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JAS M9/0107-03

**By post and Email:**  
[ikemp@sky.com](mailto:ikemp@sky.com)

Dear Sir

**RE: WILTSHIRE COUNCIL – LOCAL DEVELOPMENT FRAMEWORK – SOUTH WILTSHIRE**

We represent the **South West RSL Planning Consortium** which includes all the leading Registered Social Landlords (RSLs) across the South West. Our clients' principal concerns are to optimise the provision of social/affordable housing and to ensure the evolution and preparation of consistent policies throughout the region.

We welcome the opportunity to comment on this specific issue.

We think it is important to note that it is merely the Government's intention to abolish the RSS. It has not yet done so and until it does, it is still Government policy. The intention to abolish is material, but PPS12 states that Core Strategies must conform to this document and this has not yet been amended. Furthermore the abolition of RSSs must go through Parliament and be enacted in to law. Notwithstanding the Government's intention, however strong, national planning policy and law has not been sufficiently amended to mean the emerging RSS can be ignored.

Furthermore, the emerging RSS still forms part of the development plan and the Coalition Government have not even set out what will replace it. No timeframe has been given for an announcement of a replacement system.

The delivery of housing to meet the needs of the population is foremost among the key strategic objectives for the planning system. Planning Policy Statement 3 (PPS3), paragraph 9 asserts that Government seeks to *'ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live.* Paragraph 25 of PPS3 continues that the *'Government's key objective is to provide a variety of high quality market housing. This includes addressing any shortfalls in the supply of market housing'.*

The Strategic Housing Market Assessment demonstrates very high demand for housing in the area and supports a housing target in line with the emerging RSS figure. PPS3, which was recently reissued by the

government, places a great emphasis on the need for strategic housing policies to be based on robust evidence. We consider paragraph 11 of PPS3 to be particularly pertinent. We have reproduced it full below:

*'11. PPS3 sets out policies designed to achieve these outcomes, based upon the following concepts and principles:*

*– Sustainable Development – PPS1 sets out the strategic role of planning in delivering sustainable development. Sustainability Appraisal is a key means of ensuring housing policies help to deliver sustainable development objectives, in particular, seeking to minimise environmental impact, taking account of climate change and flood risk.*

*– Visionary and Strategic Approach – Local Planning Authorities and Regional Planning Bodies will have a key role in defining and communicating the spatial vision for their area, determining their strategy for delivering the vision and joining up planning, housing and wider strategies including economic and community strategies. In accordance with the Local Government White Paper, **Local Planning Authorities should take a strategic lead role in their local area, ensuring that Local Development Documents provide a high quality framework for planning for housing delivery.***

*– Market Responsiveness – **Local Planning Authorities and Regional Planning Bodies should take into account market information when developing planning for housing policies.** In particular, they should have regard to housing market areas in developing their spatial plans and these should be set out in the Regional Spatial Strategy.*

*– Collaborative Working – Key to the success of this new approach will be collaborative working between Local Planning Authorities and Regional Planning Bodies, as well as early engagement with local communities, stakeholders and infrastructure providers. **Local Planning Authorities will need to work closely with the private sector, particularly developers and housebuilders, to achieve the Government's strategic housing objectives.***

*– Evidence-Based Policy Approach – **Local Development Documents and Regional Spatial Strategies policies should be informed by a robust, shared evidence base, in particular, of housing need and demand, through a Strategic Housing Market Assessment and land availability,** through a Strategic Housing Land Availability Assessment.*

*– Outcome and Delivery Focus – Applying the principles of 'Plan, Monitor, Manage', Local Planning Authorities and Regional Planning Bodies should focus, as a priority, on managing the delivery of the key outcomes set out in paragraph.'*

[My emphasis added]

Even with the removal of references to Regional Planning Bodies and the RSS, it is still clear that Local Development Plan Document need to be based on evidence and demand in the market to deliver housing.

In Paragraph 33 of PPS3 it states that local housing provision should be based on the Strategic Housing Market Assessment.

We also consider that the recent speech made by Andrew Stunell OBE MP (Parliamentary Under Secretary of State, CLG, whose responsibilities include housing and regeneration) made to the house of Commons on 8 June. This underlines the Government's commitment to building more homes. Below is a quote from Hansard:

*'On housing supply, my hon. Friend seemed to suggest that the changes that we were making were intended to produce fewer homes. That is not the case at all. We want homes in the right places, and our view is quite clear: we have not built enough homes. Indeed, this year, house building is at its lowest level since 1946 or, if one discounts the war, since 1923. There is a huge gap between supply and demand, and it is the Government's policy to address that. The long-term demand for housing is strong, even if, as he rightly says, it is at the moment a little hard to make that market work properly.'*

The emerging RSS is also based on the most up-to-date demographic data and the research that has gone in to it should not be dismissed lightly.

We look forward to reading the Inspector's Report in to the Core Strategy

Yours faithfully



**JAMIE SULLIVAN**  
For and On Behalf Of  
TETLOW KING PLANNING

cc: Green Square Group  
Guinness Trust  
Knightstone Housing Association  
Jephson Housing Association  
Spectrum Housing Group

Somer Community Housing Trust  
Sovereign Housing Association  
Synergy Housing Group  
Raglan Housing Association  
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Steve May  
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