2016 (2006) CPP/02

<sup>6</sup> PPS 1 Delivering Sustainable Development (2005) NPP/01 A

<sup>7</sup> Salisbury District Core Strategy Preferred Options (February 2008) CON/10

completion of the Wiltshire-wide Core Strategy had to be awaited, prior to submission of an application.

14.1.15 Figure 1 of the Core Strategy (Page 8) illustrates how the six South Wiltshire Community Area Spatial Strategies are intended to integrate with, and become part of, the Wiltshire-wide Core Strategy. It is noted that this is purely a short to medium term 'interim' position as the Wiltshire Core Strategy and any subsequent reviews will be prepared on a county-wide basis. This will 'harmonise' the Development Plan policy framework for Wiltshire in due course.

14.1.16 It is understood that once the Wiltshire-wide Core Strategy is adopted, it will supersede the South Wiltshire Core Strategy. A further minor change to Para 1.30 (See Appendix 1) may assist future plan users to better understand the relationship between the South Wiltshire Core Strategy and the Wiltshire-wide Core Strategy, during the interim period.

14.1.17 It is noted that the Government Office for the South West<sup>8</sup> seek further clarification on the matter. The Government Office supports the early preparation of the South Wiltshire Core Strategy. Its adoption ahead of the rest of the county responds quickly to the need to address historic under provision of new housing in the plan area, in readiness for economic recovery. The Government Office considers, on balance, it is appropriate to avoid unnecessary delay in plan preparation, in South Wiltshire, and continue to work on the CS to completion.

14.1.18 Given that the South Wiltshire CS will 'fall away' once superseded by the Wiltshire-wide CS, there will only be one Adopted CS in existence at any one time. Therefore, the scope for potential confusion amongst plan users will be limited and transitory.

## **Conclusions**

14.1.19 Persimmon and Wilton consider that the relationship between the South Wiltshire CS and the Wiltshire-wide Core Strategy is generally clear and appropriate, for an interim policy position. However, a suitably worded minor change to Para 1.30 (see Appendix 1) would assist future plan users to better understand the proposed relationship between the two Core Strategies and the

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<sup>8</sup> Government Office for the South West Letter 29<sup>th</sup> September 2009

intentions of the Council as to how precisely it intends to manage the integration of the South Wiltshire Core Strategy into the Wiltshire-wide Core Strategy document.

14.1.20 As the South Wiltshire CS specifically relates solely to the Salisbury Housing Market Area, identified by emerging RSS10 and has its own dwelling provisions for the Salisbury SSCT and Rest of District area, Persimmon and Wilton consider that it is appropriate for the South Wiltshire CS to set out the spatial strategy for the Salisbury HMA ahead of the Wiltshire-wide CS in the interim to expedite the delivery of development.

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## Q14.2 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?*

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14.2.1 Persimmon Homes and the Wilton Estate note that the Council intends to prepare a Site Allocations DPD. This document could be prepared on a Wiltshire-wide basis in due course.

### **What Policy Context does the CS provide for the Site Allocations DPD?**

14.2.2 The CS, in combination with the Adopted Wiltshire and Swindon Structure Plan 2016 (until superseded), RPG10 (until superseded) and emerging RSS10, provide the policy context for the preparation of the Site Allocations DPD. The scale of growth between the respective Community Areas and their settlements is informed by the CS. Similarly, the approach to affordable housing and other issues is covered by the CS. Clearly, the Site Allocations DPD does not solely rely on the Core Strategy to provide the policy context to guide and inform its content.

### **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?**

14.2.3 As stated elsewhere in response to Matter 9, there are some concerns regarding the apparent rigidity of the housing mix envisaged for each Community Area, including at the Salisbury SSCT. Thus Persimmon and Wilton consider that the Core Strategy potentially does not strike the right balance in terms of the degree of prescription contained in the document about the type and location of development.

14.2.4 One key role of the CS is to interpret the requirements of the emerging RSS and provide the local interpretation of how the development in the 'Rest of District' area is to be apportioned. The CS fulfils this role sufficiently to enable the more detailed work to be progressed through Core Policy 1, which sets out the

proposed distribution of housing and employment and Core Policies 3, 6, 10, 11, 14, 16 and 17.

14.2.5 Provided that the Core Strategy incorporates a degree of flexibility on the precise scale of growth and its dwelling mix for the respective community areas, Core Policies 1, 6 and the CS Community Area policies and targets would offer a reasonable and locally distinctive interpretation of RSS10 sufficient to inform the Site Allocations DPD without being too prescriptive about the type and location of development.

### **Conclusions**

14.2.6 Persimmon and Wilton consider that, subject to further minor changes, the CS, in conjunction with the available higher level policy guidance, would strike the right balance between making clear spatial choices about where development should go and avoid being too prescriptive about the types and location of development that would be appropriate in the respective Community Areas.

14.2.7 Given that the Wiltshire-wide Core Strategy will eventually contain generic development control policies, which would also apply in South Wiltshire, there is no requirement to include such policies in the South Wiltshire CS. In the interim period until replaced, any development proposals can be assessed relating to the South Wiltshire CS, the "Saved" Local Plan policies, the Creating Places SPG, and any relevant national and regional planning policy and guidance.

14.2.8 Persimmon and Wilton note that the revised Local Development Scheme will shed further light on the intentions of the Council regarding the Development Plan and Core Strategy for Wiltshire in due course.

## Appendix 1 Suggested Minor Change Alternative Wording for Paragraph 1.30

1.30 The first LDS for Wiltshire Council has been agreed with the Government Office for the South West ("GOSW"). This sets out the components and timetable for delivery of the LDF by the new authority. The content of the ***Adopted*** South Wiltshire Core Strategy will be incorporated into the ***Pre-Submission Draft*** Wiltshire Core Strategy ***following consultation on the policy framework for the remaining Community Areas and generic development control policies. It is not expected that the debate on the content of the South Wiltshire related policies and Strategic Allocations will need to be re-considered at the Wiltshire Core Strategy Examination in Public as the South Wiltshire Core Strategy will have already been subject to independent examination and testing. Figure 1 illustrates how the six South Wiltshire Community Areas will be integrated with the remaining Community Areas in Wiltshire. The South Wiltshire Core Strategy will be superseded upon the adoption of the Wiltshire Core Strategy.***

### Note

The suggested minor changes to Para 1.30 are shown in bold italics.