



South Wiltshire Core Strategy

Matter 1

Core policy 1

The amount of development

Ref: GCD/DJM/SWCS/M1

January 2010

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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?*

- 1.0 PP12 at paragraph 3.1 explains how the RSS sets the regional framework for spatial planning and in paragraph 4.33 explains how, at the local level, Local Planning Authorities should be consistent with this guidance when preparing their Local Development Documents. It is indeed a legal requirement that the production of LDD's conforms generally with the Regional Spatial Strategy (See PPS12, paragraph 4.50)
- 1.1 The question of weight to be afforded the RSS as it undergoes its production stages has been clarified in discussions with the Government Office for the South West, and clarified in their latest communication to the Council (letter copied at Appendix A to this Position Statement). Legal advice taken by the council confirms that the SW RSS carries significant weight as a material consideration and gains weight as it moves through key stages. This offers guidance that progress with Core Strategies should not need to wait for the SW RSS to be issued. South West Councils and GOSW have issued letters stating that the Core Strategy is in general conformity with the emerging SW RSS (see reps numbers 2857 and 167 respectively).
- 1.2 However it is the case that the Regional Spatial Strategy (RSS) has not yet been issued in its final form and has been subject to challenge, particularly on the levels of housing growth that are included within the latest draft document. Indeed the former Wiltshire County Council, as strategic planning authority, in responding to the consultation on this document, raised the specific concern that the Panel did not have sound justification to increase the level of housing for the Salisbury Housing Market Assessment by 1,000 dwellings. The amount of housing development is discussed further in Matter 1.2.
- 1.3 Therefore although the final outcome of the RSS process remains to be seen, the Council as a responsible planning authority has prepared the draft South Wiltshire Core Strategy in accordance with PPS12 and the draft RSS and has produced a flexible document that can adapt to changing levels of growth
- 1.4 The implications of the delay to the South West Regional Spatial Strategy (the RSS) have been carefully assessed. The Core Strategy has been subject to an objective site selection process and the review of the RSS can not change the environmental constraints which apply to south Wiltshire. The strategy is based on meeting local needs in a locally constrained environment.

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?*

- 2.0 PPS12, in paragraph 4.31 states that the regional spatial strategy is part of the development plan for the area by virtue of section 38(3) of the planning and compulsory purchase act 2004. Para 4.33 states that the Core Strategy should be consistent with national policy and in general conformity with the

RSS. In the absence of any other up to date regional or sub regional strategy, then it is correct to use the RSS as the basis for the CS. The local evidence produced to identify the challenges faced in south Wiltshire are outlined in Chapter 3 of the Core Strategy on Tackling Local Needs (See Core Strategy, Chapter 3, pages 19 to 26 and corresponding footnotes). It identifies high need for housing and employment growth which broadly corresponds to the emerging RSS. It is the case that if the Core Strategy were to be produced purely on local needs evidence, setting aside the RSS, that the growth needs would not significantly alter.

- 2.1 The Strategy has been produced based on the housing and employment growth figures within the RSS but in a way that maintains sufficient flexibility in order to be responsive to changes in regional policy. As stated above, the Council, as strategic planning authority raised concern about the justification for the additional 1,000 dwellings within the HMA. Should the RSS take into account this concern then through the monitoring and management of release of land it may not be appropriate to take forward the broad area of search at Salisbury as mentioned in the Council's response to Matter 4.2.

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?*

- 3.0. The Core Strategy plans for the delivery of employment opportunities to meet local needs and the RSS requirement and the saved allocations have been taken into account and will contribute towards the delivery of the 13,900 jobs and will not be in addition to it. The strategy also provides additional employment land to facilitate delivery of a key part of the Salisbury Vision by allowing decant sites from the existing Churchfields site.
- 3.1 The Salisbury TTWA and HMA will need about 13,900 additional jobs from 2006 to 2026 as required by draft RSS Policy HMA11. The Core Strategy makes provision for additional employment land to help deliver these jobs as it is not apparent that the provision of land that already exists, through Local Plan allocations, will deliver this level of job growth as detailed in the Council's response to Matter 4.6. In respect to Solstice Park the majority of the site is likely to deliver around 1200 jobs rather than over 10,000 if the site were occupied by B1 use businesses, for example. In addition, the saved Local Plan allocation sites at Boscombe Down and Porton Down are for high skilled, specialist employment sectors that are important to the Wiltshire economy and therefore should not be considered available for the commercial employment market. The use of the Porton Down site is restricted through the saved Local Plan Policy E8b (LPP/01 page 47) to those activities requiring the co-locational benefits of the specialist facilities and expertise available at the site, primarily research laboratories whilst Boscombe Down is considered more flexibly within the B1 Use Classes.
- 3.2 In addition the SWCS plans for the 'decant' of employment uses from Churchfields Industrial estate to facilitate the Salisbury Vision, thereby creating an additional requirement for a further 28 ha of employment land beyond RSS requirements. The detail of employment land to be saved or allocated is provided in Topic Paper 9 Table 11 (para 5.13). Therefore although there is an apparent oversupply of employment land, due to the specific circumstances surrounding Churchfields , Porton Down, Boscombe

Down and Solstice Park, actual supply will deliver the job numbers required by the RSS. The South Wiltshire Core Strategy therefore makes provision for an appropriate supply of employment land to meet draft RSS targets with potentially a further 10-15 ha of employment land being required in the later stages of the plan period, if ongoing monitoring of job growth indicates a need (see para 6.13 of the South Wiltshire Core Strategy). The strategy of job delivery is also supported by PPS4 EC2.1.

Appendix 1



GOVERNMENT OFFICE
FOR THE SOUTH WEST

21 December 2009

To: All Chief Executives

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Dear Chief Executive

REGIONAL SPATIAL STRATEGY FOR THE SOUTH WEST: ADDITIONAL SUSTAINABILITY APPRAISAL WORK

I thought it would be helpful to bring you up to date with progress on the Regional Spatial Strategy. I wrote to you on 25 June 2009 about the delay to the RSS and the implications for LDF core strategies and planning decisions. I wrote to you again on 25 September informing you of the Government's decision to carry out additional sustainability appraisal (SA) work.

Additional sustainability appraisal work

The judgement following the legal challenges to the East of England RSS pointed to a deficiency in the way the SA for that RSS had addressed the testing of reasonable alternatives. In the light of this judgement we have commissioned additional SA work for the South West RSS. The additional work will therefore identify and appraise reasonable alternatives to the Areas of Search in policies HMA1-13 which were added or amended in the Proposed Changes. The decision to carry out additional SA work does not affect the RSS Proposed Changes as a whole. Land Use Consultants have been commissioned to carry out the additional SA work.

SA is intended to be an objective assessment, which informs policies and proposals in the RSS, but does not itself set out policies and proposals. The scope and level of detail of the assessment will be the same as in previous SA reports.

The additional SA work is expected to report in March of next year. Ministers will then decide how to progress the RSS, which may include additional consultation.

Implications for planning decisions and LDFs

In relation to individual planning decisions, our advice remains that the Proposed Changes to the RSS are likely to be 'material considerations' for any planning decisions bearing on development envisaged in the Areas of Search, or otherwise covered by RSS policies. How much weight to give each policy or proposal is a matter for decision-makers, and this will need particular consideration in cases relating to an Area of Search proposal added or amended at the Proposed Changes stage.

For LDFs, our advice remains that there is no need for the RSS to be issued before progress on Core Strategies can be made. If you have identified particular policy risks in the relationship between the RSS and your Core Strategy, I suggest your planners speak to GOSW's Senior Planning Manager covering your area.

Yours sincerely

A handwritten signature in black ink that reads "Thom Shearer". The signature is written in a cursive, slightly slanted style with a long horizontal stroke at the end.

T M H SHEARER