31 October 2012

Dear Mr Hollox,

I refer to your letter of 26 September 2012 regarding Salford’s Core Strategy, and your preliminary conclusions, which as you would expect we have taken very seriously. You have been very clear that it is for the City Council to decide the best way forward having considered the points you raise, and I promised that I would set out our intentions by the end of October.

The first three weeks of examination hearings raised a whole series of issues, and as a result you have concluded that the Core Strategy should plan for more residential and economic development than the City Council intended in the plan it put forward.

In order to address your concerns relating to the supply of new housing, our initial assessment is that an increase from an average of at least 1,300 net dwellings per annum to an average of at least 1,600 net dwellings per annum would require the development of significant areas of greenfield land, and most likely some green belt land. This is particularly so given your conclusion that there should be a 20% buffer to deal with what you see as consistent under-performance against the RS figure. You have asked us to give further consideration to the urban areas of the city to find further opportunities for house building, and you have referred to specific areas. We will certainly re-examine these areas and more, as you would expect, but our assessment at this stage is that the potential to further increase the supply in this way is limited. Indeed, the concerns expressed in paragraph 9 of your letter, in relation to the level of certainty over the potential contribution of existing employment sites to the supply of new housing, means that the scale of housing identified for some parts of the urban area may actually need to be reduced.

At the examination, and in response to one of your questions, we identified how we might identify a further supply to meet a requirement of 1600 homes/annum, but this clearly did not take account of any potential 20% buffer, nor did it assume a reduced expectation of housing coming forward on land currently in employment use.
In relation to the supply of land for industry and warehousing, our initial assessment is that any significant increase would be likely to require the development of green belt land, and indeed you heard a full day’s debate about the proposal to extend the Port Salford proposals although you are silent on this in your letter. The difficulties in identifying additional land for economic development are exacerbated by the scale of housing development that needs to be accommodated.

In light of these challenges, the city council would be concerned about the appropriateness of seeking to bring forward modifications through the public examination process to address the issues raised in your letter. The necessary modifications would be likely to mark a significant change in the overall approach compared to that set out in the Publication Core Strategy, and whilst we might argue that this should not imperil the soundness of the plan we are uncertain how you might view this in terms of your own conclusions.

The existing strategy proposed by the city council is the result of extensive public consultation, and it is considered that a similar level of stakeholder involvement is required in determining any significantly amended strategy. It would seem unlikely that this could be achieved during a suspension of the current examination. Furthermore, even if the city council sought to bring forward modifications through the examination process, as you note in paragraph 10 of your letter, there is no guarantee that this would result in you finding the Core Strategy sound. We perfectly understand that until you have considered all the work that we have undertaken during a suspension period, the responses to further consultation, and the way forward we might propose on the basis of all the evidence, that you can give us no advice on whether the end result will be sound in your terms.

We are therefore having to make a judgement now on where this could all lead us, and to consider what the options are for the City Council in proceeding. For example, in paragraph 4 of your letter you refer to a number of locations that we may wish to consider in terms of providing additional land for housing. In practice, it will be important that we fully assess all options for increasing the supply of housing right across the city. This will include the western side of the city as well as within the urban areas.

As a result of these considerations we are taking a view, given your preliminary conclusions and how these might be best dealt with, that the best way forward will be for the City Mayor to recommend to a meeting of full council on Wednesday 21 November 2012 that the Publication Core Strategy should be withdrawn, and that work should commence immediately on a new Local Plan. This would also deal with allocations, so removing the need for an Allocations DPD, and saving time and cost overall. Clearly in proceeding in this way we will be mindful of your conclusions, and indeed that for a significant period Salford will be moving forward without a plan of its own in place. This is a situation we would have wished very much to avoid, but which we believe must now be seriously considered.
I will write to you again immediately following the meeting of full Council to confirm the position, which is necessarily provisional until that decision is made. If in the meantime you have any further information or views to inform our way forward, they will of course be very welcome.

Yours sincerely

Chris Findley
Assistant Director Planning and Transport Futures