

**The Implications of the Abolition of the Regional Spatial Strategy for the South  
Wiltshire Core Strategy**

**1) Introduction**

1.1 The announcement by the Secretary of State for Communities and Local Government of the intended abolition of the Regional Spatial Strategies, with the consequence that decisions on housing supply will henceforth rest with local planning authorities without the framework of regional numbers and plans, creates an opportunity to consider anew the feasibility and soundness of the proposals in the light of constraints to growth. In particular, the opportunity exists to reappraise development proposals, taking account of the limitations imposed by the transport infrastructure, and the current economic situation.

**2) The Housing Requirement**

2.1 It is clear that the estimated number of proposed new houses required in South Wiltshire by 2026 has been driven steadily upwards during the course of the preparation of the Core Strategy, from 9,200 in Topic Paper 2 (Housing) in 2007, to 12,400 in the current draft DPD, an increase of 35% in three years. This appears to have been entirely as a result of the RSS target figure for the then Salisbury District Council area having been increased. There appears to be no empirical evidence underlying the increase in the estimated housing requirement. Topic Paper 2 did refer to the then estimate of the increase in the housing requirement as being essentially due to increasing employment within the district. However, if increasing employment was seen as the principal driver for the lower number of new dwellings proposed in 2007, it is difficult to justify a 35% increase in this figure at a time of economic recession, when employment is decreasing rather than increasing, and indeed when two of the major employers in the district (UK Land Forces HQ, and the Health Protection Agency) are either in the process of moving out of the district, or have announced their intention to do so.

2.2 The *Local Housing Needs and Market Survey* (2006) predicted a 12.3% increase in the population of the district between 2001 and 2021, and it was in the light of this prediction that the initial proposed increase in new dwellings of 9,200 by 2026 was made. However, Wiltshire Council's own estimate (see their website) of population growth in the former Salisbury District between 2001 and 2006 was only 1.6%, at a time of growth and apparent economic prosperity, so it is difficult to envisage an employment-driven increase on the scale the council is anticipating, at this time of economic stringency which is likely to last for some years. In any case, it is well-known that census-based population projections become steadily more inaccurate the further away from the datum point of the decennial census they are made, and these inaccuracies, particularly at a district level of aggregation, are frequently large. Since a new decennial census is due next year, and the initial results will be available by 2012 at the latest, it would be sensible to defer any definitive decisions regarding likely population growth until these can be based on real data, rather than on estimates that may have deviated wildly from the actual situation.

- 2.3 In addition to uncertainty over the population growth figures on which the Core Strategy DPD new housing requirement is based, there is also some doubt over the reliability of a housing market assessment carried out four years ago, before the current economic downturn. It is likely that this, coupled with likely restrictions on the availability of funds for mortgage lending, will also have the effect of depressing demand for new houses. Again, too much time has elapsed for this survey to be regarded as having any useful bearing on current demand, and should be repeated.

### **3) Transport**

- 3.1 What clearly emerged from the Examination in Public was the extent to which the development targets proposed in the draft Core Strategy followed those laid down in the Regional Spatial Strategy. Where concerns were raised as to the soundness, sustainability and feasibility of these targets, for example in respect of their environmental impact, or the capacity of the transport infrastructure to cope, little evidence was produced to allay these concerns. As regards transport, for example, in response to the observation that contentious statements regarding the conclusions to be incorporated in the Salisbury Transport Strategy (i.e. that there were no insurmountable barriers to delivery of the Core Strategy, that the transport network would be able to support the proposed level of growth over the plan period, and that it was unlikely that significant new road building would be required) should be supported by evidence, Wiltshire Council replied (on 4<sup>th</sup>. December 2009) that “In a nutshell the work carried out on the review of the Salisbury Transport Strategy is focused on delivering the growth scenario as set out in the SWCS”. Since we have still not seen the Salisbury Transport Strategy, despite its intended publication date of December 2009, it would not be unreasonable to conclude that some difficulties have emerged as regards the capacity of the local transport infrastructure to support that growth scenario. This is made more likely by my conclusion, from reviewing the validation documents, that the model intended to underpin the Transport Strategy is seriously flawed.
- 3.2 In response to a comment in the consultation exercise on the draft Core Strategy that “The current road infrastructure is quite poor, it would need to be improved if development is to go ahead. Access is a key factor in planning new sites; the roads need to be improved for those who currently live there”, Wiltshire Council replied: “These issues would have to be satisfactorily resolved before allowing new growth in this area and will be considered in detail and in consultation with the public, through preparation of the subsequent site specific allocations DPD.” This amounts to an admission that these matters have not yet been satisfactorily resolved, and the abolition of the regional Spatial Strategy creates an opportunity to conduct a complete review of housing and employment needs, the environmental impact and sustainability of specific proposals, and the capacity of the transport infrastructure to support them. We should take the abolition of the RSS as an opportunity to re-evaluate the housing need, without the need to conform to a wholly artificial, externally imposed timetable, and to do so on the basis (a) total transparency about how the Council has reached its conclusion, the assumptions they have made, and the methods they have used in their calculations, (b) a genuine consultation, in which we all get the opportunity to consider in detail all the available evidence, to examine where necessary Council officials, and to make representations and influence thinking on this matter. There is clearly a need for sober reflection and wise judgement on this as on other issues.

### **4) Planning Policy Statement 3 - Housing**

- 4.1 It should be noted that, in parallel with the Secretary of State's announcement of the abolition of the Regional Spatial Strategies, a new edition of *Planning Policy Statement 3 – Housing* (PPS3) was published in June. Despite the impending abolition of RSSs, this carries frequent reference to the RSS as the principal determinant of the need for new housing. For example, paragraph 34 states: "Regional Spatial Strategies should set out the level of overall housing provision for the region, broadly illustrated in a housing delivery trajectory, for a sufficient period to enable Local Planning Authorities to plan for housing over a period of at least 15 years." Similarly, Paragraph 37: "At the regional level, the Regional Spatial Strategy should identify broad strategic locations for new housing developments so that the need and demand for housing can be addressed ...", and Paragraph 42: "At the regional level, Regional Spatial Strategies should set a target for the proportion of housing development that will be on previously-developed land over the plan period." It should be noted, though, that the back cover of PPS3 is labelled "To be updated", so clearly these passages are likely to be amended.
- 4.2 Meanwhile, PPS3 does make some useful stipulations that could be taken into account in any review of housing and employment needs and provision in South Wiltshire. Thus, at paragraph 38, it refers to "... the need to provide housing in rural areas, not only in market towns and local service centres but also in villages in order to enhance or maintain their sustainability." One of the problems with the draft Core Strategy was the intention to concentrate most growth in South Wiltshire on the perimeter of Salisbury, which, in addition to imposing an unsustainable burden on the transport infrastructure, would have altered substantially the character of the city. Clearly, all communities, if they are to thrive, need to grow, and there is an opportunity now to attempt to achieve balanced growth across the district, so that smaller towns and villages in the district can also develop as sustainable communities.
- 4.3 Paragraph 11 of PPS3 calls for an evidence-based policy approach. The impression I have to date (though, to be fair, I have concentrated on the transport issue) is that the selection and presentation of evidence has been somewhat partial and slanted, in order to enable a Core Strategy to be presented which conforms to the requirements of the RSS. Wiltshire Council has relied largely on the RSS in developing the draft Core Strategy.

## 5) **Conclusion**

- 5.1 Many of those who participated in the consultation process, or submitted written or oral evidence, had misgivings about this, so it would be useful now if there could be a reappraisal and further consultation on a revised Core Strategy taking into account both the very different world in which we now live compared with that which existed when the process began, and the policy implications of the abolition of the Regional Spatial Strategy, and with a much more rigorous approach to the acquisition and presentation of relevant evidence. This would be consistent with the stipulation in Annex B, paragraph 14, of PPS3 that: "Local Planning Authorities should develop a shared vision with their local communities of the type(s) of residential environments they wish to see ...". The draft Core Strategy, as it stands, is for the reasons outlined above, unsound, and needs significant revision in order to overcome this.

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