

MF/VG/CIR.P.0264

17<sup>th</sup> June 2010

Ian Kemp  
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South Wiltshire Core Strategy Examination  
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Dear Ian

**South Wiltshire Core Strategy Examination in Public  
Response on behalf of Persimmon Homes & the Wilton Estate  
(Rep No. 2760)**

Further to your letter of 7<sup>th</sup> June 2010 regarding the Inspector's request for comments on the effect, if any, that the intention to abolish the emerging RSS has on the soundness of the Core Strategy, I set out below the response on behalf of my clients Persimmon Homes and the Wilton Estate.

My clients note, in a letter dated 27<sup>th</sup> May 2010, the new Secretary of State indicated the Government's intention to abolish the Regional Spatial Strategies, including the Regional Spatial Strategy for the South West (Proposed Changes July 2008). The Secretary of State has also confirmed that his letter, dated 27<sup>th</sup> May 2010, is a material planning consideration.

However, it should be noted that the Decentralisation and Localism Bill has yet to be debated or enacted, thus the Regional Spatial Strategies remain part of the statutory Development Plan, until they are abolished. RSS10 is at an extremely advanced stage; Post Examination in Public, Panel's Report and consideration of the Panel's recommendations by the Secretary of State, but does not have the full weight of Section 38 (6) behind it. However, given its advanced stage, Persimmon and Wilton consider that significant weight should still be given to the emerging RSS.

The Proposed Changes to RSS10 and the associated Evidence Base remain material considerations to the South Wiltshire Core Strategy Examination.

Whilst the Secretary of State's letter and the emerging RSS are both material considerations a judgment needs to be made regarding the relative importance and materiality of each considerations having regard to the inter-relationship to other defined material consideration. In the absence of any clear and defined transitional arrangements or timetable regarding the eventual abolition of the RSS, Persimmon and Wilton consider that greater weight should be given to the emerging RSS, as it remains part of the Statutory Development Plan.

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Notwithstanding the powers available to the Secretary of State it is noted that he has not formally withdrawn or abolished the emerging RSS.

My clients note when the emerging RSS was considered at the Examination Hearing Session there was general agreement that it was right for the housing figures in the Core Strategy to be based on the emerging RSS. Therefore, Persimmon and Wilton endorsed the validity and appropriateness of the emerging RSS figures to inform the content of the Core Strategy and remain of this view, despite the Secretary of State's letter.

Eventually, decision making powers on housing and planning will return to Wiltshire Council. Decisions on the housing supply in the South Wiltshire Core Strategy and elsewhere in Wiltshire will rest with Wiltshire Council without the framework of regional numbers and plans. However, the South Wiltshire Core Strategy, subject to the timing of the completion of the Inspector's Report and the final stages of plan preparation, is likely to be completed before the Decentralisation and Localism Bill is enacted and the Act becomes operational. Clearly, changes to primary legislation, associated regulations and revisions to the planning policy statements or the new National Planning Statement will take many months, if not years, to be completed. Therefore, given the need to expedite the delivery of Development Plan documents and maintain an up to date Local Development Framework planning policy framework, it would be undesirable to delay the finalisation of the South Wiltshire Core Strategy. (See PPS12 paras 2.2 – 2.7)<sup>1</sup>.

Persimmon and Wilton note that the revised PPS3 (June 2010) reaffirms the Government's objectives for housing<sup>2</sup>.

The revised PPS3 (June 2010) continues to state its principal aim is to underpin the Government's response to the Barker Review of Housing Supply and the necessary step-change in housing delivery, through a new, more responsive approach to land supply at the local level. The Strategic housing policy objectives and the planning for housing policy objectives are unchanged.

Persimmon and Wilton note that advice set out in PPS3 paras 32 – 35<sup>3</sup> relate to assessing an appropriate level of housing. These paragraphs do not solely relate to the regional tier of planning.

Persimmon and Wilton draw the Inspector's attention to the underlying reasons why Wiltshire Council resolved to continue progress on the former Salisbury District Core Strategy rather than opt for producing a Wiltshire-wide Core Strategy in the first instance, following Local Government Re-Organisation, in particular the need to expedite the delivery of housing, including affordable housing and economic development in South Wiltshire, formerly Salisbury District. These reasons were debated at the Hearing Sessions on several occasions.

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<sup>1</sup> PPS12 Local Spatial Planning 2008 Paragraphs 2.2 – 2.7).

<sup>2</sup> PPS3 Housing June 2010 Paragraphs 9 & 10.

<sup>3</sup> PPS3 Housing June 2010 Paragraphs 32 – 35.

As previously stated at the Examination, the Adopted Salisbury District Local Plan is the oldest Local Plan in Wiltshire and its policies are somewhat dated and predate much current national and regional planning policy. Therefore, a more up to date policy framework would be desirable to guide future development in South Wiltshire.

The Council's locally derived evidence base, including the Strategic Housing Market Assessment and the revised SHMA work being undertaken by David Coultie Associates, supports the validity of the proposed housing figures for South Wiltshire and correspond broadly with those in the emerging RSS. The evidence support the level of growth identified in the RSS and was discussed at the Affordable Housing Hearing Session.

Persimmon and Wilton also note that the South Wiltshire Core Strategy has been prepared to include sufficient flexibility to cope with and accommodate any differences between the emerging RSS figure and a locally determined scale of growth.

The issue of the overall level of growth was examined under Matter 1. The Inspector's attention is drawn to Summary Tables 3, 4 and 5 of the Persimmon and Wilton Statement<sup>4</sup>. These tables seek to usefully summarize the various figures proposed for Salisbury district, now South Wiltshire, as the RSS evolved and for the Structure Plan. Tables 4 and 5 relate to evidence derived from the Strategic Housing Market Assessment, which features in the Core Strategy.

Particular attention is drawn to the provision for Salisbury SSCT itself in the Deposit Draft RSS10 of 5,000 net additional dwellings, (The Option 1 figure) and the Panel/Secretary of State's increase to 6,000 dwellings for the period 2006 – 2026. A much larger increase was proposed in the Rest of District area. (See Summary Table 3).

The evidence to support at least 5,000 new homes at Salisbury SSCT is not solely derived from the emerging RSS. Therefore, the Government's intention to eventually abolish the emerging RSS does not undermine the overall Soundness of the South Wiltshire Core Strategy.

It is noted that over time the Wiltshire Local Development Framework Core Strategy will eventually be replaced by a "new style Local Plan for Wiltshire", once further details are known. Whilst the timetable for preparing the new style plans is unknown, it is reasonable to assume that work on the new plan will commence well before the South Wiltshire Core Strategy expires in 2026, most probably once the Wiltshire-wide Core Strategy work has been completed. Therefore, any adjustments required to the forward land supply and the level of housing provision at the Salisbury SSCT and in the Rest of District area can be made in the replacement 'development plan' document.

For the reasons set out above, Persimmon and Wilton do not consider that the Government's intention to abolish the emerging RSS will render that the South Wiltshire Core Strategy, incorporating the various major and minor changes

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<sup>4</sup> Persimmon and Wilton Response to Matter 1 Summary Tables 3, 4 & 5.

recently consulted upon, unsound. Until the RSS is abolished and any transitional arrangements put in place, the Inspector should continue to treat the emerging RSS as part of the development plan.

Persimmon and Wilton do not believe it is necessary to re-open the Hearing Sessions as the Inspector has raised clearly defined issues to which written responses should be sufficient to clarify the participant's positions. However, should the Inspector consider it necessary to reconvene the Inquiry, Persimmon and Wilton would be happy to participate in a further Examination Session to discuss this matter, if this would of assistance.

Please do not hesitate to contact me should you wish to discuss this response further or if the Inspector requires any clarification of my client's position regarding the Secretary of State's letter.

Yours sincerely



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