

GODSHILL PC RESPONSE RE ABOLITION OF RSS/EFFECTS ON S WILTS CS

Dear Mr Kemp

Thank you for your letter conveying the Inspector's request for views on whether the abolition of Regional Spatial Strategies affects the soundness of the draft South Wilts Core Strategy now subject to Examination.

In summary, yes, we do consider that there are numerous instances where the SWCS cites RSS policies as dictating or supporting their submitted policies and therefore these need to be revisited.

Godshill Parish Council's main concern is the effects of increased traffic on the New Forest National Park. Comments on Transport links are therefore placed first in the following list of examples. Otherwise for convenience the extracts are in the order of the CS document.

Obviously spatial strategy, location of sites and numbers of houses and jobs all affect transport, which is why we feel the opportunity provided by the abolition of the RSS should be taken to integrate the promised Transport Policy into the overall Core Strategy.

Some examples: (Extracts from CS in italics, emboldening ours)

1. Assessment of importance of transport links

Map 4, Page 72

It is noticeable that the black arrows, denoting major transport routes are reserved for areas of the South West Regional Spatial Strategy. Arrows denoting links with London, Southampton and other more important areas are grey, denoting merely "important functional relationship". This difference would appear to be influenced by the boundary between the SW Region and the SE Regions – both of which have now had their Strategies in effect already removed.

Godshill PC has been trying to emphasise the importance and adverse effects of traffic, both freight and commuter, between Salisbury and areas to the east, notably Southampton and Portsmouth docks – the main outlet for Salisbury business with the rest of the world. It is therefore not unreasonable to suggest that without the SW RSS the Core Strategy might have been more concerned about eastern links and the necessity of spatial planning designed to avoid creating traffic through the New Forest National Park, rather than being restricted to concerns about effects on the A36 through Salisbury and, to a much lesser extent, the rest of the SW Region.

2. Location of strategic sites

*1.23 Although 8,500 representations have been received it is important to emphasise that the identification of Core Strategy policies is not a straightforward 'popularity contest'. While the representations are an important material consideration, there are other issues that equally need to be taken into account. These include conformity with national **and regional** policy, analysis of evidence, sustainability assessments, capacity of infrastructure, environmental protection, consideration of options and deliverability.*

When we learn that a great majority of the representations received were concerned with one particular site (Netherhampton Road), and emphasis has been placed by council officers on the RSS as a reason for the need to go ahead with that site, the makers of those representations may reasonably expect further investigation in the EiP.

3.4(d) Location of existing available employment land.

*There is a large oversupply of employment land within the Salisbury Travel to Work Area ("TTWA") at the current time. The majority of this employment land is located on Solstice Park, Amesbury. **The RSS recognises Salisbury as the key employment centre with the key strategic aim being to extend and enhance the city as an employment and retail centre, so it can better serve the surrounding rural area and achieve greater levels of self-containment. Therefore, this sets the further challenge of seeking how to ensure that the strategic employment land provision will be delivered at Salisbury.** (Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes (July 2008) (paragraph 4.1.78 page 116)*

*(f) Review of existing employment and land supply. There is a large oversupply of employment land within the TTWA at the current time⁶³. However this land is not in the optimum location. **The RSS recognises Salisbury as the key employment centre with the key strategic aim being to extend and enhance the city as an employment and retail centre. It recognises that there are opportunities for some modest job growth at locations such as Amesbury, but is clear that the majority of the extant employment land available in south Wiltshire no longer conforms with the RSS because it is not located in Salisbury⁶⁴.***

*Some 64ha of employment land is available at Solstice Park, which no longer directly conforms to the RSS. However this land is consented and remains available for development. Therefore although employment development on this site can proceed in accordance with its planning permission, **the allocation will not be relied on to meet the strategic requirements of the RSS and the allocating policy will not be saved. If the site is not developed in a timely manner it will be reviewed through the Site Specific Allocations DPD to identify whether the site is more appropriate for another use.***

64Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes 2008 (paragraph 4.1.77)

(g) Amesbury West has the third highest recorded level of crime in south Wiltshire and the highest levels of violent crime and domestic violence. The Amesbury Community Area as a whole commonly features behind the Salisbury Community Area as the second highest area for reported incidents of anti-social behaviour, with 22% of the total reported incidents

(k) In Amesbury there are fewer people with high-level qualifications and more with no or low-level qualifications compared to the rest of south Wiltshire, the South West and England. Of 137 Wards in Wiltshire, Amesbury is the third lowest ranking in terms of education, skills and training.

3.7(b) Retailing outside of Salisbury

Growth in Amesbury has outpaced the provision of retailing and services, and large proportions of the community travel significant distances to centres such as Salisbury and Andover for their weekly shopping needs. This has led to pressure for edge or out of centre retail development, which is a threat to the traditional centre and needs to be carefully managed.

2.5 Cross Border Relationships. The South East corner of south Wiltshire bounds the New Forest National Park, indeed parts of the Wiltshire parishes of Redlynch, Landford and Whiteparish lie within the National Park and fall under the jurisdiction of the National Park Authority for planning purposes. Development proposals in south Wiltshire, particularly in the Southern Community Area, but also to some extent in Salisbury itself, will place pressure on the National Park, especially in terms of recreation and transport links. Care must therefore be taken to ensure that proposals do not have a detrimental impact on the National Park.

2.6 The southern part of Wiltshire also has strong relationships with Dorset and Hampshire. Southampton (identified as a Regional Hub in the South East Plan) and the conurbation of Bournemouth and Poole (identified, with Christchurch, as a Strategically Significant City or Town (South East Dorset) in the South West RSS) provide a wider range of employment, leisure and cultural opportunities than can be found in Salisbury. Air and seaports related to these settlements are widely used by south Wiltshire residents.

Given the evidence shown above of need in and around Amesbury for jobs, training, retailing and wealth creation, and the fact that there is an over-supply of employment land in its vicinity, we feel that the apparently arbitrary imposition of too much (in most residents' opinion) development close to Salisbury should be looked at again. Paras 2.5 and 2.6 above also point out the damaging consequences of placing extra pressure from new strategic developments south of Salisbury on the New Forest National Park, and the close links with Southampton will inevitably draw extra traffic across the Park. Now that the RSS is no longer in force, we believe that the policy of concentrating so much of employment development close to Salisbury should be re-examined.

3. Housing numbers

*1.12 The Regional Spatial Strategy for the South West (RSS) forms part of the development plan for Wiltshire and sets out the numbers of houses and jobs that should be provided for. These figures are identified using a review of evidence on the expected economic and population change, regional housing requirements, resources and infrastructure available, the role and function of places and sub-regional relationships between places. The Secretary of State's Proposed Changes to the Draft RSS for the South West suggests a housing requirement of 12,400 homes for south Wiltshire for the period 2006-2026. This would require an average housing delivery of 620 dwellings per year. This broadly corresponds with the level of need that has also been identified at a local level. **The Core Strategy must be in conformity with the RSS***

Knowing that the RSS figures had to be obeyed, there was not much point in arguing against these figures at the Examination hearings. However, Salisbury District Council in 2007 wanted no more than 9,000, because a greater number would affect the character and setting of the City. We therefore submit that, since the demise of Salisbury DC, Wiltshire Council and Salisbury City Council (the latter because it is the only democratically elected body with a specific remit to represent the people of Salisbury, and because it will have the right to be consulted on any planning applications made in pursuance of the Core Strategy) should be asked whether they now agree with the RSS figure of 12,400. Other stakeholders should also be given the opportunity of an in depth examination into the need for such a high number in or very close to the City.

3.3 A Strategy of Managed Growth - Identifying Pressures leading to Local Housing Needs

The Strategy plans for managed growth to deliver the new houses required to meet local needs. The levels of growth required accord with those set out in the emerging RSS of 12,400 houses to be delivered in the Salisbury Housing Market Area ("HMA") of south Wiltshire between 2006 and 2026.

3.3(d) The need created by a growing population. By 2026 the population of south Wiltshire will be likely to have grown by about 14,000. This presents a clear need for new housing to be built to meet demand.

5.48 The type of houses that are needed - affordable housing
Previous chapters have highlighted the problem in providing enough affordable housing in south Wiltshire. PPS3 requires an overall, plan-wide target to be set for the amount of affordable housing to be provided. **The RSS requires that 35% of all housing development annually in the south Wiltshire HMA is affordable.** This means that of the 12,400 homes that this strategy seeks to deliver, 4340 need to be affordable homes. **Since the start of the RSS period (2006) to adoption of this Core Strategy(2010), 308 affordable dwellings will have been delivered through completions and commitments.** Therefore, 4032 affordable homes need to be delivered over the 16 year plan period of the Core Strategy (2010 to 2026), the equivalent of approximately 250 per annum.

A legitimate question arising from the above extracts is to ask why 12,400 houses are needed for a rise in population of about 14,000. Does mean that the large majority of new homes would be for single person occupation? 3.3 (c) expects a greater number of such households, but the experience countryside is that it is family homes which are in the shortest supply. We did not put these questions at the EiP because the RSS specified the targets.

4. Numbers of jobs

Para 4.4

Headline performance indicator: Creation of new jobs per year (monitored on NOMIS figures at www.nomisweb.co.uk and reported in AMR). **Target:** average of 690 jobs per annum (as per RSS requirement)

We need to examine more thoroughly the need for this number of jobs, now that the RSS is about to be removed.

5. Settlement hierarchy

The hierarchy of settlements is as follows:

A: Salisbury: The city of Salisbury is identified as a Strategically Significant City ("SSCT") **under Development Policy A of the RSS** and is the primary service centre in south Wiltshire. Because of the level of services, shops, jobs and homes the city provides, the larger proportion of growth will be concentrated here.

43The Settlement Strategy is based on clear policy drivers from national **and regional level** for development to be focused in existing centres, using the provision of Basic Facilities in settlements to establish a hierarchy. **Transport (Paragraph 6). RSS: Section 2 (Overall Approach; Development Policies A, B and C (with supporting text)).**

5.7 The Spatial Strategy for South Wiltshire

South Wiltshire will plan for 12,400 houses and 13,900⁴⁸ jobs over the next 20 years. 13,500 of these jobs will be delivered in the Salisbury Travel to Work Area ("TTWA")⁴⁹ within south Wiltshire. A further 400 jobs will need to be delivered within the rest of south Wiltshire, outside the TTWA.

48Draft Revised Regional Spatial Strategy for the South West incorporating the Secretary of State's Proposed Changes (July 2008) (Policy HMA11, page 117)

Core Policy 1 - The Settlement Strategy and distribution of growth in south Wiltshire
This strategy plans for the delivery of 12,400 dwellings and 13,900 jobs over the period to 2026. The growth required to meet local needs will be accommodated in the following manner:

*Salisbury Planned growth: 7480 homes and 36 ha (30ha new allocation and 6ha saved) of employment land. A retail-led mixed-use development is also planned. The city of Salisbury is identified as a Strategically Significant City or Town ("SSCT") under **Development Policy A of the RSS**. Salisbury is the primary service, economic and cultural centre for south Wiltshire and, **in line with RSS**, will remain the focal point for the majority of new development in south Wiltshire*

*Downton is a large settlement providing a good level of services and performs the role of Local Service Centre for this Community Area. It provides a good source of employment with one of eight strategically important employment sites in south Wiltshire located in Downton. The secondary villages (**equivalent to RSS Development Policy C**) in the Southern Wiltshire Community Area are Alderbury, Coombe Bissett, Morgan's Vale/Woodfalls, Pitton, Whiteparish and The Winterslows.*

The above extracts from the draft CS show that not only were housing and job numbers dictated by the RSS, but it also had a strong influence on the distribution of growth. The greatest amount of development has to be concentrated in the south-east corner of the County, where it will have the most adverse effects on the New Forest. Little discussion took place at the hearings on whether Downton was well placed to be a service village to the Winterslows, for example. Such decisions were based on the RSS.

6. NEED FOR STRATEGIC SITES

5.19 Strategic Site Allocationss5

*This Spatial Strategy is based on frontloading housing and employment delivery. This is because recent trends for housing delivery have been below that required and **in accordance with RSS** there is a need to increase economic productivity and deliver socially balanced communities*

5.26 Explanation of the Housing Trajectory

*The Housing Trajectory above shows how we can meet both our needs and **the RSS targets** based on the strategy of releasing development sites in a timely manner. The trajectory is based on a realistic evaluation of housing supply, informed by the Strategic Housing Land Availability Assessment, which has included evidence from developers regarding projected build rates, and the requirements and timing of essential infrastructure provision⁵⁷.*

*5.27 In accordance with PPS3 the Core Strategy plans for the supply of continuous housing over a 16-year period and identifies specific sites and broad locations for further development. Furthermore, this strategy **exceeds the requirements of PPS 3** in that it will deliver more than a 10-year supply of deliverable sites from the date of adoption of the Core Strategy. This "front-loading" approach has been deliberately designed to ensure that there is no shortfall in the delivery of homes in south Wiltshire. This approach, (to be achieved through the early release of strategic allocations, the saved Local Plan allocations and commitments) will provide over 8000 houses in the initial years of the Strategy, and represents a step-change in housing delivery. A further supply of housing will also be delivered through a subsequent Site Specific Allocations DPD. This overall strategy **ensures that we meet both the requirements of the RSS and PPS3**.*

5.40 Addressing these issues requires a flexible approach and the strategy of frontloading provides this by only identifying strategic sites where there is evidence of a commitment to start delivery within the first five years of the plan. There is a contingency in this approach of oversupply in that the failure to develop any one or two of the sites would not prevent the overall aims of the Strategy being achieved through the delivery of the other sites.

*5.41 While the frontloading strategy has been partly designed to treat the cause of past undersupply of housing it is important to emphasise that this is a forward looking strategy. The level of contingency built into the frontloading will allow non-delivery of several strategic sites and **still allow the RSS targets and local needs figures to be met and thereby still address the challenges that under provision has caused.** The driver of frontloading is thus twofold, both to address the challenges historic under provision has caused and to ensure that the Strategy has sufficient contingency to deal effectively with unforeseen circumstances.*

*5.42 The delivery of the other strategic sites will allow the decanting of business from the Churchfields site, which is central to the economic policies of the Strategy. Whilst it is acknowledged that the redevelopment of Churchfields relies on other sites, **it is again the case that the failure of any one of these sites would not hamper the overall strategy.***

Paragraphs 5.40, 5.41 and 5.42 above admit that not all of the proposed strategic sites need to be delivered for the needs of South Wilts to be satisfied: another valid reason to reconsider the unpopular Netherhampton Road site.

7. Gypsies and Travellers

*5.51 Making adequate provision for Gypsies and Travellers
South Wiltshire already has a good range of pitches for Gypsies and Travellers (around 35% of the total county provision) and the number of unauthorised encampments has been low, however there is a need to make provision for additional accommodation⁶⁹. **The RSS requires the provision of an additional eighteen residential and five transit pitches in south Wiltshire to 2011 as well as contributing towards the 5 plots required to meet the needs of travelling show people.** This provision will be delivered through a DPD for the whole of Wiltshire.*

13.3 Next Steps and further Local Development Framework Documents p
Gypsies and Travellers To establish a common, effective Development Plan Document approach across Wiltshire that as per LDS meets RSS requirements and identifies itches

The area of South Wiltshire closest to the New Forest National Park already has one third of the existing sites in Wiltshire. Without the RSS, it would be good to discuss a more equal distribution of these sites.

8. Salisbury

6.1 Portrait of Salisbury

Salisbury city is the main centre of south Wiltshire, acting as a focal point for a wide rural catchment and it is identified in the emerging RSS as a strategically significant city. The council has undertaken a visioning exercise, which sets out plans for the future evolution of the city.

6.25 This Strategy promotes the sensitive regeneration of a mixed-use retail led development on the Maltings and Central Car Park. Not only is the site sequentially

preferable in PPS6 terms, but it also offers an excellent opportunity large enough to deliver the level of retail development needed for the city within a central location⁸⁷. Its proximity to the existing city centre means it can complement the existing centre rather than compete with it. It will also incorporate an element of residential, office and leisure uses and form an extension to the primary shopping area (in line with PPS6). As such, the Maltings and Central Car Park site is allocated to meet this need⁸⁸.

88This is supported by policy HMA 11 (page 118) of the Draft Revised Regional Spatial Strategy for the South

6.28 Managing Delivery of the Strategy for Salisbury

*The housing trajectory overleaf shows how the Strategic Site Allocations in Salisbury (alongside those in Amesbury and Wilton) will **be delivered in a timely manner to meet local needs and the RSS targets***

*8.20 At Solstice Park, Amesbury, some 64ha of employment land is available. **This no longer conforms with the RSS, which instead directs major employment growth to Salisbury.***

It would be good to re-think this policy without the influence of the RSS.

9. Green infrastructure

12.4 Green infrastructure *Green infrastructure ("GI") is the physical environment within and between our cities, towns and villages. It is a functionally linked network of open spaces, including formal parks, gardens, woodlands, green corridors, waterways, street trees, open countryside, and sites of importance for biodiversity.*

The RSS requires authorities to produce Green Infrastructure Plans¹³³.

10. Netherhampton Road Site

Page 161 Land South of Netherhampton Road, Netherhampton

Transportation: ...A Transport Assessment which sets out how the modal shift promoted at national and RSS level will be achieved...

The proposals for the Netherhampton Road site pay scant attention to transport. This could be even worse without the achievement of "RSS level". Urgent revisitation therefore needed.

11. List of references to RSS

Page 186 Appendix E, refers to numerous RSS policies. This illustrates how closely the Core Strategy has been based on the RSS.

12. Monitoring

Graph Four: The Core Strategy Monitor Line showing the amount of dwellings above or below the cumulative annualised RSS figure

This shows the number of dwellings above or below the cumulative annualised RSS figure at any given point in the plan period.

14. OPEN SOURCE PLANNING

This document highlights the general acceptance that a five-year land supply provides a good base line from which to work. Godshill PC therefore suggests that the Draft Core Strategy should be working to a five-year time scale rather than 16 as at present.

In view of all the above points, we should be grateful if the Inspector would consider re-opening the Examination.

Yours sincerely

Godshill Parish Council