

MATTER 1. CORE POLICY 1. THE AMOUNT OF DEVELOPMENT

Question 1.1. Weight to be given to the Emerging RSS. *While the emerging RSS (The Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes – for Public Consultation July 2008.) has reached an advanced stage, it has yet to be finalised. What weight, therefore, should be given to the policies in the emerging RSS?*

Overview

Considerable weight should be given to the emerging RSS but the CS needs to be flexible in order to be able to respond to any further changes to it.

Statement

1. Paragraph 18 of PPS 1 explains that the weight attached to emerging DPDs “*depends upon the stage of preparation or review, increasing as successive stages are reached*”. It clarifies that where a DPD has been submitted for Examination but no representations have been made in respect of relevant policies, then “*considerable weight may be attached to those policies because of the strong possibility that they will be adopted*”.
2. Therefore, given that South West RSS has been through Examination in Public and Proposed Changes have been published, at least “*considerable weight*” should be placed on it.
3. Notwithstanding that it is the Government Office that is currently undertaking a review of the Sustainability Appraisal of the draft RSS to ensure that it is comprehensively robust, there would seem to be a strong possibility that it will be published in that form by the Secretary of State or that further changes will be modest. We do not, therefore, expect the outcome to radically question the quantum of development proposed for South Wiltshire. There must be a risk that some aspects of the growth strategy here might be modified.

Question 1.2. Amount of Development and the Emerging RSS. *In particular, is the South Wiltshire Core Strategy (the CS) correct to base its housing and employment growth figures on Policy HMA11 of the emerging RSS?*

Overview

The CS is correct to base its housing and employment growth on Policy HMA11 of the emerging RSS.

Statement

1. Bearing in mind the risk of modifications to the RSS emerging as a result of the GO's review and given that PPS12 emphasises the

importance of flexibility to deal with changing circumstances in devising a Core Strategy, it is relevant to consider the basic requirement that the CS should be “*consistent with national policy and in general conformity with the RSS*” (p 4.33). However, being in “*general conformity*” is not an excuse to depart from the final text of the RSS in terms of housing or employment numbers.

2. A potential difficulty here is that most of the housing and employment requirements of Policy HMA11 are proposed to be provided through the designation of Strategic Allocations. This inherently reduces the flexibility to respond to possible changes in the RSS.
3. This may also make it more likely that more frequent updating or review is required. In particular, PPS12 clarifies that “*The need for frequent updating may be reduced by taking a long-term view and providing some flexibility. So for, example, if a strategy has some room for manoeuvre, it should not need to be updated simply because there has been a change in the housing numbers in the regional spatial strategies.*” (4.14)
4. In this regard, should the review of the sustainability appraisal identify any matters which require a modification of housing, employment or other targets set by the draft RSS, this should be planned now to be achievable in a way that does not affect the general conformity of the CS to it.
5. Therefore, the CS should be sufficiently flexible and be able to show it can handle contingencies to be consistent with the emerging RSS. Flexibility will be needed in any event to deal with changing circumstances. It may therefore be appropriate to consider whether all proposed housing and employment Strategic Allocations are progressed as such in the CS or whether some could more appropriately be left for the subsequent Site Specific Allocations DPD.
6. However, in addition to housing and employment growth, the draft RSS draws specific attention to other components which influence Salisbury’s role and function as a SSCT. This approach is consistent with Policy EC1.2.a of PPS4 which requires evidence base at the regional level to “*be based on an understanding of the economic markets operating in and across the area*”.
7. The RSS Panel Report specifically identifies the need to “*enhance Salisbury’s economic performance*” (4.11.7) and “*revitalise its retail offer*” (4.11.8). Whilst it does not suggest quantitative targets, it directly supports the Salisbury Vision (4.11.9) which seeks to address these economic needs.
8. Therefore, the Panel Report’s support of the Salisbury Vision lends considerable weight to the specific areas for action identified within it, and directly supports PPS4’s objective to ensure that regional planning bodies and LPAs work together on such matters.

9. To ensure that the CS commands a more authoritative stance at the local level, it needs to provide flexibility to accommodate the appropriate amount of economic growth. In accordance with PPS4 (EC3.1.a) this flexibility will allow the ability to respond to changing economic circumstances, and more effectively deliver sustainable transport and other infrastructure needed to enhance Salisbury as a SSCT.
10. In particular, the draft RSS states that local planning authorities should *"seek to redress existing imbalances in the provision of facilities and services, to improve a centre's 'offer' relative to its role and function and help to bring forward more sustainable patterns of use"* (paragraph 8.4.13).
11. Our representations to the Submission Draft identify that Salisbury suffers from the leakage of retail trade to competing centres such as Southampton and Bournemouth. Overcoming this threat (which is acknowledged in the GVA Grimley Retail and Leisure Needs Study (October 2006) and also specifically at paragraph 5.8(c) of the Core Strategy) is central to Salisbury enhancing its role as a Strategically Significant City. This *"competitive"* relationship with other large towns (5.10) should therefore be clarified.
12. Whilst Salisbury currently performs a strong service role for its wider hinterland and is largely self-contained in terms of its jobs and housing, its distinctive location and lack of recent investment calls out for substantial new retail and related investment to continue to support its surrounding catchment area and maintain its strategic role within the region.
13. The GVA Grimley Study reinforces the point that Salisbury is a strong tourist and visitor destination which means that it is distinguishable from many other settlements within the South-West. In this regard, paragraph 35 of the Study highlights the importance of maintaining Salisbury's position as a *"higher order centre"* by needing to *"bring forward development proposals to stimulate demand from higher order, mainstream and quality comparison goods retailers to fill the gaps in provision"*.
14. In summary, the role and function of Salisbury in a retail sense is that of a sub-regional centre focusing primarily on comparison goods retailing, the provision of services and administrative functions. There is a clear need to modernise and improve its *"High Street"* shopping role.
15. The Salisbury Vision was therefore conceived within the context of the abovementioned challenges which were specifically local to South Wiltshire. However, the manner in which the CS ties in its specific *"Vision Projects"* is unclear, and we feel that what has been translated from it into the CS is not the most effective and deliverable approach to achieving the Vision here. We do, however, feel there is scope within

the policies to make it sound.

16. Core Strategies relate to specific areas, and in particular the Salisbury Vision has emerged from area specific challenges which affect Salisbury. In particular, the underlying reasons for preparing the strategy were driven by something needed to be done to “*maintain its position as one of the south west’s premier centres for business, tourism and retail*”. (pg8).
17. The original work for the Vision focused on four “*key areas*” that the Council identified to be a priority, including the MCCP, Southampton Road, The Market Place/Guildhall Square and Churchfields Industrial Estate”. Based on initial consultation, it was agreed that the “*Step Change*” option, which focused on major changes aimed at enhancing the City’s environment, improving the overall shopping experience, providing additional jobs and housing, would be pursued and translated into a masterplan for Salisbury.
18. To help achieve the Vision, it developed three overall strategies being development, transport and movement, and public realm. The main priority of the development strategy of the Vision is to “*significantly improve the city’s position as a shopping and business centre*” with the MCCP, Southampton Road and Churchfields Industrial Estate identified for “*major development*” (pg20). Therefore, to achieve the appropriate step-change required to enhance Salisbury’s position, it is therefore these projects which the Council need to provide policy emphasis on within the CS.
19. Therefore, within the context of the observations made within the RSS and the Panel Report which accompanies it, we consider that the current wording in the CS fails to translate this into the appropriate policy wording within the CS.
20. In particular, we raise concern that the CS does not provide appropriate wording with regard to Southampton Road, and Core Policy 7 requires more flexibility to ensure that it does not unduly restrict retail development above and beyond the scope of MCCP. We note that aspects of these matters are discussed in subsequent hearing statements, but we feel that it needs to be raised now in the discussion of the CS’s relationship to the draft RSS.

Question 1.3. Employment Land. *The CS acknowledges that there is a large oversupply of employment land in the area (paragraph 5.46 (f)). Why, therefore is it proposed to make provision for a further 13,900 jobs over the period to 2026?*

Overview

Some existing sites are poorly located to meet the need for jobs growth, and a significant proportion of new jobs will not be located on employment land.

Statement

1. It is relevant to note that the Panel Report to the RSS identifies that there is a “*small shortfall of employment land [within Salisbury], which is likely to bear mostly on office provision in Salisbury itself. Nonetheless, given the inherent uncertainties in translating job numbers into employment land requirements, the Panel regards provision for jobs growth of not less than 13,500 in the TTWA as a whole to be achievable, while maintaining a principle focus on the SSCT.*” (4.11.14)
2. The issue of oversupply relates in part to the available land being located in less attractive areas for economic development (see for instance paragraph 5.46 of the CS). It is also important to recognise that jobs growth is not limited to the availability of employment land. Health services, education and retail uses are significant generators of jobs found particularly in the larger centres.
3. Up to date and relevant plans are essential if the development needs and vision for South Wiltshire are to be met. It has been common practice, in many local plans, to carry forward undeveloped allocated sites for the previous plan period without appraising their current ‘fitness for purpose’. In some areas this has resulted in local plans which identify numerous employment sites, some of which will never be developed or returned to employment use since they do not match existing or foreseeable market requirements or are subject to severe physical or institutional constraints on their development.