

**South Wiltshire Core Strategy Examination**  
**Response to letter dated 7.6.2010 re abolishing of RSS targets**

**1. Introduction**

1.1 We welcome the invitation in the letter from Ian Kemp dated 7<sup>th</sup> June 2010 to comment on the implications of the abolition of the emerging RSS on the soundness of the South Wiltshire Core Strategy.

1.2 The primary focus of Salisbury Campaign for Better Transport is of course transport, however the level and location/type of new housing is of key relevance since higher housing levels almost inevitably lead to increased traffic. This is especially the case if the traditional model of edge of town urban extensions is pursued in the absence of truly radical transport and development options which reduce car use. We have made the point throughout the Examination in Public process that we believe the South Wiltshire Core Strategy fails to show that there is a robust transport strategy which will accommodate the scale of development currently proposed for Salisbury in a sustainable manner.

**2. Source of housing numbers for the Core Strategy**

2.1 We are aware of the following steps whereby housing numbers rose as the Core Strategy was developed:

- Topic Paper 2 on Housing (June 2007) quoted the draft RSS figure of 9,200 proposed dwellings in Salisbury District for 2006-2026 (5,000 in the City & 4,200 in the rest of the District), indicating that this was influenced by the District Council who wished to ensure that development levels had regard to constraints (i.e. landscape quality, ecology and the Avon River system) which exist locally.
- The 'Our Place in the Future' consultation (June 2007) stated houses to be delivered would be in the range 10,000 – 12,000, the actual number would be determined by the RSS.
- The Panel report on the RSS in December 2007 suggested a number of 12,400 new homes were required.
- The Core Strategy preferred options report in Feb 2008 took the 12,400 figure from the RSS Panel report
- By the time the Core Strategy reached the EiP stage, Wiltshire Council's position was that they were concerned about an additional 1,000 dwellings in the latest figures in HMA11 of the emerging RSS (Matter 1, WC doc ref: GCD/DJM/SWCS/M1, Jan 2010).

2.2 The overall picture here is one of the RSS driving up the housing numbers. Responses to the Feb 2008 preferred options report are reported in Topic Paper 2 on Housing Addendum 2 (July 2009). Local residents could not understand how the housing figure of 12,400 was derived or how Salisbury could retain its distinctive character and landscape setting if swamped by this level of new housing (see comments in relation to PO3c p. 6-7).

2.3 The letter dated 7 June 2010 from Ian Kemp stated that "*the Council's own locally derived estimates of the need for housing correspond broadly with those in the emerging RSS*". However this would appear to be in no small measure because the Council were aware that they were obliged to use the figures from the RSS and the figures were driven upwards over time because of this.

- 2.4 Another factor to be considered is the current validity of economic growth assumptions which underpin housing number assessments. Topic Paper 2 on Housing (June 2007) quoted (p. 13) from the Housing Needs and Market Assessment which the Council had commissioned in 2006: “*During the next 3 years migration of households into the district from outside the area will exceed those leaving the district by around 680 households – primarily driven by job creation in the district.*” This assumption surely needs to be revisited in the light of the national and local economic downturn.

### **3. Issues raised by the abolition of the RSS**

- 3.1 Until the recent government announcement the Regional Spatial Strategy formed part of the development plan (see e.g. 4.31 of PPS12). Even the latest version of PPS3 Housing (published in June 2010) makes extensive reference to the role of the Regional Spatial Strategy in determining housing numbers (e.g. PPS3 June 2010 para 34 “*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.*”)
- 3.2 The abolition of the RSS poses a number of questions. As well as guiding the location and scale of development this also embodied the Regional Transport policy and other key policies. Also linked to the RSS was the Strategic Sustainability Assessment (SSA) process which combined the requirements of a sustainability appraisal under PPS 11, and a Strategic Environmental Assessment (SEA) under the European SEA Directive (see SW RSS with SoS changes, para 1.2.8, July 2008). The removal of the mechanism whereby the cumulative impacts of development across the region are assessed is surely a cause for some concern, especially as one of the reasons why the current RSS process in the South West had stalled was due to concerns regarding potential breaches of the Habitats Directive.
- 3.3 The large housing numbers proposed for Salisbury were specifically mentioned in the Habitats Regulations Assessment (HRA) of the RSS. (Proposed *Changes to South West RSS: Habitats Regulations Assessment Final Report*, Land Use Consultants in association with Levett-Therivel Sustainability Consultants, Final report, July 2008.) This says (para 3.9) that existing public water supply abstraction is already having a significant adverse effect on the interest features of the Avon special area of conservation (SAC) – before demand is increased by large RSS housing allocations in the housing management areas (HMAs) of Bournemouth and Poole, Swindon and Salisbury. And, in reference to the lower reaches of the Avon downstream from Salisbury the report concluded that it remains uncertain that “*increased pressure on sewage treatment works to serve new development will not result in adverse effects on the integrity of the Avon Valley SPA and Ramsar site*”. (para 4.7)
- 3.5 There are similar concerns in relation to the impact on the River Wylye, one of the five rivers feeding into the Avon system at Salisbury. The RSS for the HRA expressed concerns that RSS housing numbers in the Warminster area would have an adverse impact on the Wylye. Table 11.1 of the HRA report for the RSS listed the Avon SAC among “*sites for which uncertainty about adverse effects on integrity remain*”.
- 3.6 For most of its course from Warminster to Salisbury the A36 trunk road follows the Wylye Valley and increased traffic on this road would be expected to increase airborne emissions as well as increasing pollution of the Avon system though

sediment run-off. The HRA for the Core Strategy deferred consideration of the potential impact of traffic on the River Avon SAC due to the non-availability of relevant traffic data when that HRA was prepared (para 4.28 - 4.29 of SWCS HRA dated July 2009).

- 3.7 As is made clear in the HRA for the RSS (para 1.5) “... *HRA is based on a rigorous application of the precautionary principle and therefore requires those undertaking the exercise to prove that the plan will not have an adverse effect on the site’s integrity. Where uncertainty or doubt remains, an adverse impact should be assumed.*” There are uncertainties in both the HRA for the RSS and for the Core Strategy, so therefore it should be assumed that the large housing numbers proposed at Salisbury would lead to adverse impacts on the Avon SAC and Avon Valley SPA/Ramsar that would be in breach of European law.

#### **4. Soundness**

- 4.1 Given the points raised above, the removal of the RSS raises fundamental questions about the soundness of the South Wiltshire Core Strategy for many reasons including the following:
- There has been a lack of transparency and local community involvement in the way in which the figure of 12,400 houses has been arrived at in the RSS/CS.
  - The figure is based on economic growth predictions which are at odds with the current economic climate.
  - Government policy documents such as PPS3 and PPS12 still make extensive reference to the RSS. It is hard to see how these can be applied if the RSS is removed – what **is** the definition of soundness under these circumstances?
  - There is a lack of certainty that the level of housing dictated by the RSS across the SW region can be accommodated without causing environmental damage.

#### **5. Conclusion**

- 5.1 The opportunity needs to be taken to review local housing numbers and the distribution of development taking into account the wishes of the community and the current economic climate as well as constraints imposed by Salisbury’s unique environmental and landscape setting. A sustainable transport strategy needs to be considered as an integral part of this rethink and not as an optional add-on as has been the case thus far with the South Wiltshire Core Strategy.

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