

**Agenda item 7: Submission of Wiltshire Core Strategy and Review of Local Development Scheme**

**STATEMENT ON BEHALF OF PERSIMMON HOMES (SOUTH COAST) LTD.**

Councillors will recall that, at the last extraordinary meeting of this Council in February 2012, it was resolved to adopt the South Wiltshire Core Strategy as part of the statutory development plan for Wiltshire in accordance with the changes identified in the Inspector's Report.

It has been the consistent position of this authority that, given the lengthy period of preparation, consultation and examination of the South Wiltshire Core Strategy over a period of about 5 years, the new Wiltshire-wide Core Strategy should incorporate policies for South Wiltshire without fundamental change. Paragraphs 1.11 – 1.12 of the Submission Draft Wiltshire Core Strategy clarify this relationship, highlighting that it would be inappropriate to deviate from the Inspector's recent recommendations.

However, the policies of Submission Draft Wiltshire Core Strategy do not accurately reflect policies from the South Wiltshire Core Strategy, and we would draw attention to Core Policy 24 (the Spatial Strategy for the Southern Wiltshire Community Area), which includes a target of 190 homes at Downton over the plan period. The specific inaccuracy to which we refer is the omission of the words "at least" from that target; words that were expressly recommended by the previous Inspector under REX/04. Paragraph 50 of the Inspector's report explains that, amongst other changes required to make the plan sound, these words should be added in order that targets are "a floor not a ceiling".

During the public consultation on the Submission Draft Wiltshire Core Strategy held earlier this year, Persimmon submitted written representations urging officers to amend the wording of Core Policy 24 in order to reflect the previous Inspector's recommendations, and officers have subsequently indicated in discussions that references to "at least" would be restored. However, having reviewed Appendix 1 to this agenda item (setting out pre-submission changes in light of the recent consultation) we notice that the opportunity has not been taken to correct the wording.

Proposed change 16 would introduce supporting text to the plan to suggest that growth beyond stated targets would be possible under some circumstances. However, this does not accurately reflect the Inspector's recommendations that not only should 555 homes be regarded as the minimum for the Southern Wiltshire Community Area as a whole; but within that figure, 190 homes must be the minimum for Downton. Aside from this we would note that it is a well-established principle of the planning system that supporting text in Development Plan Documents is accorded lesser weight than policies themselves.

For these reasons we are concerned that the draft Wiltshire Core Strategy will be submitted to the Secretary of State without fully reflecting the previous Inspector's recommendations, and hence it could well fail to meet the "tests of soundness" to which it will be subjected under Examination. Persimmon would certainly appear at the Examination in Public to argue this point if the matter is not rectified now, and would therefore suggest that the opportunity is taken to make the comparatively small change of wording to Core Policy 24, through the reinstatement of the words "at least" before Downton's housing target, in order to reduce these possibilities.