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Dear Sir

SOUTH WILTSHIRE CORE STRATEGY

I write in response to the letter received from the Programme Officer seeking comments on the effect, if any, on the soundness of the South Wiltshire Core Strategy in light of the intention to abolish the South West Regional Spatial Strategy.

At the time of writing this letter, no further direction had been provided from the Coalition Government concerning the alternative approach to calculating housing requirement, or how this will be determined at the local level.

The question raised at the Examination in Public (Matter 1), concerned the 'weight' to be attached to the emerging RSS, given its advanced stage but not yet adopted. It was our view that significant weight should be afforded to the emerging RSS, a position shared by most participating at this hearing session, including the Local Authority. The question being asked now however, is whether the soundness of the Core Strategy will be affected by the abolition of the Regional Spatial Strategy.

Firstly, there was little disparity between the socio and economic requirements and preferred spatial strategy to deliver these requirements identified at the Local Level, when compared to that included within the emerging RSS. Both strategies sought to direct future residential and employment development to the City of Salisbury, and amend a recent trend of under supply of both market and affordable housing. Details of this local 'need' are set out within Section 3 of the submitted Core Strategy.

The requirements of the emerging RSS were not arbitrary, but based on a significant period of consultation and research, much of which is still relevant evidence. While PPS12 requires a Core Strategy to be in general conformity with the RSS, within the Salisbury HMA, the reality was that these 'regional' targets did not conflict with the quantum identified at the local level as being needed.

Turning to the specific matter of the 'soundness' of the Core Strategy with the RSS abolished, reference is made to the specific tests included within PPS12.

Consistent with National Policy

At the time of writing this letter, it remains our view that in general terms the Core Strategy remains consistent with National Policy. There has been no change to National Policy, which would render the content of the Core Strategy to be out of conformity, and while this is a matter for your judgement following the EiP, we do not consider this test of soundness has been prejudiced by the abolition of the Regional Spatial Strategy.

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Justified (robust and credible evidence base)

While others may question the credibility of the evidence base of the RSS and the process for this top down approach, the Core Strategy was not produced solely on the regional tier of research. Wiltshire Council produced a Core Strategy that was based upon a significant amount of locally derived evidence covering all matters such as housing and employment need, viability, environmental and landscape appraisals. Furthermore, unlike elsewhere within the South West, the emerging RSS did not impose site specific 'areas of search' within the Salisbury HMA; on the contrary, the chosen spatial strategy included within was based on evidence collated at the local level.

In our opinion, the Core Strategy would not fail this test of soundness in the absence of the emerging RSS. Without pre-empting your Report into the soundness of the Core Strategy, if the Council has successfully demonstrated that the Core Strategy is based on a robust and credible evidence base, then the abolition of the RSS should not affect this position.

Justified (most appropriate strategy when considered against the reasonable alternatives)

The 'strategy' adopted by the Council in forming the Core Strategy was subject to extensive local consultation over a number of years, where alternatives were tested and ultimately dismissed in favour of that contained within the submitted Core Strategy. Central to this strategy was the direction and delivery of new employment and residential development to the City of Salisbury, due to its dominant role within the HMA. While this mirrored the SSCT objectives contained within the RSS, it was in spatial planning terms by far the most appropriate strategy when compared against the alternatives and was a position shared by the Council at the EiP [Para 3.3, Wiltshire Council's Position Statement, Matter 2].

If the soundness of the Core Strategy was to be prejudiced, it would have to follow that in the absence of the SSCT Policy, the Council would not have directed the majority of development to Salisbury within its Core Strategy. In our opinion, the Council would still have adopted this spatial planning objective, given the dominance of the City within the HMA and the fact that the alternatives were assessed and subsequently dismissed.

Effective (deliverable)

Whether the submitted Core Strategy is deliverable or not was discussed at length at the EiP, and is a matter for judgement as part of your Report. We would argue that the Core Strategy objectives and spatial strategy were shown to be deliverable, and the abolition of the RSS would not prejudice this position.

Effective (flexible)

Without question, this test of soundness within PPS12 did not envisage the need for a Core Strategy to be flexible against the complete abolition of the Regional Spatial Strategies, however, it could be argued that it goes to the heart of what is currently being considered. The pertinent question is whether the Core Strategy is based purely on the guidance and requirements contained within the soon to be abolished RSS, or whether it has been derived from locally based needs assessment, endorsed by Members and in terms of its soundness, not conflict with the RSS. We would argue it is the latter, particularly given the lack of any site specific direction from the regional level and the quantum of development being supported through the Housing Needs Survey.

Housing delivery is often the most emotive issue, and therefore I have used this within my commentary. The strategy and quantum of development within the Core Strategy proposes a front loaded approach, to compensate for the low level of housing completions achieved over the past 10 years in South Wiltshire (Para 5.39 submitted Core Strategy). This approach of front loading housing delivery does not come from any RSS phasing (because there isn't one), but is a strategy compiled by Officers and agreed by Members to respond to the local need.

In terms of the quantum of development, the Core Strategy has identified a number of specific sites for residential and employment growth, but has also left for future consideration broad 'areas of search' around Salisbury, which may provide in the region of 1,000 dwellings, and where future work is required through a subsequent DPD to bring forward. This is considered a flexible approach for two reasons; firstly, through the identification of a number of specific sites the Council enhances the prospect of delivery, but is not reliant on any one development partner bringing forward its site in a timely manner, and secondly, should the numerical position change, it can reconsider the need to bring forward these areas or area of search, which are still to be fully tested.

We are yet to learn how the Secretary of State proposes to recalculate housing requirement in the absence of the RSS, who will be involved, or even what it will be based upon. That said, much has been made about reverting back to 'Option 1' or 'Tier 1' numbers as contained within the Draft Regional Spatial Strategies.

To address this specific option, for the Salisbury HMA, this would in theory mean a reduction from 12,400 dwellings, to 9,200 dwellings across the HMA, and 6,000 dwellings to 5,000 dwellings within the City of Salisbury. It does not follow however, that this would be the strategy adopted by Wiltshire Council given the pressing housing need that exists in the short term, and more so, in terms of the total quantum of residential development to be delivered to meet its socio and economic objectives in the long term.

While the wording of the Core Strategy makes specific reference to 12,400 dwellings, the document is not considered so inflexible to prejudice the delivery of any change to this quantum of residential development.

If Wiltshire Council chose in the absence of the RSS to seek to reduce its total housing requirement, it can do so with very little change to the submitted Core Strategy by dismissing the need to bring forward the area or areas of search currently required in the Core Strategy later in the Plan period. More so, we know that this South Wiltshire Core Strategy has been formed in advance of a Wiltshire-wide Core Strategy, which is in its infancy. The principal reason for continuing to adoption of the South Wiltshire Core Strategy was to address the significant shortfall of housing delivery over recent years and therefore to abandon this approach would significantly prejudice this position.

If these 'Option 1' numbers are not endorsed by the Coalition Government as being the new benchmark, but rather housing requirements should be derived from up to date local housing needs assessment, then it is certainly not beyond the realms of possibility that such a survey would show the need for a greater number of dwellings, both market and affordable, from that contained within the RSS.

The notion that abolishing RSSs automatically means less development is fundamentally flawed, particularly given the lack of house building that has occurred since these requirements were considered and set some three years ago. This of course is on the premise that Officers and Members at Wiltshire Council will want to meet the locally identified needs, but the continued position of the new administration is not one of restricting house building, but rather to counter the previous Government's failure to deliver housing and build more.

For the reasons given, we do not consider that the abolition of the RSS should or will have an effect on the soundness of the South Wiltshire Core Strategy. As drafted, the DPD is sufficiently flexible to deliver its short term objectives, which are based on locally derived assessments, while maintaining a strong spatial strategy for the former Salisbury District in advance of the Wiltshire Core Strategy.

While some will argue that the removal of the Regional Spatial Strategy should result in a reduction in housing and employment growth, it does not mean that there has been a reduction in need. On the contrary, the longer this period of uncertainty exists and in the absence of a Core Strategy deemed sound for South Wiltshire, the lack of investment and delivery of socio and economic objectives will be exacerbated.



Thank you for the opportunity to provide this opinion on the current situation, and I hope they will be of some use.

Yours faithfully

Chris Rees
Savills Planning & Regeneration