

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

**MATTER 1 : CORE POLICY 1
THE AMOUNT OF DEVELOPMENT**

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

Pegasus Planning Group
Querns Business Centre
Whitworth Road
Cirencester
Gloucestershire
GL7 1RT

Telephone: (01285) 641717 Facsimile: (01285) 642348

PPG Ref: CIR.P.0264

Date: 5th February 2010

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of **Pegasus Planning Group LLP**



Q1.1 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?

- 1.1.1 Persimmon and Wilton 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.
- 1.1.2 Persimmon Homes and the Wilton Estate consider that considerable weight should be given to the policies in the emerging RSS.
- 1.1.3 PPS 1 Para 7¹ notes that together regional spatial strategies and local development frameworks provide the framework for planning for sustainable development. Para 8 affirms that the 'Plan led' system, and the certainty and predictability it aims to provide, is central to planning and plays a key role in integrating sustainable objectives. Para 14 of the General Principles Statement² notes that emerging policies, in the form of draft policy statements and guidance, can be regarded as material considerations, depending on context.
- 1.1.4 PPS3 Para 2³ seeks a 'Step Change' in housing delivery, through a new, more responsive approach to land supply at the local level. Para 32 states the level of housing provision should be determined taking a strategic, evidence based approach that takes into account relevant local, sub-regional, regional and national policies and strategies achieved through widespread collaboration with stakeholders. Para 33 lists the factors which should be taken into account which, amongst other things, include the Government's latest published household projections, local and sub-regional evidence of need and demand for housing and affordability. Para 52 confirms the Government's objective is to ensure that the planning system delivers a flexible and responsive supply of land. Para 53 states that LPAs should set out in LDDs their policies and strategies for delivering the level of housing provision,

¹ PPS 1 Delivering Sustainable Development (2005) Para 7 & 8 NPP/01 A

² General Principles Statement (2005) Para 14 NPP/01 C

³ PPS 3 Housing (2006) Paras 2, 32, 33, 52 & 53 NPP/03

including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption, taking account of the level of housing provision set out in the Regional Spatial Strategy. A key point to note is that PPS 3 Para 53 specifically states:

“In circumstances where Regional Spatial Strategies are in development, or subject to review, Local Planning Authorities should also have regard to the level of housing provision as proposed in the relevant emerging Regional Spatial Strategies”.

- 1.1.5 PPS12⁴ Para 3.1 reiterates that the RSS provides the overall spatial vision for the region and identifies the housing numbers to be provided. Furthermore, Para 4.1 states that the Core Strategy should set out how much development is intended to happen where, when and by what means it will be delivered. Paras 4.33 and 4.50 note the legal requirement that Core Strategies should be in general conformity with the Regional Spatial Strategy. The Regional Planning Body (South West Councils) confirmed in a letter dated 30th September 2009⁵ that the CS is general conformity with RPG10 and emerging RSS10.
- 1.1.6 Furthermore, Persimmon and Wilton note that the Government Office for the South West (GOSW) advises that there is no need for the RSS to be issued before progress on Core Strategies can be made.⁶ This point is reinforced specifically in respect of South Wiltshire in the GOSW response to the Pre-Submission Draft Core Strategy.⁷ The Government Office welcomes the timely progress on the Core Strategy, which has been published in advance of the Secretary of State issuing the final version of the Regional Spatial Strategy (RSS). GOSW state that considerable weight can be attached to the contents of the Secretary of State’s Proposed Changes to the RSS given the late stage it has now reached in its preparation. The Core Strategy is consistent with the emerging RSS and would appear sufficiently flexible to accommodate moderate changes to the RSS, should these occur.

⁴ PPS 12 Local Spatial Planning (2008) Paras 3.1, 4.1, 4.33 and 4.50 NPP/12 A

⁵ South West Councils Letter 30th September 2009

⁶ GOSW Letter to All Chief Executives 21 December 2009

⁷ GOSW Letter to Wiltshire Council 29th September 2009

Conclusions

1.1.7 Despite the fact that RSS10 has yet to be finalised, the document has reached an advanced stage. Therefore, Persimmon Homes and the Wilton Estate consider that considerable weight should be given by the Inspector and participants at the Examination in Public to the policies in the emerging RSS in accordance with national policy, in particular PPS3 Para 53.

Q1.2 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?

- 1.2.1 Having established that considerable weight should be given to the emerging RSS, Persimmon Homes and the Wilton Estate consider that the South Wiltshire Core Strategy is correct to base its housing and employment growth figures on Policy HMA11 of emerging RSS10, in accordance with the advice set out in PPS12 Paras 4.33 and 4.50.⁸
- 1.2.2 RSS10 Proposed Changes (July 2008) Policy HMA11 states provision will be made for growth of "at least 12,400" dwellings of which "at least 6,000" new homes should be at the Salisbury SSCT during the period April 2006 - March 2026 (see Summary Table 1). By April 2010 four years will have elapsed. The most recent housing monitoring data (April 2009) indicates that since April 2006 1318 additional dwellings had been completed in the Salisbury HMA. 437 dwellings at Salisbury and 881 in the Rest of District Area. Therefore, Persimmon and Wilton consider that provision should be made in the Core Strategy for at least a further 11,082 dwellings for the period to April 2026. At least 5,563 dwellings should be delivered at the Salisbury SSCT and at least 5,519 dwellings should be delivered in the Rest of District area.
- 1.2.3 Policy HMA11 states that provision will be made for the growth of about 13,900 jobs. It is acknowledged that not all new jobs will be provided at new employment developments. Many jobs will be created at the extensive existing employment areas and in the service and public sectors (PPS4 Para 4)⁹. Furthermore, there will inevitably be some job losses during the plan period throughout the Salisbury and Shaftesbury/Blandford Forum TTWAs, particularly during the recession and future economic cycles. Therefore, it is important that a robust supply of employment land is identified in the CS to aid economic recovery.
- 1.2.4 PPS 12 Para 4.50 states that Core Strategies should be prepared in general conformity with the emerging RSS. Therefore, Persimmon and Wilton believe it is correct that the CS should base its housing and employment growth figures on Policy

⁸ PPS 12 Local Spatial Planning (2008) Paras 4.33 and 4.50 NPP12 A

⁹ PPS 4 Planning for Sustainable Economic Growth (2009) Para 4 NPP/04

HMA11 (see Summary Table 2). This equates to 300 dwellings per annum at the Salisbury SSCT and 320 dwellings per annum to the Rest of District Area.

- 1.2.5 To gain an appreciation of why it is correct for the CS to base its housing growth in the RSS Policy HMA11, the relative scale of development being proposed for the South Wiltshire (Formerly Salisbury) Housing Market Area should be examined. It is informative to compare the current level of growth set out in the RSS10 Proposed Changes with previous Structure Plan requirements, the latest ONS Household Projections and the reasons underlying the proposed level of growth. (See Summary Table 3)
- 1.2.6 The City of Salisbury has been the focus for growth in South Wiltshire in successive development plans. It is identified as a Strategic Service Centre (SSC) in Policy DP3 in the Adopted Wiltshire and Swindon Structure Plan 2016¹⁰, which reflects the spatial strategy set out in RPG10/Interim RSS10¹¹. Policy DP4 makes provision for 8,000 net additional dwellings for the period to 2016, including 3,900 at Salisbury SSC. This equates to 195 dwellings per annum at Salisbury SSC and 205 dwellings per annum in the Rest of District Area.
- 1.2.7 The Deposit Draft RSS stated that the provision in the Salisbury HMA should be increased for the plan period 2006 – 2026 to 9,200 net additional dwellings, of which 5,000 were to be provided at Salisbury SSCT and 4,200 in the Rest of District area. This equates to 250 dwellings per annum at Salisbury SSCT and 210 dwellings per annum in the Rest of District Area. The Draft RSS noted that the Cathedral City of Salisbury (population 43,000) is a large free standing employment centre, performing a traditional service role for a wider hinterland of smaller towns and villages. It required the LDF to plan to enable Salisbury to continue to grow and prosper within the constraint of maintaining the integrity of environmental assets and avoiding flood risk areas.
- 1.2.8 The scale of development to be provided at Salisbury SSCT and in the wider Salisbury HMA was subject to independent scrutiny through the RSS Examination in Public, under Matter 4/11.

¹⁰ Wiltshire and Swindon Structure Plan 2016 (2006)CPP/02

¹¹ Regional Planning Guidance for the South West (2001) RPP/06

- 1.2.9 The Draft RSS EIP Panel's Report¹² Paras 4.11.15 – 4.11.19 set out the Panel's reasoning for recommending the level of growth for the Salisbury Housing Market Area and Salisbury SSCT. The Panel's recommendations were subsequently accepted by the Secretary of State in the RSS Proposed Changes¹³.
- 1.2.10 The Panel noted that the DCLG 2003 based household projections indicated that about 12,440 households would arise at the Salisbury Housing Market Area. The Panel was also aware that the Salisbury area is an attractive location both for retirement and economic streams of migration. The Panel highlighted locally generated growth derived from "household fission" and from retirement migration. Furthermore, the Panel noted that increased provision of affordable housing was needed at Salisbury. The Panel considered that the available evidence pointed towards a need for greater housing provision in the Salisbury HMA. They stated the 2003 based target should be aimed at delivering the 'Step Change' in housing sought by PPS3.
- 1.2.11 It is noted that the latest (2006 Based) household projections indicate a reduction in households formation, below the levels forecast in the 2003 and 2004 based projections, from 12,440 to 9,000 households. However, the local evidence of housing need and affordability set out in the DCA study¹⁴ (see Summary Tables 4 & 5) support the case for planning for the level of development proposed, also taking account of allowances for second homes, vacant dwellings and demolitions.
- 1.2.12 In terms of employment, Policy HMA11 seeks provision to accommodate about 13,500 jobs in the Salisbury TTWA and a further 400 jobs in the South Wiltshire part of the Shaftesbury and Blandford Forum TTWA. and the provision of 37 ha of employment land. This compares with 80 ha identified in the Adopted Structure Plan of which 35 ha were expected at Salisbury. The derivation of figure of 37 ha, figure is explained in the Panel's Report Para 4.11.14¹⁵. The Panel's Report confirms that the principal focus should be on the Salisbury SSCT. However, the Panel acknowledges that Amesbury would need to maintain a continuing supporting role.

¹² Deposit Draft Regional Spatial Strategy for the South West (2006) RPP/07

¹³ RSS10 EIP Panel's Report (2007) Paras 4.11.15 – 4.11.19 RPP/08

¹⁴ Draft Regional Spatial Strategy for the South West Proposed Changes (200) RPP/02

¹⁵ DCA Local Housing Needs and Market Survey (2006) STU/03

- 1.2.13 The consideration of the appropriateness of the housing and employment growth figures, set out in Policy HMA11, should also take account of the potential social and economic consequences and implications of failing to plan for this level of development in the Salisbury Housing Market Area.
- 1.2.14 The reasons underpinning the “Step Change” in housing delivery sought by PPS3 can be traced back to the Barker Review¹⁶ and other evidence¹⁷.
- 1.2.15 A constrained housing supply in the Salisbury HMA would add further pressure on house prices, affordability and the supply of affordable housing particularly in the Salisbury area. It would potentially restrict economic recovery by restricting labour supply and labour mobility through the inability of the potential economic immigrants to find suitable affordable accommodation and there being insufficient homes for both the economically active and economically inactive sectors of the population. The increased pressure for second homes in South Wiltshire and as pre-retired and retired migrants continue to out compete local purchasers, will further exacerbate the existing problems within the Salisbury Housing Market.

Conclusions

- 1.2.16 Having established that considerable weight should be given to the emerging RSS, Persimmon & the Wilton Estate consider that the South Wiltshire Core Strategy is correct to base its housing and employment growth figures on Policy HMA11 of emerging RSS10, in accordance with PPS3 and PPS4¹⁸.
- 1.2.17 This scale of growth will deliver the much needed affordable and general market housing at Salisbury and elsewhere together with additional physical and community infrastructure and employment development.
- 1.2.18 It will help address the issues of affordability in the South Wiltshire Housing Market Area and support improved labour mobility and accommodate an increased workforce during the plan period.

¹⁶ RSS10 EIP Panels Report (2007) Para 4.11.14 RPP/08

¹⁷ Barker Review of Housing Supply (2004)

¹⁸ PPS 4 Planning for Prosperous Communities (2010) NPP/04 D

1.2.19 A minor change to Core Policy 1 would help to clarify the "Policy Requirement side", set out in RSS10 Policy HMA11, and the "supply side" to be identified in the Core Strategy to ensure delivery of this policy requirement.

Q1.3 Employment Land

The CS acknowledges that there is a large over supply 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?

- 1.3.1 Persimmon Homes and the Wilton Estate note that the CS acknowledges that there is a large over supply of employment land in the area, Para 5.46 (f). However, provision is being made in the CS for 13,500 jobs in the Salisbury TTWA, which includes Amesbury, in line with Policy HMA11. The balance of the Policy HMA11 requirement of 400 jobs is to be provided in the South Wiltshire part of the Shaftesbury and Blandford Forum TTWA.
- 1.3.2 Persimmon and Wilton note that the delivery of 13,500 jobs in the Salisbury TTWA will be challenging particularly in the early years given the economic recovery. Therefore, the CS on the 'supply side' seeks to make a generous provision of employment land to facilitate a range and mix of economic development in the Salisbury HMA. By making positive allocations at some of the Strategic Allocations, including Fugglestone Red, the Council seek to increase the range, nature and choice of employment land opportunities at the Salisbury SSCT; and provide additional capacity to accommodate the existing employment uses at Churchfields, which will be displaced by the re-development proposals and foster self containment at the Strategic sites. The policy goal is, over time, to increase provision and availability of employment opportunities at Salisbury itself.
- 1.3.3 Policy HMA11 of the emerging RSS states planning for employment will provide for about 13,900 jobs in the Salisbury Housing Market Area. This is not the same as stating that all new sites to accommodate the entirety of this level of employment need to be identified in the CS. Rather the LPA is being encouraged to formulate a robust and flexible employment strategy to ensure that this level of job growth can be achieved in South Wiltshire. A proportion of the new jobs will inevitably occur at existing businesses and in non-business employment opportunities, such as the service and public sectors (see PPS4 Para 4)¹⁹. The word "about" in relation to the requirement is intended to imply some flexibility in provision across the area.

¹⁹ PPS4 Planning for Sustainable Economic Growth (2009) NPP/04D

- 1.3.4 A proportion of the new jobs will occur at the existing “saved” Local Plan employment allocations, listed in Para 5.46(a). Furthermore, the proposed Strategic Allocations urban extensions will deliver some new employment opportunities as part of the sustainability objective to achieve ‘balanced’ mixed use developments.
- 1.3.5 Therefore, It is incumbent on the planning authority to maintain a robust employment land supply, with a range and choice of potential employment sites tailored to meet a variety of employment needs and demands. The “Saved” employment sites and new allocations, coupled with the employment growth expected at existing employers will ensure that the economic recovery in South Wiltshire is not impeded by a lack of available and suitable employment land and premises and that the jobs target set out in the RSS can be achieved.

Conclusions

- 1.3.6 Having established that considerable weight should be given to the emerging RSS, it is proposed to make provision in the CS for 13,500 jobs in the Salisbury TTWA to reflect the requirements of the RSS and to facilitate a range and choice of employment land to stimulate and sustain economic momentum and growth in South Wiltshire, particularly as the local economy comes out of recession, in accordance with PPS4.
- 1.3.7 Persimmon and Wilton welcome and endorse the proposed approach to employment land provision set out in the CS. In particular, the proposed employment element of the Fugglestone Red Strategic allocation is supported.
- 1.3.8 It is important that the CS provides employment land in the right locations, in future, to accord with the emerging RSS. This will be achieved through a flexible and responsive set of positive allocations and ensuring a generous supply of employment land at the Salisbury SSCT and elsewhere to facilitate a broad range of economic development.

Summary Table 1 Salisbury HMA Housing Requirements (Policy HMA11)

RSS Proposed Changes	Number of Dwellings	Dwellings Per Annum
Salisbury SSCT	At least 6,000 dwellings	300
Rest of Salisbury District	At least 6,400 dwellings	320
Salisbury Housing Market Area	At least 12,400 dwellings	620

Summary Table 2 South Wiltshire Core Strategy (Core Policy 1)

Area	Number of dwellings	Hectares of employment land
Salisbury Community Area	7,480	36 ha
Wilton Community Area	1,570	3 ha.
Amesbury Community Area	2,650	17 ha.
Southern Wiltshire Community Area	740	-
Mere Community Area	290	3 ha.
Tisbury Community Area	440	1.4 ha
Core Strategy Total Provision	13,170	60.4 ha
Salisbury SSCT	7,480	
Rest of District	5,690	

Summary Table 3 Comparative Table of Housing Requirements

Plan Document	No: of Net Additional Dwellings		
	Salisbury	Rest of District	Total
Adopted Wiltshire & Swindon Structure Plan 2016 (1996-2016)	3,900	4,100	8,000
Deposit Draft RSS10 (2006-2026)	5,000	4,200	9,200
RSS10 EIP Panel's Report (2006-2026)	6,000	6,400	12,400
RSS10 Proposed Changes (2006-2026)	6,000	6,400	12,400
ONS 2003 Based Household Projections			12,442
ONS 2004 Based Household Projections			11,407
ONS 2006 Based Household Projections (2006-2026)			9,200

Notes

1. ONS Household Projections relate to Households not Dwellings and therefore do not take account of allowances required for demolitions, vacant stock and second homes in South Wiltshire.

Matter 1

Summary Table 4 South Wiltshire Housing Needs

Affordable Housing by Size and Type – Number of Units

Property Size	Type of Affordable Housing Needed	Salisbury CA	Wilton CA	Amesbury CA	Southern Wiltshire CA	Mere CA	Tisbury CA
1 bed	Affordable Rent	188	106	115	51	0	26
	Shared Ownership	25	0	38	25	0	27
2 bed	Affordable Rent	271	121	118	19	53	27
	Shared Ownership	113	35	110	14	0	0
3+ bed	Affordable Rent	339	29	26	22	47	0
	Shared Ownership	137	20	0	0	0	53
Total	Affordable Rent	798	256	259	92	53	53
	Shared Ownership	275	55	148	39	0	80
	All Affordable	1,073	311	407	131	100	133

Table 4 (contd)

Matter 1

Private Sector Requirements

Property Size	Type of Affordable Housing Needed	Salisbury CA	Wilton CA	Amesbury CA	Southern Wiltshire CA	Mere CA	Tisbury CA
1 bed	General Market	170	0	80	41	0	0
	Private Rented	226	4	48	37	0	10
2 bed	General Market	818	181	183	86	17	23
	Private Rented	296	172	59	73	0	5
3 bed	General Market	665	47	161	111	47	91
	Private Rented	36	57	36	0	6	36
4+ bed	General Market	630	20	206	199	20	106
	Private Rented	54	0	0	0	21	0
Total	General Market	2,283	393	630	437	84	220
	Private Rented	612	233	143	110	27	51
	All	2,895	626	773	547	111	271
Combined Total	Affordable Housing	1,073	311	407	131	100	133
	Private Sector	2,895	626	773	547	111	271
	All	3,968	937	1180	678	211	404

* Source:- DCA Local Housing Needs and Market Survey (2006) STUJ/03

Matter 1

Summary Table 5 South Wiltshire Housing Needs

Affordable Housing by Size and Type

Property Size	Type of Affordable Housing Needed	Salisbury CA	Wilton CA	Amesbury CA	Southern Wiltshire CA	Mere CA	Tisbury CA
1 bed	Affordable Rent	18%	34%	28%	39%	0%	20%
	Shared Ownership	2%	0%	10%	19%	0%	20%
2 bed	Affordable Rent	25%	39%	29%	14%	53%	20%
	Shared Ownership	11%	11%	27%	11%	0%	0%
3+ bed	Affordable Rent	31%	9%	6%	17%	47%	0%
	Shared Ownership	13%	7%	0%	0%	0%	40%
Total		100%	100%	100%	100%	100%	100%

Table 5 (contd)

Private Sector Requirements

1 bed	General Market	14%	2%	17%	14%	0%	4%
2 bed	General Market	38%	56%	31%	29%	15%	10%
3 bed	General Market	24%	25%	25%	20%	48%	47%
4+ bed	General Market	24%	17%	27%	37%	37%	39%
Total		100%	100%	100%	100%	100%	100%

* Source:- DCA Local Housing Needs and Market Survey (2006) STU/03