

Wiltshire Council

Cabinet

30 April 2019

Subject: Wiltshire Local Plan Review Update: Strategy Development

Cabinet Member: Councillor Toby Sturgis - Spatial Planning, Development Management and Property

Key Decision: Key

Executive Summary

Cabinet on 10 October 2017 approved the scope and content of an initial consultation on the Wiltshire Local Plan Review. The consultation included publication of the Swindon and Wiltshire Strategic Housing Market Assessment (SHMA) and Swindon and Wiltshire Functional Economic Market Area Assessment (FEMAA) to inform the review, as first reported to Cabinet on 12 September 2017.

In November 2017 the scope of the plan consultation took place in accordance with the approved LDS as reported to Cabinet on 26 March 2019. In October 2018, further informal consultation took place in relation to the main towns in Wiltshire and rural areas. The purpose was to discuss with town and parish councils and representatives of neighbourhood plan steering groups what an appropriate scale of growth could be for each main town over the period 2016 - 2036 and to consider planning for housing in the rural areas.

As reported to Cabinet on 26 March 2019, the Government have issued revisions to the National Planning Policy Framework (NPPF), which has implications for plan making in Wiltshire. This report therefore brings together the outcomes of the consultations in 2017 and 2018 and revisions to national policy and guidance. It sets out next steps for the review of the Wiltshire Local Plan in relation to the development strategy and identifies a range of housing growth for Wiltshire over the period 2016 to 2036 to be tested. It identifies alternative development strategies for different distributions of employment and housing growth by housing market area to be considered through the plan-making process to develop a preferred strategy.

Maintaining an up-to-date development plan in accordance with the NPPF will support plan led growth across the county safeguarding Wiltshire from speculative and unplanned development, which does not support sustainable and resilient communities.

The local plan review process will continue to involve Wiltshire's community and other stakeholders in the early stages of plan making.

Proposals

That Cabinet:

- (i) Endorse a housing range of between 40,840 and 45,600 homes as the basis to test and then inform an appropriate local plan housing requirement for Wiltshire for the period 2016 to 2036.
- (ii) Agree that the alternative development strategies identified for the Chippenham Housing Market Area, Salisbury Housing Market Area, Swindon Housing Market Area (Wiltshire part) and Trowbridge Housing Market Area are an appropriate basis for further assessment for the purpose of testing the upper end of the proposed housing range and develop a preferred strategy for the plan.

Reason for Proposals

To ensure that progress continues to be made on maintaining an up-to-date development plan for Wiltshire in line with revised national policy (NPPF, February 2019).

The NPPF requires local planning authorities to keep their Local Housing Need under review as new data becomes available and confirms that the local plan housing requirement is not set until the plan is submitted to the Secretary of State for Examination. It is therefore important to adopt a flexible approach to calculating the plan's housing requirement as part of the plan making process to respond to future data if necessary.

Alistair Cunningham

Executive Director for Growth, Investment and Place

Wiltshire Council

Cabinet

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Cabinet Member: Councillor Toby Sturgis - Spatial Planning, Development Management and Property

Key Decision: Key

Purpose of Report

1. The purpose of the report is to:
 - (i) to set out the next stage of plan making in the light of the changes to national policy and the outcome of consultations; and
 - (ii) agree the appropriate scale of housing growth to be tested for Wiltshire and the alternative development strategies to be considered through the plan-making process to inform a preferred strategy.

Relevance to the Council's Business Plan

2. The Business Plan 2017-2027 'Forward Thinking' seeks to create strong communities in Wiltshire. One of the four priorities, 'Growing the Economy', recognises the importance of job creation and improving housing supply to enable people to live and work locally. Delivering development where it is needed forms one of the goals of the Business Plan. Goals will be supported by the timely review of the Wiltshire Local Plan to ensure planning policies support sustainable development and resilient communities.

Background

3. Cabinet at its meeting on 10 October 2017 approved the initial Regulation 18¹ consultation on the proposed scope and content of the Local Plan Review. The consultation included publication of the Swindon and Wiltshire Strategic Housing Market Assessment (SHMA) and Swindon and Wiltshire Functional Economic Market Area Assessment (FEMAA) to inform the review, as first reported to Cabinet on 12 September 2017. Reports on the consultation are available on the web site (see <http://www.wiltshire.gov.uk/planning-policy-local-plan-review> under Issues

¹ Regulation 18, Town and Country Planning (Local Planning) (England) Regulations 2012: Consultation on the Scope of the Plan

Consultation). Initial findings from the consultation were reported to Cabinet on 26 March 2019.

4. Further informal consultation took place in relation to the main towns and rural areas during October and November 2018 (Member Briefing Note 368 refers). The purpose was to discuss with town and parish councils where growth could take place and what could be an appropriate scale. Rural based workshops discussed how the local plan could support delivery of new homes to meet local housing need and support neighbourhood plans. In total, five town-based workshops and two rural workshops were held. A report of these meetings is available on the Council's website (<http://www.wiltshire.gov.uk/planning-policy-local-plan-review> under Issues Consultation). The key message from the town-based workshops was that growth should be supported by appropriate infrastructure. In certain towns specific infrastructure was discussed, for example, a bypass in relation to Melksham.
5. Cabinet on 26 March 2019 (report on Wiltshire Local Plan Review Update) considered the implications for plan making, arising from the revisions to the NPPF published in July 2018 and subsequently February 2019². This included information on estimating local housing need and, in referring to a similar report considered by Swindon Borough Council at its Cabinet meeting of [20 March 2019](#), indicated that it is likely that Swindon Borough's housing need can be met within the Borough.
6. Cabinet on 26 March 2019 also agreed the extent of the proposed Chippenham Housing Market Area, Salisbury Housing Market Area, Swindon Housing Market Area (Wiltshire part) and Trowbridge Housing Market Area (as amended), as set out in **Appendix 1**, and that they were an appropriate basis for housing distribution within Wiltshire and should inform the development of a preferred development strategy for the Local Plan.
7. This report considers the development of alternative development strategies for each housing market area, which have been informed by the outcome of the 2017 and 2018. These are based on work that has now been undertaken on estimating housing need, as well as evidence in the FEMAAs on need for employment land.

Main Considerations for the Council

Estimating housing need

8. The NPPF at paragraph 60 states that: *"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in*

² <https://www.gov.uk/government/consultations/changes-to-planning-policy-and-guidance-including-the-standard-method-for-assessing-local-housing-need>
<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

national planning guidance". The result of the standard method is, therefore, the starting point for plan making and represents the minimum number of homes needed in the local authority area. Based on the latest Government position, 40,840 homes would be the minimum local housing need for Wiltshire for the period 2016 to 2036. This calculation is set out in **Appendix 2**.

9. National policy and advice also indicate that local planning authorities (sometimes referred to as strategic policy-making authorities) should keep their local housing needs assessment under review as new, more up-to-date data becomes available. Planning practice guidance (PPG) states:

"The housing need figure generated using the standard method may change as the inputs are variable and this should be taken into consideration by strategic policy-making authorities. However, local housing need calculated using the standard method may be relied upon for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination".

(Paragraph: 008 Reference ID: 2a-008-20190220)

This is an important consideration as until the plan is submitted to the Secretary of State for examination it will need to respond to changes in information. For example, affordability ratios are published every year and household projections every two years which means the current minimum local housing need assessment will change before the plan is submitted in late 2020. It is possible that both factors will contribute towards an upward trajectory for housing need in Wiltshire (**Appendix 3**) and, as reported to Cabinet in March, it is the Government's intention to change the standard method before the plan is submitted. As local planning authority it is prudent, therefore, to consider the level of housing as part of the plan making process in the form of a range in anticipation of change.

10. In addition to the above, PPG considers when a local housing need figure higher than the standard method may be appropriate³. The 26 March Cabinet report considered this advice (paragraphs 19-22) and officers committed to reporting back on ongoing work.
11. That work is now complete and included at **Appendix 2**. It provides further information about the standard methodology, how it applies to Wiltshire and provides an example of how local evidence can influence housing distribution at the HMA level. It suggests that a figure for local housing needs could take into consideration longer term migration trends and the anticipated growth in the number of jobs within the county. The analysis suggests that, to support jobs in the county, the local housing need could rise to 45,600 homes for the period 2016-2036, which compares to the Core Strategy housing requirement of 42,000 homes for the period 2006-2026. The data is summarised in Table 1 below together with the 2017 SHMA figures.

³ Planning Practice Guidance ID 2a-010-20190220

Table 1: Estimates of Wiltshire’s Local Housing Need

	Wiltshire Core Strategy (2006-2026)	2017 SHMA (2016-2036)	Government Standard Method (2016-2036)	2019 SHMA review (2016-2036)
WILTSHIRE UA	42,000	44,000	40,840	45,600
CHIPPENHAM HMA	14,400	22,250	13,630	20,390
SALISBURY HMA	12,000	8,250	12,230	10,975
SWINDON HMA (part)	3,800	0	4,480	3,260
TROWBRIDGE HMA	11,800	13,500	10,500	10,995

* Figures may not add due to rounding

12. Evidence therefore suggests at this stage the Wiltshire Local Plan Review should consider and test a range of local housing needs from 40,840 to 45,600 homes for the period 2016 to 2036. At this stage this is not the local plan housing requirement. Subsequent stages of plan making will need to test alternative strategies to accommodate these needs and consider: deliverability, the need for flexibility, choice and contingency, as well as land availability, environmental constraints and infrastructure requirements. Only once this testing is complete can a local plan housing requirement be determined.
13. Given the uncertainty surrounding an appropriate local plan housing requirement for the period 2016-2036 it is proposed that a range of between 40,840 and 45,600 informs strategy development for the plan. In the first instance, testing the deliverability of the higher number in the range to provide contingency to respond to potential changes to the minimum local housing need over the next two years should be undertaken.

Disaggregating housing needs and employment land to HMAs

14. The NPPF requires that “*Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.*” (Paragraph 65).
15. As agreed at the March Cabinet, the revised HMAs identified at **Appendix 1** form the appropriate basis for disaggregating housing requirements within Wiltshire. The appropriate scale of housing to be tested in each HMA (at the higher end of the range) is set out in the final column provided in Table 1, above.
16. To understand the potential impact of this level of growth on the county it is important to first discount from the figure completions between 1 April 2016 to 31 March 2018, current commitments in the form of outstanding planning permissions and allocations in the development plan at 1 April

2018. At a Wiltshire level it is estimated that there would be a residual housing need to plan for of about 18,000 new homes based on the top end of the of the range of 45,600 homes for the period 2016-2036. It is anticipated at this stage that this level of new housing can be accommodated within the administrative boundary of Wiltshire.

Table 2: Estimate of Wiltshire’s Housing Land Supply, April 2018⁴

	Dwellings
Completions 2016-2018	5,752
Planning permissions (2018) ⁵	12,595
Plan allocations (2018) ⁶	9,220
TOTAL	27,565

17. In terms of employment land, the Swindon and Wiltshire Functional Economic Market Area Assessment (FEMAA) supported by the Wiltshire Employment Land Review 2017 forms the basis for disaggregating the need for employment land in the county. Table 3 below provides an estimate of the employment land need in each housing market area and provides an indication of the residual amount of land required to meet this. Figure 1 illustrates how the HMAs relate to the Functional Economic Market Areas.
18. At this stage in the plan process this is a quantitative assessment and assumes all current planning permissions and employment land allocations will be brought forward as employment land. The Employment Land Review 2017 also carried out a qualitative assessment of current employment sites which needs to be taken into account. The plan process will also need to consider the provision of choice in terms of location, size and type of employment land attractive to the market and land availability.

⁴ Data based on provisional information in the council’s monitoring system. Final figures will be confirmed on publication of the 2018 Housing Land Supply Statement

⁵ This includes sites with planning permission, permission in principle or prior approval and sites with resolutions to grant planning permission subject to a Section 106 agreement.

⁶ This includes saved Local Plan allocations (that have been reviewed and carried forward as part of the Wiltshire Core Strategy), Strategic Sites within the adopted Wiltshire Core Strategy, Site Allocations within the adopted Chippenham Site Allocations Plan (May 2017), Proposed Site Allocations within the emerging Wiltshire Housing Site Allocations Plan (Pre-submission Draft June 2017 as amended by Proposed Modifications September 2018), Made (i.e. Adopted) Neighbourhood Plan allocations, Emerging Neighbourhood Plan allocations (where the Neighbourhood Plan has reached the formal Regulation 16 consultation stage).

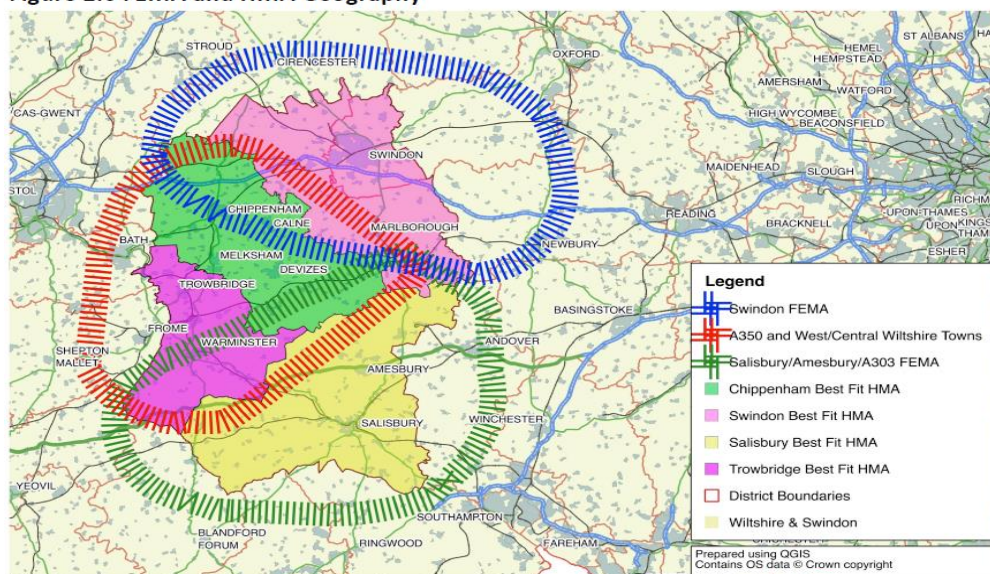
Table 3: Estimate of Wiltshire’s Employment Land Need, April 2018 (based on a roll forward of Wiltshire Core Strategy)

	FEMAA	Need (Ha.)	Residual * (Ha.)
WILTSHIRE		182	26
Chippenham HMA	A350/West Wiltshire FEMAA (part) and M4/Swindon FEMAA (part)	61	9
Salisbury HMA	A303/Salisbury FEMA	60	10
Swindon HMA (part)	M4/Swindon FEMAA (part)	11	6
Trowbridge HMA	A350/West Wiltshire FEMAA (part)	50	1

* Amount of land to be allocated once current commitments and completions since 2016 have been taken into account

Figure 1 Illustration of FEMAA geography and HMA geography

Figure 2.6 FEMA and HMA Geography



Disaggregating HMA needs to Principal Settlement, Market Towns and Rest of HMA (rural area)

- The starting point for the assessment for disaggregating HMA needs was to test a straightforward proportionate roll forward of the core strategy distribution. This has then been used as a basis for identifying alternative development strategies. Initial assessments were discussed at the workshops with parish councils and representatives of neighbourhood planning groups (Autumn 2018), which took into consideration the 2017 consultation (e.g. where it highlighted that an alternative to the core

strategy distribution is needed to respond to new issues and opportunities).

20. **Appendices 4 to 7** summarise the assessment methodology and proposed alternative development strategies for each HMA. They demonstrate how the HMA figures for housing and employment could be distributed at Principal Settlement, Market Town and rural area level for each HMA. The proposed alternative development strategies by HMA are summarised below, together with the initial findings of a Sustainability Appraisal that is being undertaken. **Appendix 8** provides a summary of the range of housing proposed to be tested in the alternative development strategies for each Principal Settlement, Market Town and rural part of a HMA.
21. In relation to the **Chippenham HMA** the recent review of housing need (referred to as the SHMA 2019 review (**Appendix 2**)) proposes a 45% increase in the number of homes compared to the Wiltshire Core Strategy - a significant increase.
22. Data from the Swindon and Wiltshire FEMAA and the Wiltshire Employment Land Review indicates that about 61 ha of available employment land is needed in the Chippenham HMA. Given the amount of employment land built since 2016, with planning permission or allocated in the development plan there is a residual to identify of about 9 hectares. The Employment Land Review also states:

“In the A350 FEMA there is sufficient availability of sites to meet overall demand during the first five-year period of the plan. However, over the full Local Plan period, demand and supply are finely balanced, so new allocations may be needed. There are strong drivers of growth in Chippenham in particular, which is attractive to the market and is a principal town in the Local Plan, so existing sites should be protected and new allocations considered here. There is also a strong case for new allocations in Melksham and Corsham.”⁷
23. The evidence indicates (**Appendix 4**) that Calne, Corsham, Devizes and Malmesbury have constraints which suggest that proportionately lower housing growth should be considered compared to rolling forward the core strategy. In contrast, there are economic prospects at Chippenham and Melksham where the potential for environmental harm is less. Taking into consideration these conclusions and the discussions that took place in the Chippenham HMA workshops it is proposed that the following development strategies for the Chippenham HMA should be tested further:

Chippenham Housing Market Area - Alternative Strategies
<i>Chippenham A (CH-A) - Roll forward the core strategy</i>

⁷ Section 7.2.1. in the [Employment Land Review 2017](#)

Housing and employment land requirements are increased by 45% and distributed pro-rata to roll forward the current strategy.

New employment allocations proposed only at Calne, Corsham and Melksham.

Chippenham B (CH-B) - Chippenham Expanded Community

More constrained settlements (Corsham, Calne, Devizes and Malmesbury) continue at Core Strategy rates of growth. Chippenham receives the balance (from about 6,500 homes in CH-A to about 10,000 homes).

New employment allocations proposed only at Chippenham and Calne.

Chippenham C (CH-C) - Melksham Focus

Housing requirements based on economic forecast for Melksham and follow a recent track record of sustained economic growth (for housing this means from about 3,000 homes in CH-A to about 4,000 homes). The strategy diverts the scale of new housing away from settlements that are more environmentally constrained or sensitive.

New employment land proposed only at Melksham and Corsham.

24. An initial Sustainability Appraisal suggests that strategy CH-A, roll forward of the core strategy is emerging as the least preferred option as it continues to direct growth at the more environmentally constrained towns. It also suggests that there are marginal differences between the strategies focused on Chippenham (CH-B) and Melksham (CH-C) as these enable reduced scales of growth at the more sensitive and environmentally constrained locations of Calne, Corsham, Devizes and Malmesbury.
25. Even though strategy CH-B is one of the more favoured strategy options at this stage, the scale of growth in this option poses a risk to biodiversity at Chippenham due to the likelihood of additional infrastructure development which may lead to habitat fragmentation.
26. In relation to the **Salisbury HMA**, the SHMA 2019 review suggests an overall reduction in the number of homes required within the HMA, which is 11% lower than that proposed in the Wiltshire Core Strategy. Much of the need for new homes in this HMA will be met by the current supply of identified land. This however may not be appropriate. For example, sites in the current land supply may have become unsuitable or the location of sites for housing may need to better match the strong housing demand in Salisbury which supports the local economy
27. Data from the Swindon and Wiltshire FEMAA and the Wiltshire Employment Land Review indicates that about 60 ha of available employment land is needed in the Salisbury HMA. Given the amount of employment land built since 2016, with planning permission or allocated in

the development plan there is a residual to identify of about 10 hectares. The Employment Land Review 2017 states:

“In the A303/Salisbury FEMA there is likely to be a shortfall of supply to meet forecast demand over the whole Local Plan period, although not during the first five years of this period. New allocations should be considered in and around Salisbury, which is a principal town in the Local Plan. If proposals to move businesses out of the Churchfields industrial area to allow residential development are pursued, then additional employment land allocations will be needed in and around Salisbury to accommodate these businesses.”⁸

28. The evidence indicates (**Appendix 5**) that Amesbury and Tidworth/Ludgershall should accommodate proportionately lower growth compared to rolling forward the core strategy. In contrast, there are economic prospects at Salisbury and in the rest of the HMA which suggest higher growth may be appropriate. These economic prospects were reflected in consultation responses and related to:
- (i) supporting the strong economic performance of business clusters in the area;
 - (ii) economic growth and growth in jobs is forecast to outpace population change raising concerns that local labour supply will be insufficient; and
 - (iii) net in-commuting to the area from elsewhere in the County.
29. Taking into consideration the conclusions emerging from the evidence, consultation and the discussions that took place at the Salisbury HMA workshop with town and parish councils, it is proposed that the following development strategies for the Salisbury HMA should be tested further:

Salisbury Housing Market Area - Alternative Strategies
<p><i>Salisbury A (SA-A) - Roll forward the core strategy</i></p> <p>Housing and employment land requirements are reduced by 11% and distributed pro-rata rolling forward the current strategy.</p> <p>New employment land proposed only at Salisbury/Wilton and Tidworth/Ludgershall.</p>
<p><i>Salisbury B (SA-B) - Focus on Salisbury</i></p> <p>Scales of housing development at Amesbury, Tidworth and Ludgershall are constrained to around current levels of commitments. The residual need is met at Salisbury (from about 5,000 homes in SA-A to about 6,000 homes).</p> <p>New employment land proposed only at Salisbury.</p>

⁸ Section 7.2.1. in the [Employment Land Review 2017](#)

Salisbury C (SA-C) - Focus on the rest of the HMA

Growth at Salisbury, Amesbury and Tidworth and Ludgershall constrained to around current levels of commitments. Remaining balance of housing needs focussed on the rural area.

For employment, the rest of the HMA accommodates growth which follows development trends for small scale employment growth in the rural parts of the HMA.

Salisbury D (SA-D) - Boscombe/Porton New Community

Housing at Salisbury, Amesbury and Tidworth/Ludgershall is constrained to current levels of commitments. Recognises that employment growth has taken place in the Boscombe and Porton area and directs housing growth to a new community related to this economic potential.

New employment land proposed only at Boscombe and/or Porton.

30. An initial Sustainability Appraisal suggests rolling forward the core strategy is the least preferred option (SA-A). It also suggests that, on balance, there is a marginal difference between the other strategy options although there are significant differences within the assessment. For example, the strategy which focuses on Salisbury (SA-B) raises concerns about landscape and heritage issues while the New Community option (SA-D) raises concerns about transport and resilient communities (education and health).
31. Co-operation with neighbouring authorities highlights a degree of overlap with housing markets in neighbouring areas in the south of the county, which may also need to be taken into consideration in the Salisbury HMA.
32. In relation to the **Swindon HMA** (Wiltshire part) the SHMA 2019 review proposed a 16% decrease in the number of homes compared to the Wiltshire Core Strategy. For the purpose of testing strategy options within the Swindon HMA, as set out in paragraph 6, it is assumed that the area will not accommodate any of Swindon's local housing need. Regardless of this position, as an allowance was made in the core strategy for housing at West of Swindon (Core Policy 2, Wiltshire Core Strategy) this location is included in the discussion of strategy options for testing at this stage.
33. Data from the Swindon and Wiltshire FEMAA and the Wiltshire Employment Land Review indicates that about 11 ha of available employment land is needed in the Swindon (Wiltshire part) HMA. Given the amount of employment land built since 2016, with planning permission or allocated in the development plan there is a residual to identify of about 6 hectares. The Employment Land Review 2017 states:

“There is an immediate need for new allocations in the Wiltshire part of the M4/Swindon (Wiltshire) FEMA. Within the current five-year period there is a forecast under-supply of around 4 Ha of employment land in this FEMA. Over the full Local Plan period there is a forecast shortfall of up to 8 Ha. Marlborough currently does not have any employment land available. Allocation of a site to allow for replacement and growth here would be helpful.”⁹

34. The evidence indicates (**Appendix 6**) that Marlborough has constraints which suggests that proportionately lower housing growth should be considered compared to rolling forward the core strategy. In contrast, the need for infrastructure investment and affordable housing suggest potential for a higher rate of growth at Royal Wootton Bassett. It would also, however, be appropriate to test how appropriate it would be for the town to undergo a period of consolidation. Evidence also suggests that house building rates in the rest of the HMA have been higher than anticipated in the core strategy. Based on work undertaken by Swindon Borough Council, as referred to in paragraph 6, the evidence currently indicates that there is no need to plan to meet Swindon Borough’s housing needs at West of Swindon, as such this has not been rolled forward in strategy options other than that for the roll forward of the core strategy. However, it is not clear at this stage whether there will be the need to accommodate employment growth at Swindon within Wiltshire.
35. Taking into consideration these conclusions and the discussions that took place at the Swindon HMA workshops with town and parish councils it is proposed that the following development strategies for the Swindon HMA (Wiltshire part) should be tested further:

Swindon Housing Market Area (Wiltshire part) - Alternative Strategies
<p><i>Swindon A (SW-A) - Roll forward the core strategy</i></p> <p>Housing and employment land requirements are reduced by 16% and distributed pro-rata rolling forward the current strategy.</p>
<p><i>Swindon B (SW-B) - Focus on Royal Wootton Bassett</i></p> <p>Development is constrained at Marlborough to current commitments. No further development beyond existing commitments west of Swindon. The balance is focussed on Royal Wootton Bassett (from about 900 homes in SW-A to about 1,300 homes).</p> <p>New employment land proposed only at Royal Wootton Bassett.</p>
<p><i>Swindon C (SW-C) - Focus on the rest of the HMA</i></p> <p>Growth in the rural area is set to levels achieved 2006-2016. Development is constrained at Marlborough to current commitments and</p>

⁹ Section 7.2.1. in the [Employment Land Review 2017](#)

reduced at Royal Wootton Bassett. No further development beyond existing commitments west of Swindon.

New employment land only proposed at Marlborough and rest of the HMA.

36. An initial Sustainability Appraisal suggests the option which focuses growth on the rest of the HMA (SW-C) is least preferred with concerns relating to dispersed landscape, heritage and transport impacts. A focus on Royal Wootton Bassett (SW-B) is the emerging preferred option although concerns in relation to resilient communities (education and health) remain. Affordability and need for jobs remain concerns in relation to Marlborough in options SW-A and SW-B.
37. In relation to the **Trowbridge HMA** the SHMA 2019 review proposes a 4% decrease in the number of homes compared to the Wiltshire Core Strategy.
38. Data from the Swindon and Wiltshire FEMAA and the Wiltshire Employment Land Review indicates that about 50 ha of available employment land is needed in the Trowbridge HMA. Given the amount of employment land built since 2016, with planning permission or allocated in the development plan there is a residual to identify of about 1 hectare. The Employment Land Review 2017 notes (at paragraph 7.4) that the Council should look to allocate more employment land at Trowbridge. The Employment Land Review scenarios vary as to the demand for new premises, but the study notes there may be a lack of demand because supply is not materialising at the town. This will need further consideration through plan making. The Employment Land Review notes the recent activity at Hawkeridge Business Park, Westbury.
39. The evidence indicates (**Appendix 6**) that Bradford on Avon, Trowbridge and Warminster have constraints which suggest proportionately lower growth should be considered compared to rolling forward the core strategy. In contrast, there are economic prospects at Westbury where the potential for environmental harm is less. Evidence also suggests that house building rates in the rest of the HMA have been higher than anticipated in the core strategy. Taking into consideration these conclusions and the discussions that took place at the Trowbridge HMA workshops with town and parish councils it is therefore proposed that the following development strategies for the Trowbridge HMA should be tested further:

Trowbridge Housing Market Area - Alternative Strategies

Trowbridge A (TR-A) - Roll forward the core strategy

Housing and employment land requirements are decreased by 4% and distributed pro-rata rolling forward the current strategy.

Trowbridge B (TR-B) - Westbury Growth Point

Housing requirements for Westbury are led by employment forecasts (from about 1230 to about 2100 homes). Consequential reductions to reflect existing commitments are focussed on Bradford on Avon and Trowbridge.

New employment land proposed only at Westbury.

Trowbridge C (TR-C) - Focus on the rest of the HMA

Housing requirements for the rest of the HMA are aligned to actual rates of past house building (from about 640 to about 1200 homes). Housing requirements are lower than TR-A at Trowbridge and Bradford on Avon as a result.

New employment land proposed only in the rest of the HMA.

40. The initial Sustainability Appraisal suggests significant adverse effects for all strategies in relation to biodiversity and healthy and inclusive communities. However, a focus on the rest of the HMA (TR-C) is emerging as the least preferred option with concerns relating to landscape and transport impacts and the ability to deliver affordable housing. On balance there are marginal differences between rolling forward the core strategy (TR-A) and Westbury Growth Point (TR-B) although concerns remain in relation to air quality, flood risk and settlement resilience in relation to Westbury Growth Point (TR-B).
41. The initial Sustainability Appraisal suggests that an alternative strategy which facilitates a reduced scale of growth at the more sensitive and environmentally constrained locations of Bradford on Avon and Warminster (as per TR-3) and a reduction at Trowbridge (as per TR-2) may be appropriate. Nevertheless, the alternative strategies promoted are a reasonable basis for further testing and one of the outcomes could be a new alternative strategy being identified.

Next Steps

42. Subject to approval of the proposals in this report, the next steps will be:
- (i) Assessment of Alternative Development Strategies: The Alternative Development Strategies will be subject to further testing through sustainability appraisal, transport assessments and discussions with service and infrastructure providers.
 - (ii) Informal consultation: Informal consultation, similar to that which took place between October and November 2018 with town and parish councils and representatives of neighbourhood plan groups, will be repeated to discuss in more detail site options.

- (iii) Developer Forum: Delivery of the allocations in any plan is essential. Meeting with site promoters and agents is an important part of understanding how and when sites could be brought forward. A developer forum is proposed to discuss site availability, delivery and viability issues. This will also provide the opportunity for the development industry to comment on the Alternative Development Strategies.
- 43. All the above actions relate to the review and roll forward of the development strategy within the local plan. A parallel piece of work is ongoing in relation to a review of the core policies and saved policies which form part of the development plan. The consultation undertaken in 2017 sought views on existing saved policies and core policies and their continued compliance with national policy¹⁰.
- 44. The informal consultation that took place with local members, parish councils and representatives of neighbourhood plan groups in 2018 included two rural workshops where current policy for the rural areas was discussed in the light of the NPPF 2018. The outcome of these workshops and the responses received during the November 2017 consultation continue to inform the review of policies.

Overview and Scrutiny Engagement

- 45. There has been no overview and scrutiny engagement at this stage.
- 46. The approach to creating alternative development strategies for assessment as part of the local plan review process has been discussed with members of the Swindon and Wiltshire Joint Working Group, a forum for informal discussion established to facilitate joint working.

Safeguarding Implications

- 47. There are no safeguarding implications arising from the proposal

Public Health Implications

- 48. Planning for sustainable development can meet the employment, housing and infrastructure needs of communities. This helps to support the health and wellbeing of the Wiltshire population.
- 49. The environment in which we live can have both positive and negative impacts on our lifestyles. The provision of appropriate infrastructure and effective urban design can support council strategies that aspire to improve public health, such as the Wiltshire Obesity strategy. Effective infrastructure for existing and new developments can support healthy choices by encourage walking and cycling as means of active travel.

¹⁰ Wiltshire Local Plan Review Consultation Paper November 2017 available at <http://www.wiltshire.gov.uk/spp-wlpr-2017-11-consultation-paper.pdf>

50. Maintaining up-to-date policy for Wiltshire supports the timely delivery of social infrastructure to improve the resilience of our communities. There are on going discussions to improve how development management policies in the local plan can continue to support the health and well-being of Wiltshire's communities.

Procurement Implications

51. The proposals have no direct procurement implications in themselves. However, to gather appropriate evidence for the Wiltshire Local Plan Review and support plan making further procurement will be necessary. For example, commissioning a Strategic Flood Risk Assessment to inform strategy development, site selection and policy development. New evidence requirements will be undertaken in accordance with procurement and contracting Regulations and in consultation with Strategic Procurement.

Equalities Impact of the Proposal

52. The purpose of maintaining up to date planning policies in Wiltshire is to ensure growth and development in the County is positively managed. The consultation processes and community involvement embedded in plan preparation in accordance with the Wiltshire Statement of Community Involvement ensures that everyone has an opportunity to inform the review of the local plan.
53. When the plan is submitted to the Secretary of State for examination it will be accompanied by an Equality Impact Assessment undertaken as part of the review of the local plan to ensure the Council discharges its duties under the Equality Act 2010

Environmental and Climate Change Considerations

54. The Wiltshire Local Plan relates to the development and use of land and will have implications for the physical, economic and social environment of Wiltshire. Sustainability Appraisal, incorporating Strategic Environmental Assessment and Habitats Regulations Assessment, will be undertaken as part of the local plan review to ensure that negative environmental impacts are avoided or mitigated, and policies and proposals deliver development in a sustainable manner.
55. The process of plan making incorporating Sustainability Appraisal will take into consideration both the current position and predicted future considerations in relation to the local environment, for example, in relation to climate change and flood risk and in relation to future traffic growth.
56. The draft Wiltshire Sustainability Appraisal (SA) Scoping Report was consulted on as part of the Regulation 18 consultation last year. The SA Scoping Report has been amended in the light of comments received and is available on the council's web site (<http://www.wiltshire.gov.uk/planning-policy-local-plan-review>). This has been used to make an initial

assessment of the proposed alternative development strategies discussed above.

57. Through the preparation of local plan policies including those that guide development management decisions consideration will be given to climate change issues. The review will take into consideration the outcome of work being undertaken by a task group of the Overview and Scrutiny Management Committee of 19 March 2019 which was requested to be formed by the Environment Select Committee of 23 April 2019.

Risks that may arise if the proposed decision and related work is not taken

58. It is important that Wiltshire continues to maintain up-to-date policy to ensure that plan-led growth, that best meets the needs of Wiltshire, can be delivered. Failing to do so would increase the risk that growth would occur piecemeal, be speculative by developers rather than as planned. The NPPF 2019 set out the clear expectation that plans should be reviewed every 5 years.
59. The NPPF sets out the 'presumption in favour of sustainable development' and states that where plans are out of date, silent or indeterminate, then permission should be granted. In addition, it requires a five-year land supply to be maintained and sufficient housing land to be identified. Moving forward now on the basis outlined above should maintain progress on the review of the local plan and ensure the supply of housing is maintained beyond 2026, reducing the risk of non-plan led development in the longer term.

Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

60. There remains a risk that the Government issue new advice on how the standard methodology will be calculated before the plan is submitted to the Secretary of State for Examination. Ultimately, the process will need to retain some flexibility to respond to any changes in the national policy approach. This is also a risk for Swindon Borough Council. The recent review of the SHMA as reported above to assess local housing need in Wiltshire was part of managing these risks.
61. The Wiltshire Housing Site Allocations Plan (WHSAP) is currently at Examination. The plan and its evidence are being examined in accordance with the NPPF 2012 in accordance with the transitional arrangements outlined in the updated NPPF. This is following a separate process however some confusion may arise in relation to the role and purpose of WHSAP compared to that of the Local Plan Review.
62. Other risks include:
 - (i) Unrealistic expectations arising from introducing a discussion of new communities. Such large-scale proposals take time to bring to fruition and

do not necessarily remove the need to deliver shorter term developments to maintain the five-year housing land supply and meet the Government's housing delivery test.

- (ii) The involvement of local communities earlier in the process to inform the discussion about scales of growth and sites at places is most definitely a benefit. However, this could raise the expectation that the plan will be community led. In seeking to be in accordance with national policy and deliver the plan's strategic objectives for the county difficult decisions may need to be made which do not reflect the communities' aspirations. This is the role of the local planning authority.

- 63. There is also a risk of misinformation in this period of plan development. These risks will be managed through clear and timely communications both within and outside the organisation to explain the process of plan making. This will include specific events with local members, town and parish councils and representatives of neighbourhood plan steering groups to continue the discussion about sites and the appropriate levels of development at specific towns begun last Autumn.
- 64. Discussions will also take place with neighbouring authorities, service and infrastructure providers and the development industry to manage future risks and uncertainties; ensuring they are appropriately engaged in the Local Plan Review.

Financial Implications

- 65. The 2019/2020 budgets for the Economic Development and Planning Service will meet financial implications of continuing with the review of the local plan. New evidence will be required to support the evolving plan in the financial year 2020/21, as well as expenses relating to consultation and examination costs.
- 66. Acquiring additional evidence will involve commissioning work from external sources due to the technical expertise required or internal resourcing, for example, traffic modelling and assessment. Economies of scales suggest some additional evidence could be jointly commissioned with Swindon Borough Council, but this will be decided on a project by project basis. Other evidence may be prepared using 'in-house' resources of the Councils, for example, the Strategic Housing and Employment Land Availability Assessment.
- 67. Adoption of the Wiltshire Local Plan will help bring forward new sites for housing, thereby enabling the Council to benefit from revenue and capital associated with the delivery of new homes including contributing to the Council's Council Tax base.

Legal Implications

- 68. In accordance with the Planning and Compulsory Purchase Act 2004 (as amended), the Council has a statutory duty to prepare planning policy, which has been reinforced through the NPPF and the Localism Act 2011.

69. The Council has a statutory duty to engage with local communities and other stakeholders during plan preparation in accordance with its Statement of Community Involvement. The consultation in 2017 was part of ongoing discussions on the scope of the local plan under Regulation 18 Town and Country Planning (Local Planning) (England) Regulations 2012. The informal engagement recently undertaken with local members, town and parish councils and representatives of neighbourhood plan steering groups in 2018 referred to in this report and the proposed further consultation with the same stakeholders continues to be part of the Regulation 18 Town engagement.
70. Furthermore, Section 110 of the Localism Act 2011 introduces a 'Duty to Cooperate' in relation to planning for sustainable development (as a new section 33A into the Planning and Compulsory Purchase Act 2004). This requires Wiltshire Council to engage constructively, actively and on an on-going basis to maximise planning on strategic cross boundary issues. Such engagement will be embedded in the plan making process and will inform policy development.
71. Once adopted, the Wiltshire Local Plan and Wiltshire Housing Site Allocations Plan will form part of the statutory development plan for the area and be used as such for determining relevant planning applications across Wiltshire.

Options Considered

72. The options open to the Council are limited as Wiltshire Council is required to maintain up-to-date planning policies within the county which are compliant with national planning policy. To review the plan against out of date policy would result in a document that would fail the tests of soundness outlined at paragraph 35 of the NPPF 2019.
73. The process for identifying alternative development strategies to deliver new development in Wiltshire includes consideration of options for growth. It is embedded in the local plan process and will help to identify the most appropriate strategy for Wiltshire. Further stages in plan preparation will assess different site options at individual places as part of the Sustainability Appraisal (referred to above).

Conclusion

74. In line with national policy it is important to adopt a flexible approach to calculating the plan's housing requirement based on a local assessment of housing need using the standard methodology as a starting point. It is considered that a range of housing needs should be considered in the first instance and as a basis to test and inform a final local plan housing requirement.
75. The proposed reasonable alternative development strategies for the distribution of growth in Wiltshire forms the basis for this testing. Judgements have been made to create these, which have been informed

by evidence and consultation. To not consider reasonable alternative approaches to growth within Wiltshire and rely on the same distribution strategy as included within the Wiltshire Core Strategy would ignore any changes of circumstances that have taken place at individual settlements and compromise the Council's ability to deliver sustainable growth.

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Appendices

Appendix 1: Map of Housing Market Areas

Appendix 2: Swindon and Wiltshire Local Housing Needs Assessment, April 2019

Appendix 3: Standard Methodology: Key Variables

Appendix 4: Chippenham Housing Market Area: Assessment Summary

Appendix 5: Salisbury Housing Market Area: Assessment Summary

Appendix 6: Swindon Housing Market Area Assessment (Wiltshire part):
Assessment Summary

Appendix 7: Trowbridge Housing Market Area Assessment: Assessment
Summary

Appendix 8: Alternative Development Strategies – Range of additional dwellings
to be tested

Background Papers None