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21st June 2010

Attention Ian Kemp
Programming Officer
SWCS Examination
36 Campbell Street
RUGBY
Warwickshire
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Dear Inspector Yuille

**Christopher Gillham Representor/2900
SOUTH WILTSHIRE CORE STRATEGY
EFFECT OF NEW STATUS OF RSS**

I am afraid that a holiday followed by illness has not allowed me time to consider the effects of the removal of the RSS on the South Wilts Core Strategy in any detail. Nevertheless I hope that these few sentences will summarise my thoughts on the issue.

As someone from outside Salisbury I have all along been wary of criticising intricacies of strategy that required detailed knowledge either of the area or history of planning thinking. So apart from some attempt to understand what was going on with the traffic modelling (and finding only the unexplained and inexplicable) I tended to make more fundamental observations. Thus in my original submission on Matter 5:

For me the problem of the whole strategy is that it is rooted in unreality. I realise that this is a problem with much or most of the 'strategic' thinking of local authorities across the country and it stems from the same problem at government level.

Specifically I pointed to three unrealities that were at the heart of strategy and yet scarcely mentioned: carbon, resource limitations and economic recession. On the latter I pointed out that:

..... the optimists themselves are saying that we need decades to unsaddle ourselves from the debt we have taken on. It is very difficult to see how this can not affect our perspective of strategy, considering that all the housing and transport predictions pre-date the banking crisis and are founded on a perception of a future that is clearly so at odds with events.

Since writing that, it seems clear that central government at least has moved away from the optimist position and moreover (perhaps in recognition, conscious or otherwise, of the uncertainties) has effectively removed the top layer of the strategy process. That seems pretty fundamental to me and I do not see how it can be otherwise unless strategy is being developed in a very unusual way.

I have had a little to do with industrial strategy development and I've gathered that there are several approaches, which usually involve, in an iterative process, elements both of top-down and bottom-up thinking. The letter (7-6-10) from your EiP Programme Officer, Ian Kemp, restates "*the Council's own locally derived estimates of the need for housing correspond broadly with those in the emerging RSS*". Thus we are assured that the bottom-up position broadly matches the top-down one. Well it would, because that is what an iterative strategy process does – it has got to end up working in both ways. What we do not know is how the two directions have been reconciled and where the compromises have been made.

I am not sufficiently aware of all the background documents. I am pretty sure that there have been many references by or apologia from WC, to the effect that the RSS has set targets that must be accommodated. I do not recall seeing anything which is pure bottom-up – *'this is the local need'*. Moreover, if there has been such an estimate, has it ever been presented to the public for comment, without, in any way, explaining it in relation to the targets set by regional or national authorities?

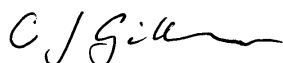
Public consultation issues apart, a mismatch between supposed bottom-up and top-down estimates of housing needs might not be so important if the consequences of dealing with both were broadly similar and acceptable. What was very clear from the EiP, however, was that the so-called transport strategy was in complete disarray and cannot be relied upon as being fit for purpose. I do not intend to rehearse the arguments or observations here. It is clear that the transport consequences of anything like the housing numbers we are talking about are highly problematic and WC has failed to deal with the existing transport and air quality situation.

So it matters that the housing estimates are justified on their own, because any new housing means problems that as yet the transport strategy fails to address. The difference in housing estimates from top-down and bottom-up directions is thus fundamental and needs to be properly established.

But it is the lack of public consultation that is the main issue here and must be challengeable. So far as I know such public consultation as there has been, has been predicated on the assumption that the local authority must accept central and regional government targets as a given. So far as I know the public has never been asked what its views might be in the absence of such a given.

The removal of the RSS is a political decision. It was taken by a Government newly elected and may reasonably be considered in some degree mandated by the electorate. It seems only right that there should be a local democratic presumption that people be consulted on how their community should best respond to the new strategic background, especially one that so affects their way of life.

Yours faithfully

A handwritten signature in black ink, appearing to read 'C J Gillham', with a long, sweeping horizontal stroke at the end.

Chris Gillham