

# AGENDA (Item 12 only)

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Meeting: **Cabinet**  
Place: **The Kennet Room - County Hall, Trowbridge BA14 8JN**  
Date: **Tuesday 20 June 2017**  
Time: **9.30 am**

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## Membership:

Cllr Baroness Scott of Bybrook OBE	Leader of Council
Cllr John Thomson	Deputy Leader, and Cabinet Member for Communications, Communities, Leisure and Libraries
Cllr Chuck Berry	Cabinet Member for Economic Development and Housing
Cllr Richard Clewer	Cabinet Member for Corporate Services, Heritage, Arts and Tourism
Cllr Laura Mayes	Cabinet Member for Children, Education and Skills
Cllr Toby Sturgis	Cabinet Member for Planning and Strategic Asset Management
Cllr Bridget Wayman	Cabinet Member for Highways, Transport and Waste
Cllr Philip Whitehead	Cabinet Member for Finance, Procurement, IT and Operational Assets
Cllr Jerry Wickham	Cabinet Member for Adult Social Care, Public Health and Public Protection

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For assistance on these and other matters please contact the officer named above for details



12 **Wiltshire Housing Site Allocations Plan** (*Pages 5 - 368*)

To consider the draft Wiltshire Housing Site Allocation Plan and approach to consultation.

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**Wiltshire Council**

**Cabinet**

**20 June 2017**

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**Subject: Draft Wiltshire Site Allocations Plan**

**Cabinet Member: Councillor Toby Sturgis - Planning and Strategic Asset Management**

**Key Decision: Yes**

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## **Executive Summary**

The Wiltshire Core Strategy (adopted January 2015) plans for housing to come forward through a number of sources including: its strategic site allocations, neighbourhood planning, planning applications and subsequent site allocations plans. The Council's Local Development Scheme identified the need to prepare two site allocations plans which, as recognised in the Wiltshire Core Strategy, would allocate further sites for new homes and also review settlement boundaries. The Chippenham Site Allocations Plan was adopted by Council on 16 May 2017 and plans for additional new homes at Chippenham. A Draft Wiltshire Site Allocations Plan has now been prepared for the rest of Wiltshire to:

- (i) Identify, where necessary, new allocations for housing at settlements to provide for additional housing to ensure the delivery of the Wiltshire Core Strategy housing requirement of at least 42,000 dwellings (2006 to 2026) and maintain a five year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026; and
- (ii) Review, where necessary, settlement boundaries (or 'limits of development') in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns, Local Service Centres and Large Villages.

The Draft Plan will complement the Chippenham Site Allocations Plan and neighbourhood planning. The overall level of growth proposed for allocation in the Draft Plan is 2,465 homes; with 1,205 homes in the North and West HMA (14 sites), 350 homes in the East HMA (4 sites) and 910 homes in the South HMA (6 sites).

Settlement boundaries have been reviewed to ensure that they properly reflect development that has occurred since they were first established and a consistent approach is taken across Wiltshire. This is with the exception of those boundaries that have recently been reviewed through sufficiently advanced Neighbourhood Plans and do not require further updates to take into consideration implemented

development.

At this stage of the process, the Council is publishing what it considers to be a sound plan and should be able to proceed to the submission stage following the consultation. At the submission stage the Draft Plan is formally submitted to the Secretary of State, who will appoint an Inspector to examine the Draft Plan in terms of its soundness. In examining the document the Inspector will consider the robustness of the evidence base and representations received at this formal stage of consultation.

Publication of the Draft Plan for consultation is proposed to start during the week commencing 10 July for ten weeks. Additional time to the statutory period of at least 6 weeks is proposed to allow for the consultation running over the summer period. Consideration of the Draft Plan by Cabinet has been delayed due to the announcement of the General Election and purdah, which will have a knock on effect to the overall timetable for the Plan.

## **Proposals**

That Cabinet:

- (i) Approves the Draft Wiltshire Housing Site Allocations Plan, as set out in **Appendix 1** subject to amendment in (ii);
- (ii) Authorises the Associate Director for Economic Development and Planning in consultation with the Cabinet Member for Planning and Strategic Asset Management to: make any necessary minor changes to the Draft Wiltshire Housing Site Allocations Plan in the interests of clarity and accuracy before it is published; make arrangements for, and undertake statutory consultation for a 10 week period starting during the week commencing 10 July 2017.

## **Reason for Proposals**

To ensure that progress continues to be made on maintaining an up-to-date development plan for Wiltshire, in line with the Council's Local Development Scheme and statutory requirements. In accordance with legislative requirements, following the consultation, Council will need to approve the submission of the Draft Wiltshire Housing Site Allocations Plan to the Secretary of State for examination.

**Dr. Carlton Brand**  
**Corporate Director**

## **Wiltshire Council**

### **Cabinet**

**20 June 2017**

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**Subject: Draft Wiltshire Housing Site Allocations Plan**

**Cabinet Member: Councillor Toby Sturgis, - Planning and Strategic Asset Management**

**Key Decision: Yes**

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### **Purpose of Report**

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1. To:
  - (i) Seek Cabinet's approval for the Draft Wiltshire Housing Site Allocations Plan.
  - (ii) Seek delegated authority to make arrangements for its consultation and the next steps.

### **Relevance to the Council's Business Plan**

2. Progression of the plan is important to realising the overarching aims of the Business Plan 2013-2017 of delivering stronger and more resilient communities through the identification of land to deliver new homes, to complement the Wiltshire Core Strategy.

### **Background**

3. The Wiltshire Core Strategy, adopted January 2015, plans for housing to come forward through a number of sources including: its strategic site allocations, neighbourhood planning and planning applications; as well as subsequent site allocations development plan documents. It also recognised that settlement boundaries (or 'limits of development') would need to be reviewed to ensure they are up to date. The need to bring forward new homes through site allocation development plan documents was identified to provide a surety of housing supply throughout the Plan period to 2026. Council on 16 May 2017 adopted the Chippenham Site Allocations Plan, which reviews the settlement boundary for Chippenham and allocates land for 2,050 homes at the town. The Wiltshire Housing Site Allocations Plan complements the Chippenham Plan in reviewing settlement boundaries and providing for additional homes where needed elsewhere in the County.

4. The Council's Local Development Scheme (LDS) approved by Cabinet early 2014 first introduced the commitment to prepare the Wiltshire Housing Site Allocations Plan (hereafter referred to as the 'Draft Plan'). The LDS was updated in December 2016 and sets out the current timeline for preparation of the Plan. Consultation was programmed to commence June 2017, with submission to the Secretary of State programmed for February 2018. However, consideration of the Draft Plan by Cabinet has been delayed due to the announcement of the General Election and purdah, which will have a knock on effect to the overall timetable for the Plan.
5. The Draft Plan has been prepared in general conformity with the Wiltshire Core Strategy and will:
  - (i) Identify, where necessary, new allocations for housing at settlements to provide for additional housing to ensure the delivery of the Wiltshire Core Strategy housing requirement of at least 42,000 dwellings (2006 to 2026) and maintain a five year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026; and
  - (ii) Revise, where necessary, settlement boundaries (or 'limits of development') in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns (12 in total), Local Service Centres (7 in total) and Large Villages (66 in total).

Small villages, in accordance with the Core Strategy, do not have settlement boundaries and only have the potential for limited infill development. As such, they are not considered through the Draft Plan.

6. The Settlement Strategy (Core Policy 1) and the Delivery Strategy (Core Policy 2) together with the Area Strategy Policies (Section 5) guide where and how much development should take place to provide for a sustainable pattern of growth. Core Policy 2 sets out housing requirements by Housing Market Area (HMA) and indicative requirements are provided in the Area Strategy Policies for each Community Area, the Principal Settlements and Market Towns and, in the South Wiltshire HMA the Local Service Centres. These are not intended to be prescriptive minima or maxima and instead they are an indication of the general scale of growth appropriate for each area and settlement during the plan period; and are expressed as 'approximate' or 'about' figures. In accordance with Core Policy 2, sites for housing development may come forward through new allocations on the edge of settlement boundaries where they are identified in neighbourhood or site allocations plans.

### **Main Considerations for the Council**

7. The starting point for the Draft Plan is the requirements set out in the Wiltshire Core Strategy. As a subsidiary document to the Core Strategy, with

a particular purpose, the Draft Plan does not provide an opportunity to revisit the strategic policies within the core strategy, for example, the status of settlements or housing requirements.

9. Work on the Draft Plan commenced early March 2014, when in accordance with statutory requirements the formal Regulation 18 consultation on the scope of the Plan was carried out. At the same time, there was a call for sites to enable interested parties to put forward land for consideration through the Plan. Informal targeted consultation was undertaken on: draft proposals for amending settlement boundaries (July to September 2014); draft site selection methodology and initial site options (February to March 2015); and further consultation on the approach to large villages (June to August 2015). Full details of the consultation, together with the representations received and the Council's response is set out in the report on the Council's website at [this link](#).

#### Settlement Boundary Review

10. The purpose of settlement boundaries and methodology for their review is set out in **Appendix 2** (Topic Paper 1: Settlement Boundary Review Methodology). The Wiltshire Core Strategy uses settlement boundaries as a policy tool for managing how development should take place. Boundaries generally relate to the built up area of settlements and need to be reviewed to ensure that they properly reflect development that has occurred since they were first established - these may relate to more than one or parish. There is a general presumption in favour of development within settlement boundaries, with development outside only supported in appropriate circumstances determined by policies within the Core Strategy (Core Policy 2). This includes the allocation of land through site allocation plans and neighbourhood plans.
11. All boundaries have been reviewed in order to ensure a consistent approach, with the exception of those boundaries that have recently been reviewed through sufficiently advanced Neighbourhood Plans and do not require further updates to take into consideration implemented development.

#### Proposed Site Allocations

12. During the course of the Draft Plan's preparation, new sites for housing outside of settlement boundaries have been granted planning permission and to a lesser extent identified through neighbourhood plans. This has reduced the residual requirement at each of the Housing Market Areas (HMAs). Table 1 below sets out the housing requirements for Wiltshire's HMAs as set out in Core Policy 2 together with progress towards meeting those requirements. This has a base date of 1 April 2017 and has been forecast using the Council's recently published Housing Land Supply Statement (March 2017). While on the face of it, with the exception of the North and West HMA, there appears to be only a small proportion of the requirement left to be planned

for this does not take into consideration the need to maintain a five year land supply (with buffer) across the Plan period - a requirement of the National Planning Policy Framework (NPPF). Table 2 illustrates the current five year land supply position year on year without any new allocations.

13. The residual remaining requirement is 1,335 across the HMAs, which compares with 2,465 homes proposed to be allocated in the Plan (see paragraph 19 below - Table 3 illustrates the effect of the allocations on the five year land supply).

Area	Requirement (at least) 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	Remaining requirement
East Wiltshire HMA	5,940	3,497	2,273	170
North and West Wiltshire HMA <sup>1</sup>	24,740	12,603	11,566	571
South Wiltshire HMA	10,420	5,067	4,759	594

**Table 1: Housing Land supply for Wiltshire’s HMAs (forecast at 1 April 2017)**

HMA	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
East	8.47	8.18	8.32	10.11	13.64	10.79	8.21	6.29	4.94
North & West	6.62	6.80	6.81	6.55	6.48	6.11	5.42	4.60	3.82
South	5.64	5.57	5.42	5.35	5.28	5.13	4.59	3.83	2.97

**Table 2: Five year housing land supply position by HMA (2017-2026)**

14. The methodology for site selection involves a six stage approach and is set out in **Appendix 3** (Topic Paper 2 - Site Selection Process Methodology). This has been developed following feedback from the targeted consultation with parish and town councils and the development industry. Stage 1 of the process identifies 'areas of search' where the Plan should look to allocate sites for housing development. These are generally those 'areas' (see paragraph 6) where currently dwelling completions and commitments fall short of the indicative requirements set out in the Core Strategy and where there is the need to bring forward sites through the Plan in order to support the role and function of settlements.
15. In order to be sure of maintaining a five year land supply, the Plan aims to



provide for at least six years supply in each remaining year of the Plan period (i.e. five years plus highest buffer of 20% set out in the NPPF).

### Draft Plan

16. The Draft Wiltshire Housing Sites Allocations Plan is set out in **Appendix 1** and is structured as follows:
  - (i) **Introduction** (Section 1) and **Context** (Section 2): Introductory sections to the Plan, which sets out background, policy context, supporting evidence and how to comment.
  - (ii) **Plan Objectives** (Section 3) and **Housing Delivery Strategy** (Section 4): Clarifies the objectives of the Plan including the settlement boundary review and the approach, how many homes are needed and where, the methodology for site selection and introduces the proposed allocations.
  - (iii) **Site Allocations** (Section 5): Sets out the policies, explanatory text and proposed changes to the policies maps relating to the proposed allocations.
  - (iv) **Settlement Boundary Review** (Section 6 and Appendix 1): Summarises the methodology for the boundary review and proposed changes to the policies maps.
  - (v) **Monitoring and Implementation** (Section 7): Clarifies how delivery of the Plan will be monitored.
17. A number of evidence papers that have informed the Draft Plan will be published alongside it. These have been made available as part of the Agenda papers, as follows:
  - (i) Topic Paper 1: Settlement Boundary Review Methodology (Appendix 2)
  - (ii) Topic Paper 2: Site Selection Methodology (Appendix 3)
  - (iii) Topic Paper 3: Housing Land Supply (Appendix 4)
  - (iv) Topic Paper 4: Developing Plan Proposals (Appendix 5)
  - (v) Topic Paper 5: Assessment of Viability (BNP Paribas) (Appendix 6)
18. The application of the methodology and findings are set out by Community Area in individual evidence papers informing the Plan (referred to as Community Area Topic Papers). These have been made available alongside the Agenda papers on the Council's website at [this link](#). Further justification for the proposed allocations is set out in **Appendix 5**.
19. The overall level of growth allocated in the Plan is 2,465 homes; with 1,205

homes in the North and West HMA (14 sites), 350 homes in the East HMA (4 sites) and 910 in the South HMA (6 sites). Table 3 below illustrates the effect of the allocations on the five year land supply).

HMA	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
East	9.18	9.11	9.75	12.20	22.44	20.18	14.01	9.81	7.45
North & West									
West	7.15	7.54	7.64	7.54	7.85	7.92	7.48	6.54	5.30
South	6.09	6.30	6.43	6.65	6.88	7.13	6.70	5.87	4.75

**Table 3: Five year housing land supply position by HMA (2017-2026) including proposed allocations**

20. Alongside the above evidence, the following documents will also be made available when the Draft Plan is published:
- (i) A **Habitats Regulations Assessment (HRA)** has been undertaken to consider whether the Draft Plan is likely to have a significant effect on the integrity of internationally important wildlife sites in line with European legislation. This has confirmed that with mitigation there are unlikely to be adverse effects. In preparing the Draft Plan consideration has been given to effects on European designations, and the Community Area Topic Papers illustrate where this has influenced the proposals within the Draft Plan.
  - (ii) Draft **Sustainability Appraisal (SA) Report**: to demonstrate that the Draft Plan is sustainable and suggests mitigation measures to avoid or reduce negative impacts through an appraisal of reasonable options. SA has been integral to the sites selection process and the Community Area Topic Papers refer to the SA indicating how it has helped shape the proposals in the Draft Plan.
  - (iii) **Consultation Statement**: to set out the consultation that has been undertaken and has informed the preparation of the Draft Plan. Targeted consultation has been undertaken appropriate to this Draft Plan in accordance with the Council's Statement of Community Involvement. This document (Statement of Early Community Engagement) accompanies the Agenda papers and is available via the following link: [this link](#).

#### Consultation Arrangements

21. Preparations will be made to publish the Draft Wiltshire Housing Site Allocations Plan and supporting documents for a period of ten weeks in accordance with the Council's Statement of Community Involvement and statutory requirements. The consultation will start as soon as possible during the week commencing 10 July 2017 and allow for a ten week consultation period. It will include:

- (i) Early notification to Parish and Town Councils following Cabinet approval.
- (ii) Letter or email to consultees on the Spatial Planning consultation database, providing notification of the consultation.
- (iii) Online publication on the Council's website including consultation portal.
- (iv) Publication of advertisement in local newspapers to cover Wiltshire and the Parish/Town Council Newsletter.
- (v) Publication of press release on 'Our Community Matters' websites.
- (vi) Notification of the consultation to be distributed through Community Area Board networks and via Chairman's announcements at Board meetings leading up to and during the consultation period as necessary.
- (vii) Documents being made available for viewing at the Council's main office hubs (Chippenham, Devizes, Salisbury and Trowbridge) and at libraries.
- (iii) Four public exhibitions in Chippenham (17 July), Salisbury (19 July), Devizes (24 July) and Trowbridge (26 July ) from 12 noon until 7pm, with Officers in attendance to answer questions.

#### Next Steps

22. Once the consultation has closed all responses will be considered in order to determine whether any changes to the Draft Plan are required. The outcome of the consultation following consideration of responses will be reported back to Cabinet before the Draft Plan and accompanying documents (as set out in the Legal Implications section) go to Council for approval. Following Council approval, the Plan will be submitted to the Secretary of State. The Local Development Scheme anticipated submission February 2018, although given the delays as outlined in paragraph 4 submission is likely to be around May 2018. Once submitted to the Secretary of State, the process of independent examination by a Government appointed Inspector will take place.

#### **Safeguarding Implications**

23. There are no safeguarding implications as a direct result of this proposal.

#### **Public Health Implications**

24. Planning for sustainable development to meet the employment, housing and infrastructure needs of communities helps foster their wellbeing. Well planned development, including appropriate infrastructure, supports health and well being of local communities, for example through the provision of green infrastructure and infrastructure to encourage walking and cycling as means of travel.

#### **Procurement Implications**

25. There are no further procurement implications as a direct result of this

proposal.

## **Environmental and Climate Change Considerations**

26. Spatial Planning has implications for the natural, economic and social environment. A Sustainability Appraisal incorporating Strategic Environmental Assessment has been undertaken during the preparation of the Draft Plan ensuring that negative environmental impacts are avoided and sustainable development can be delivered. A Habitat Regulations Assessment has also been undertaken (see paragraph 20 above).
27. Managing climate change is one of the cross cutting objectives of the Wiltshire Core Strategy and therefore a principle reflected in this Draft Plan. In particular, it seeks to deliver the most sustainable pattern of growth to help promote self-containment as far as possible and minimise the need to travel, particularly by the private car. Work on flood risk has been undertaken as part of the process to ensure that development is not vulnerable to flooding or increases the risk of flooding elsewhere.
28. The Wiltshire Housing Site Allocations Plan will become part of the development plan for Wiltshire, alongside the Wiltshire Core Strategy, once adopted. The specific policies within the Core Strategy to protect and enhance the environment and protect against climate change will be relevant in the consideration of the planning applications that result from the Plan.

## **Equalities Impact of the Proposal**

29. The Draft Plan aims to positively manage growth in accordance with the Wiltshire Core Strategy and seek to ensure sufficient homes are available to meet housing needs. The proposed consultation has been designed to help ensure that everyone has the opportunity to comment on the Draft Plan.
30. When the Draft Plan is submitted to the Secretary of State for examination, Regulations require that it will be accompanied by an Equalities Impact Assessment undertaken as part of a process to help the Council ensure that it discharges its section 149 duty under the Equality Act 2010 to have due regard to the need to:
  - eliminate discrimination;
  - advance equality of opportunity between persons who share a “relevant protected characteristic” and persons who do not share it;
  - foster good relations between persons who share a “relevant protected characteristic” and persons who do not share it.

## **Risk Assessment**

31. Implementation of the Wiltshire Core Strategy is dependent on the progression of the Wiltshire Housing Site Allocations Plan to ensure that sufficient land is available for housing development and settlement boundaries are up to date.
32. A plan led approach to development in Wiltshire will enable the most sustainable sites for development to be identified, minimising impact on the local environment and maximising benefits of development rather than a piecemeal speculative approach.

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

33. There is a considerable amount of developer interest in Wiltshire. This means that in the absence of a Plan, the Council would need to consider speculative applications on a case by case basis impacting on the Council's ability to plan effectively for growth in the most sustainable way. Speculative applications can lead to additional costs for the Council through appeals and divert capacity away from core business.
34. Progression of the Draft Plan will help ensure that the Council is able to maintain and demonstrate a five year supply of housing land, in accordance with the requirements of the Government's National Planning Policy Framework, through the identification of sites for development. Without a five year land supply the Council is less able to defend against speculative development proposals. Maintaining a five year supply of housing should also ensure that the scale of growth appropriate for Wiltshire is managed and directed at the most sustainable locations and allocated proportionately to the scale, role and function of specific settlements.

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

35. There is a reputational risk to the Council as criticism may be attracted from local people who do not want to see developments close to where they live or areas they value. As part of the consultation arrangements local people will have the opportunity to find out more about the proposals and put forward any comments through the consultation.
36. See legal implications below for further risks.

## **Financial Implications**

37. The financial implications of the preparation and consultation of the Draft Plan will be met from existing budget and income provision from the Economic Development and Planning budget during 2017/18. Provision will need to be made in the 2018/19 budget for costs associated with the submission and examination of the Draft Plan.
38. Progression of the Draft 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**

39. In accordance with the Planning and Compulsory Purchase Act 2004 (as amended), the Council has a statutory duty to prepare planning policy and maintain up to date policy, which is reinforced through the National Planning Policy Framework (NPPF). The Draft Plan has been prepared consistent with legislation. As illustrated by the Government's Housing White Paper, changes to legislation and the NPPF are being proposed as part of the Government's planning reforms. Currently, it is not clear what the implications (if any) will be for the Draft Plan.
40. The Council has a statutory duty to engage with local communities and other stakeholders bodies at this stage in the process in accordance with its Statement of Community Involvement.
41. Legislation relating to the local plan preparation process is set out in the Town & Country Planning (Local Planning) (England) (Amendment) Regulations 2012. Prior to submitting a plan to the Secretary of State, in accordance with these the Council must publish for inspection and invite representations on:
  - (i) The proposed submission plan and accompanying proposed changes to the policies map;
  - (ii) Sustainability appraisal report of the proposed plan;
  - (iii) Statement setting out which bodies and persons were invited to make representations on the subject of the plan, how they were invited, a summary of the main issues raised and how those main issues have been addressed (Regulation 18 stage); and
  - (iv) Other accompanying documents relevant to the preparation of the plan.
42. Following the close of the consultation, all representations will need to be considered and summarised. Copies of any representations made together with the summary will need to be submitted to the Secretary of State alongside the above documents for examination. In line with legislative requirements, following the formal consultation, submission will need to first be approved by Council.
43. When examining Plans, Inspectors consider whether the Plan's preparation has complied with the duty to co-operate inserted into the Planning and Compulsory Purchase Act 2004 by Section 110 of the Localism Act 2011, before considering whether the plan is sound and compliant with other legal

requirement. The Council has engaged constructively, actively and on an ongoing basis with the local authorities and prescribed bodies in the Act during the preparation of the Draft Plan as well as through the preparation of the Wiltshire Core Strategy. A statement on how the Council has fulfilled the duty to co-operate to date also needs to be made available as part of the consultation documents and updated following the consultation.

44. Once adopted, the Wiltshire Housing Site Allocations Plan will form part of the statutory development plan for the area and be used as such for the purpose of determining relevant planning applications across Wiltshire.

### **Options Considered**

45. In preparing the Plan and identifying the proposals, different site options have been considered. The site options considered in each community area and the evidence based justification for the choices made are set out in the evidence papers. These show how the site selection methodology included in **Appendix 3** has been applied to the individual areas of search where allocation is required to ensure the housing levels set in in Core Policy 2 of the Wiltshire Core Strategy can be met over the Plan period.

### **Conclusion**

46. Publication of the Draft Wiltshire Housing Site Allocations Plan for its formal stage of consultation will enable progress to be made on the preparation of the Plan in line with the commitment in the Council's LDS. Submission to the Secretary of State could be achieved around May 2018.
47. At this stage the Council will be publishing what it considers to be a sound document that is based on evidence and targeted consultation.
48. Following consultation, Cabinet should consider the outcome to determine whether changes should be made to the Draft Plan before Council consider approval of the document for submission to the Secretary of State.

**Alistair Cunningham**

**Associate Director, Economic Development and Planning**

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Date of Report: 5 June 2017

**The following unpublished documents have been relied on in the preparation of this Report:**

**Appendices:**

- Appendix 1: Draft Wiltshire Housing Site Allocations Plan  
(including Appendix 1 'Proposed changes to policies maps - Settlement Boundaries')
- Appendix 2: Topic Paper 1: Settlement Boundary Review Methodology
- Appendix 3: Topic Paper 2: Site Selection Process Methodology
- Appendix 4: Topic Paper 3: Housing Land Supply
- Appendix 5: Topic Paper 4: Developing Plan Proposals
- Appendix 6: Assessment of Viability (BNP Paribas)

**Documents published with the Agenda:**

1. Statement of Early Community Engagement
2. Amesbury Community Area Topic Paper
3. Bradford on Avon Community Area Topic Paper
4. Calne Community Area Topic Paper
5. Chippenham Community Area Topic Paper
6. Corsham Community Area Topic Paper
7. Devizes Community Area Topic Paper
8. Malmesbury Community Area Topic Paper
9. Marlborough Community Area Topic Paper
10. Melksham Community Area Topic Paper
11. Mere Community Area Topic Paper
12. Pewsey Community Area Topic Paper
13. Royal Wootton Bassett and Cricklade Community Area Topic Paper
14. Salisbury Community Area Topic Paper
15. Southern Wiltshire Community Area Topic Paper
16. Tidworth Community Area Topic Paper
17. Tisbury Community Area Topic Paper
18. Trowbridge Community Area Topic Paper
19. Warminster Community Area Topic Paper
20. Westbury Community Area Topic Paper
21. Wilton Community Area Topic Paper



Appendix 1:

Draft Wiltshire Housing Site Allocations  
Plan

June 2017



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# 1. Introduction

## The Purpose of the Plan

1.1 The purpose of the Wiltshire Housing Site Allocations Plan ('the Plan') is to:

- Revise, where necessary, settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns, Local Service Centres and Large Villages; and
- Allocate new sites for housing to ensure the delivery of homes across the plan period in order to maintain a five year land supply in each of Wiltshire's three HMAs over the period to 2026.

### Settlement Boundary Review

1.2 The Council did not review the extent of the boundaries to inform the Wiltshire Core Strategy (WCS) and relied upon the former district local plans. They would instead be reviewed as a part of preparing the Plan.

1.3 Consequently, the Council has undertaken a comprehensive review of the boundaries to ensure they are up-to-date and adequately reflect changes which have happened since they were first established. The Plan amends settlement boundaries where necessary. It is also the prerogative of local communities to review them through the preparation of neighbourhood plans.

### Housing Site Allocations

1.4 The WCS refers to the role of the Plan, in combination with the Chippenham Site Allocations Plan, to help ensure a sufficient choice and supply of suitable sites throughout the plan period in accordance with national policy and to compliment neighbourhood planning.

## Plan Area

1.5 The Plan area is identified in Figure 1. It essentially corresponds with that of the adopted Core Strategy and hence covers Wiltshire, excluding the area of the Chippenham Site Allocations Plan.



**Figure 1: The Plan Area**

## How the Plan has been prepared

- 1.6 Housing allocations have been made in general conformity with the settlement strategy outlined in Core Policy 1 as well as the relevant community area strategies contained within Chapter 5 of the WCS. Core Policy 2 supports the identification of sites through a subsequent Site Allocations Plan - now named the 'Wiltshire Housing Site Allocations Plan'.



- 1.7 The preparation of the Plan has also been informed by relevant plans and on-going evidence gathering to support decisions on the choice of sites and changes to settlement boundaries. The result of this work and how decisions have been reached is presented in a series of Community Area Topic Papers covering each part of the Plan area.
- 1.8 Additional information has been collated into five other topic papers and, together with Community Area Topic Papers these are all available on the Council's website. The additional papers are:
- Topic Paper 1 - Settlement Boundary Review Methodology
  - Topic Paper 2 - Site Selection Process Methodology
  - Topic Paper 3 - Housing Land Supply
  - Topic Paper 4 - Developing Plan Proposals
  - Topic Paper 5 - Assessment of Viability
- 1.9 A number of documents result from aspects of plan preparation required by legislation and they too play an important part. They can also be found on the website and comprise:
- Sustainability Appraisal
  - Habitat Regulations Assessment
  - Equality and Diversity Impact Assessment
  - A record of the steps taken under the Duty to Co-operate
  - Consultation Statement

### **Duty to Co-operate**

- 1.10 The Plan is prepared under a legal 'duty to cooperate' requirement through the Localism Act 2011 which requires local authorities to work with neighbouring authorities and other prescribed bodies when preparing a development plan document. It places a legal duty on local planning authorities in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic matters. When preparing plans local authorities should also have regard to the Local Enterprise Partnership and other bodies prescribed in law.
- 1.11 The Council engaged with neighbouring authorities and statutory consultees throughout the preparation of the WCS, which sets the framework for this Plan. They supported the spatial strategy and quantum of development through the WCS preparation process. The spatial strategy and quantum of development can be considered to involve strategic issues where the duty to cooperate has already been fulfilled through the Core Strategy process.

1.12 Examples of strategic issues on which there has been continued co-operation in the preparation of this plan are:

- Flood and surface water drainage considerations for individual sites and the impact of cumulative development discussed with the Environment Agency.
- Any potential considerations to mitigate impact on the Strategic Road Network (SRN) with the Highways Agency, particularly for potential site allocation in Salisbury.
- Site specific landscape considerations discussed with Natural England.
- Biodiversity considerations discussed with Natural England.
- Site specific heritage considerations discussed with Historic England
- Any impact on the New Forest National Park by way of potential increased recreational use discussed with the New Forest National Park Authority.
- Ensuring that future development helps address and manage phosphate levels in the River Avon, its tributaries and surrounding catchment area. The management of phosphates in the River Avon catchment water system is being discussed with the Environment Agency and Natural England on an ongoing basis. A Nutrient Management Plan has been published and is being monitored<sup>1</sup>.

1.13 How the outcomes from the Duty to Co-operate have informed the preparation of the Plan is set out in a separate report: **(INSERT LINK)**

### **Sustainability Appraisal**

1.14 The Council appointed consultant Atkins to oversee the sustainability appraisal of the Plan. Sustainability Appraisal (SA) is iterative and integrated into the plan-making process, influencing the selection of site options and policies through the assessment of likely significant effects. A draft Sustainability Report has been published alongside the Plan: **(INSERT LINK)**

1.15 Comments are invited on this version of the SA report during the consultation period in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (see below).

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<sup>1</sup> 'Nutrient Management Plan - Hampshire Avon' May 2015  
<https://www.gov.uk/government/publications/nutrient-management-plan-hampshire-avon>

## Policies Map

- 1.16 On adoption, the Wiltshire Policies Map will be amended to include the proposals set out in Chapters 5 (site allocations) and 6 (settlement boundaries) of this Plan. These proposals are set out in the Community Area Topic Papers which have been published as evidence to support this Plan.

## How to comment on the Plan

- 1.17 This consultation is an opportunity to submit your comments on the draft Wiltshire Housing Allocations Plan.
- 1.18 To support the consultation, the Council has prepared a simple guidance document setting out how to make comments in relation to the key question of 'soundness'. The document together with a representation form can be found at: **(INSERT LINK)**
- 1.19 The form asks whether you consider the Plan to be 'sound' on four key points. These key points are taken from the National Planning Policy Framework ("the Framework") and should be considered in responding to the consultation.
- 1.20 Paragraph 182 of the Framework states:

*"The Local Plan, [in this case, the 'pre-submission' draft Wiltshire Housing Site Allocations Plan] will be examined by an independent Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Co-operate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound" - namely that it is:*

- **Positively prepared** - the plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** - the plan should be an appropriate strategy, when compared against the reasonable alternatives, based on proportionate evidence;
- **Effective** - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework."

1.21 Comments are invited on the draft Wiltshire Housing Site Allocations Plan, the draft Sustainability Appraisal and supporting evidence, during the consultation period which starts **TO BE INSERTED**.

1.22 Comments can be submitted:

**Online** via the Council's dedicated consultation portal: **(INSERT LINK)**

Wherever possible we actively encourage all submissions to be presented through the portal as this speeds up processing time and makes for a more efficient consultation.

**By email** using the representation form available at:

**www.wiltshire.gov.uk/TO BE INSERTED** and returned to

[spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk), or

**By post** in writing (please use the representation form) and sent to: Spatial Planning, Economic Development & Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

1.23 Following the consultation, the Council will register and consider the comments received before submitting the Plan (and all prescribed supporting documents) for independent examination. All comments received during the consultation period will be passed on to the appointed Inspector.

1.24 Any representations may be accompanied by a request to be notified at a specified address of any of the following:

- The Wiltshire Housing Site Allocations Plan has been submitted to the Secretary of State for independent examination;
- That the Inspector's Report (including any recommendations) into the examination of the Wiltshire Housing Site Allocations Plan has been published; and
- That the Wiltshire Housing Site Allocations Plan has been adopted.

1.25 It is therefore important that representors make their interests in the Plan clear on the representation forms. Failure to do so might affect the rights of individuals to be heard at any subsequent hearing sessions.

## 2. Context

### National

- 2.1 The National Planning Policy Framework (NPPF) sets out the government's planning policies for England. The NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions. One of its core principles is that development should be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. The Plan is being prepared in accordance with that principle.
- 2.2 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a 'golden thread' running through plan-making and decision-taking.
- 2.3 It is an objective of the NPPF to deliver a wide choice of high quality homes and to boost significantly the supply of housing. The Plan identifies additional sites with these objectives in mind. They are developable over the plan period and they will supplement the existing supply. Some settlements have more environmental constraints than others and both new and existing allocations for housing development have differing degrees of complexity. This means that the Plan must involve a degree of flexibility and pragmatism to ensure a steady overall supply of enough land for housing development.

### The Wiltshire Core Strategy

- 2.4 The Wiltshire Core Strategy (WCS) covers the whole of Wiltshire and sets out the council's spatial vision, key objectives and overall principles for development in the County over the plan period 2006 to 2026. The WCS has been produced to be consistent with national policy and the Wiltshire Community Plan.
- 2.5 The WCS identifies six key challenges for Wiltshire<sup>2</sup>:
- Economic growth to reduce levels of out commuting from many of Wiltshire's settlements
  - Climate change opportunities to reduce greenhouse gas emissions and mitigate the consequences of a changing climate
  - Providing new homes to complement economic growth and a growing population

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<sup>2</sup> Paragraphs 2.6-2.19 of the WCS

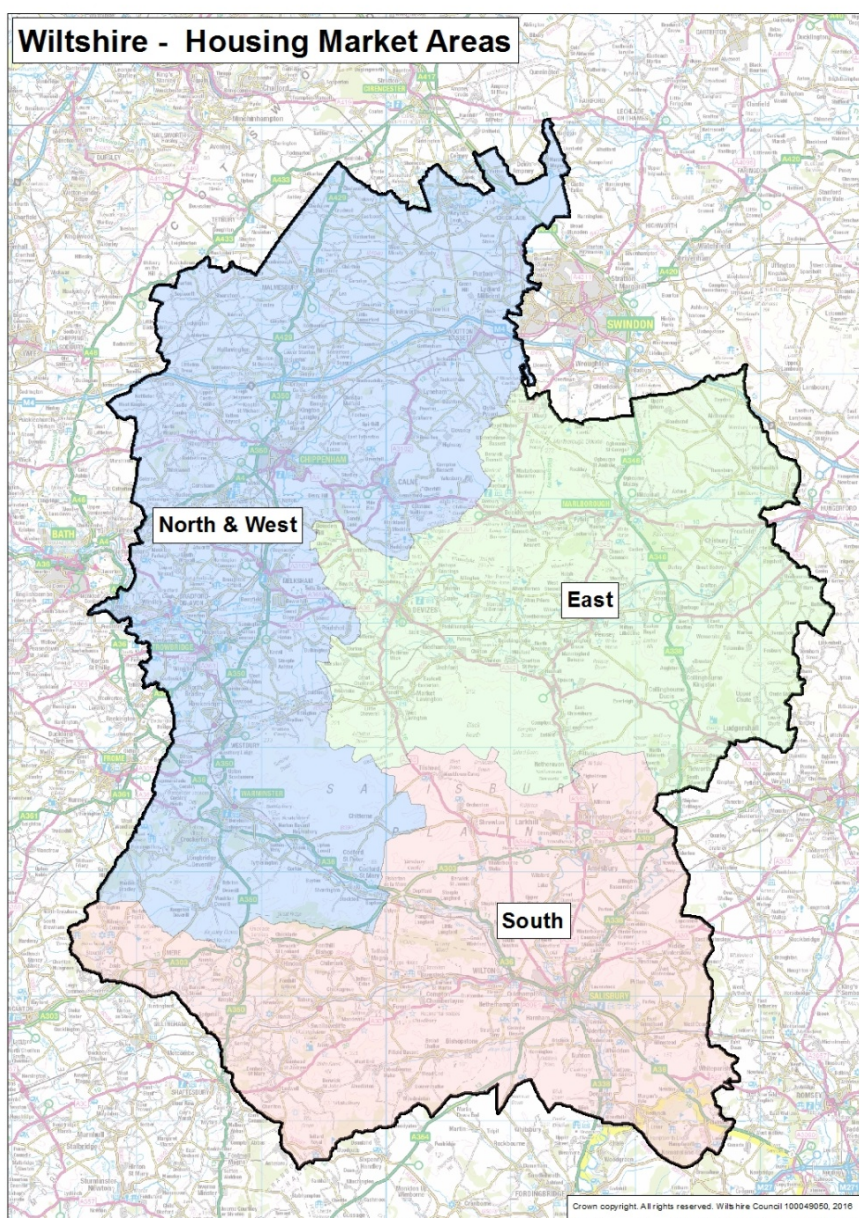
- Planning for more resilient communities
  - Safeguarding the environmental quality of the County whilst accommodating new growth, and
  - Infrastructure investment to meet the needs of the growing population and economy.
- 2.6 The WCS presents a settlement strategy for managing growth over the period up to 2026 (Core Policy 1). The strategy establishes tiers of settlements based on an understanding of their role and function; and how they relate to their immediate communities and wider hinterland.
- 2.7 Core Policy 1 of the Core Strategy identifies five types of settlements, namely:
- Principal settlements
  - Market towns
  - Local service centres
  - Large villages
  - Small villages
- 2.8 Settlement boundaries have been used in development plans for the County for a number of years. The WCS retains them. Except small villages each category of settlement has a “settlement boundary”. In simple terms, they are the dividing line, or boundary between areas of built/ urban development (the settlement) and non-urban or rural development - the countryside. In general, development within the settlement boundary is, in principle, acceptable, whereas development outside the settlement boundary is, with limited exceptions, not acceptable. The WCS uses settlement boundaries as a policy tool for managing how development should take place. Settlement boundaries are identified on the Policies Maps accompanying the WCS<sup>3</sup>.
- 2.9 Other than in circumstances as permitted by other policies listed in paragraph 4.25 of the WCS, development will not be permitted outside the defined settlement boundaries.
- 2.10 The WCS, in paragraph 4.13, sets out the intention for the retained settlement boundaries to be reviewed through the Housing Site Allocations Plan and the Chippenham Site Allocations Plan. Settlement boundaries can also be reviewed by the community through neighbourhood plans. The previous boundaries did not always reflect the built extent of settlements because they were determined some years ago. As a legacy of work done by the former District Councils, different methodologies were used to define the boundaries.

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<sup>3</sup> Amendments to settlement boundaries made by individual Neighbourhood Plans will also be shown on the relevant inset of the Development Plan Policies Maps



- 2.11 An objective of the Plan is therefore to review and update existing settlement boundaries to ensure they are up-to-date and accurately reflect circumstances on the ground, derived on a consistent county-wide basis. In some circumstances, a review of boundaries has been carried out by Neighbourhood Plans and will be in general conformity with the WCS.
- 2.12 Core Policy 2 of the WCS proposes that the County should accommodate at least 42,000 additional dwellings over the 2006 to 2026. The WCS disaggregates this scale of housing to three separate housing market areas (HMAs) shown below (East, North and West and South)<sup>4</sup>.



**Figure 2: Wiltshire Housing Market Areas**

<sup>4</sup> A separate allowance of 900 dwellings is also made for West of Swindon. See paragraph 4.34 of the WCS.

- 2.13 Core Policy 2 of the WCS proposes a minimum housing requirement for each HMA as follows:

Housing Market Area (HMA)	Minimum housing requirement (dwellings)
East Wiltshire	5,940
North and West Wiltshire	24,740
South Wiltshire	10,420

**Figure 2: Housing Market Area - Minimum requirements**

- 2.14 The NPPF requires that each Local Planning Authority demonstrate that there is five years supply of deliverable land for housing development for each of the HMAs based on the implied delivery rates of the WCS requirement. Fluctuations can occur in the delivery of housing but a central objective of the Plan, ensuring surety of supply, is to sustain a ‘five year housing land supply’ over the remainder of the plan period for each of these HMAs.
- 2.15 To guide how each HMA requirement should be achieved, the table below sets out the relationship between each tier of the settlement strategy and the expected level of development under Core Policy 1.

Settlement	Level of development
Principal settlement	The primary focus for development and will provide significant levels of jobs and homes
Market town	Have the potential for significant development that will increase the number of jobs and homes to help sustain/ enhance services and facilities and promote self-containment and sustainable communities
Local service centre	Modest levels of development to safeguard their role and deliver affordable housing
Large village	Development limited to that needed to help meet the housing needs of settlements and improve housing opportunities, services and facilities
Small village	Some modest development may be appropriate to respond to local needs and contribute to the vitality of rural communities, but limited to infill.

**Figure 3: Settlement Hierarchy - levels of development**

- 2.16 The WCS also disaggregates indicative levels of housing to each Community Area and includes indicative requirements for levels of housing for the Principal Settlements, Market Towns and in the South Wiltshire HMA, the



Local Service Centres and their surrounding community areas. This distribution of development directs the majority of development to these main settlements and promotes a sustainable pattern of development across the county. An objective of this Plan is to allocate land to support this distribution. The Plan allocations therefore focus on those 'areas' where land supply falls short of these indicative levels.

- 2.17 The indicative housing requirements as set out in the Table 1 and the Area Strategy Policies of the WCS are as follows:

Area	Indicative requirement 2006-2026
Devizes	2,010
Devizes CA remainder	490
Devizes CA Total	2,500
Marlborough	680
Marlborough CA remainder	240
Marlborough CA Total	920
Pewsey CA Total	600
Tidworth and Ludgershall	1,750
Tidworth CA remainder	170
Tidworth CA Total	1,920
<b>EAST WILTSHIRE HMA</b>	<b>5,940</b>
Bradford on Avon	595
Bradford on Avon CA remainder	185
Bradford on Avon CA Total	780
Calne	1,440
Calne CA remainder	165
Calne CA Total	1,605
Chippenham	4,510
Chippenham CA remainder	580
Chippenham CA Total	5,090
Corsham	1,220
Corsham CA remainder	175
Corsham CA Total	1,395
Malmesbury	885
Malmesbury CA remainder	510
Malmesbury CA Total	1,395
Melksham and Bowerhill	2,240
Melksham CA remainder	130
Melksham CA Total	2,370
Royal Wootton Bassett	1,070

Area	Indicative requirement 2006-2026
Royal Wootton Bassett and Cricklade CA remainder <sup>5</sup>	385
Royal Wootton Bassett and Cricklade CA <sup>5</sup> Total	1,455
Trowbridge	6,810
Trowbridge CA remainder	165
Trowbridge CA Total	6,975
Warminster	1,920
Warminster CA remainder	140
Warminster CA Total	2,060
Westbury	1,500
Westbury CA remainder	115
Westbury CA Total	1,615
<b>NORTH &amp; WEST WILTSHIRE HMA</b>	<b>24,740</b>
Amesbury, Bulford and Durrington	2,440
Amesbury CA remainder	345
Amesbury CA Total	2,785
Mere	235
Mere CA remainder	50
Mere CA Total	285
Salisbury	6,060
Wilton	
Wilton CA remainder	255
Salisbury and Wilton CAs Total	6,315
Downton	190
Southern Wiltshire CA remainder	425
Southern Wiltshire CA Total	615
Tisbury	200
Tisbury CA remainder	220
Tisbury CA Total	420
<b>SOUTH WILTSHIRE HMA</b>	<b>10,420</b>

**Figure 4: Community Area Indicative Requirements**

<sup>5</sup> Totals for Royal Wootton Bassett & Cricklade CA remainder and Royal Wootton Bassett & Cricklade CA exclude any development at the West of Swindon.

- 2.18 There is no requirement for each individual Community Area or settlement to have five years supply of land for housing. Furthermore, paragraph 4.30 of the WCS makes clear that:

*“The disaggregation to Community Areas set out above is not intended to be so prescriptive as to be inflexible and potentially ineffective in delivering the identified level of housing for each market area. It clarifies the council’s intentions in the knowledge of likely constraints in terms of market realism, infrastructure and environmental capacity. They provide a strategic context for the preparation of the Housing Sites Allocation DPD and in order to plan for appropriate infrastructure provision.”*

- 2.19 There are a number of sources for new homes to meet the requirements of Core Policy 2. They include:

- strategic allocations made within the WCS
- retained Local Plan allocations
- existing commitments
- regeneration projects, for example, those in Chippenham, Trowbridge and Salisbury
- neighbourhood plans
- windfall

- 2.20 The allocations shown in the Plan will supplement these existing sources to ensure a surety of supply over the plan period.

## **Relationship with Neighbourhood Planning**

- 2.21 There are at the moment over sixty Neighbourhood Plans either being prepared or completed in Wiltshire and many more plans are likely over the years ahead. Many of these involve identifying land to meet the need for new homes. Their role in meeting housing requirements will become more significant alongside the Plan.

- 2.22 It is a priority of both Government and the Council that planning controls pass to local communities so they can develop their own local vision of sustainable development. Parish and Town Councils have been consulted on the review of settlement boundaries. The work being done on Neighbourhood Plans influences the selection of sites<sup>6</sup> and where Neighbourhood Plans have been ‘made’ or are well advanced the Plan leaves decisions on the scale and locations for growth in settlements to the communities concerned.

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<sup>6</sup> See stage 4a of the Housing Delivery Strategy below.

- 2.23 In other locations, there may not yet be an appetite to prepare a Neighbourhood Plan or plans are at early stages of development. In these cases the Plan has considered how those settlements can accommodate additional housing and has allocated sites. In these cases, the priority to ensure a surety of housing land supply has taken precedence.

## 3. Plan Objectives

- 3.1 Three objectives carry out the two purposes of the Plan to review settlement boundaries and allocate sites for housing development.

### Settlement Boundary Review

- 3.2 The first objective for the Plan is to review settlement boundaries:

**Objective 1: To ensure there is a clear definition to the extent of the built up areas at principal settlements, market towns, local service centres and large villages**

The Plan applies one consistent methodology for the County to replace the different ways used by the previous District Councils. The Council has developed this methodology in consultation with Parish and Town Councils. The process is explained in detail in Topic Paper 1: Settlement Boundary Review Methodology.

The result of the review and proposed changes to settlement boundaries is discussed in Chapter 6 and shown in the appendix to the Plan.

### Housing Site Allocations

- 3.3 The Plan allocates sites for housing development to ensure enough land is allocated to deliver the minimum requirements of each housing market area. In so doing, the Plan has been prepared to achieve two further objectives:

**Objective 2: To help demonstrate a rolling five year supply of deliverable land for housing development - a duty on each Local Planning Authority required by the National Planning Policy Framework.**

The Plan must identify a number of greenfield sites involving the loss of countryside in order to achieve this objective. Land within settlements, in particular previously developed land, is acceptable for housing redevelopment in principle. A realistic allowance is included for this source of new housing when calculating the scale of land supply<sup>[1]</sup>. But within a predominantly rural area there is a limited amount of previously developed land. Not only are such opportunities limited, they can also be difficult to rely on as a large proportion of overall supply.

**Objective 3: To allocate sites at the settlements in the County that support the spatial strategy of the Wiltshire Core Strategy. The spatial strategy for Wiltshire contained in the Core Strategy promotes the sustainable development of the County.**

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<sup>[1]</sup> See Topic Paper 3 Housing for an explanation of how a windfall allowance has been estimated for each HMA. The approach accords with guidance contained in paragraph 48 of the NPPF.

The spatial strategy describes a hierarchy of settlements within the County. Each tier recognises the particular role of those settlements and plans a level of new housing development that is appropriate. Chippenham, Salisbury and Trowbridge, are Principal Settlements supported by a number of Market Towns. Development at Large and Small Villages should accommodate local needs. Local Service Centres have also been identified that have a more pronounced role than villages. They possess a level of facilities and services that provide the best opportunities outside the Market Towns for sustainable development.

The Site Selection Methodology Process contained in Topic Paper 2, explains in detail the methodology for identifying site allocations to meet these two objectives. The selection process and its results are summarised in the following 'Housing Delivery Strategy' section. Housing Allocations are explained and set out in chapter 5 of the Plan.

## 4. Housing Delivery Strategy

### How many homes are needed and where?

- 4.1 The WCS divides housing provision between the three Housing Market Areas. The vast proportion of housing needed over the plan period has already been built or is already committed.

	Minimum Housing Requirement	Completions 2006-2017	Developable commitments 2017-2026	Minimum to be allocated
East Wiltshire HMA	5,940	3,497	2,273	170
North and West Wiltshire HMA	24,740	12,603	11,566	571
South Wiltshire HMA	10,420	5,067	4,759	594

**Figure 5: Housing Market Areas: Minimum to be allocated**

- 4.2 The figures above show a minimum to be allocated, but a surplus is necessary to maintain five years supply of housing land in each HMA and to surpass the buffer in excess of five years required by the NPPF.
- 4.3 In order to deliver the spatial strategy, the priority for housing land allocations has been to focus on those higher tier settlements that have not yet met or contributed towards indicative levels of provision (Principal Settlements, Market Towns and Local Service Centres). This supports the sustainable

development of the County sought by Objective 2 of the Plan. These settlements where allocations are justified are:

Housing Market Area	Principal settlement, market towns and local service centres
East Wiltshire Housing Market Area	Tidworth and Ludgershall Market Lavington
North and West Wiltshire Housing Market Area	Trowbridge Warminster
South Wiltshire Housing Market Area	Salisbury Amesbury, Bulford and Durrington

**Figure 6: Higher tier settlements where allocations were made**

4.4 The WCS proposes much more modest levels of housing provision at Large Villages as reflected in the indicative scales of housing for each community area. Some new development, to meet local needs, may be appropriate at some of the designated Large Villages within these rural areas either through sites allocated in the Plan or by Neighbourhood Plans produced by the local community.

4.5 No allocations are made at Large Villages in the East Wiltshire HMA because there is no strategic priority to do so due to the level of completions and supply committed within the HMA. Housing to meet local needs can be identified where necessary through neighbourhood planning. Neighbourhood planning will also supplement supply in the other two HMAs. No suitable sites were available at Large Villages in the South Wiltshire HMA and therefore the Plan makes no allocations in that area either. The Plan makes allocations at Large Villages only in the North and West Wiltshire HMA. These involve the following Community Areas:

Housing Market Area	Large Villages
North and West Wiltshire Housing Market Area	Chippenham Community Area Remainder Malmesbury Community Area Remainder Warminster Community Area Remainder Westbury Community Area Remainder

**Figure 7: Community Areas where allocations were made at Large Villages**

### How were sites selected?

4.6 A separate topic paper explains the Council’s approach to site selection<sup>7</sup>. It is summarised below:

<sup>7</sup> Topic Paper 2: Site Selection Process Methodology, Wiltshire Council (June 2017)

### **Stage 1: Areas of Search**

- 4.7 The selection process identifies land for house building that supports the distribution and indicative levels of housing set out in the Wiltshire Core Strategy. Site selection prioritises allocating housing sites at those main settlements and areas where land supply needs to be supplemented in order to meet those levels. The outcome of stage one therefore defined 'areas of search' where sites do need to be selected (see above).

### **Stage 2: Strategic Assessment**

#### *2A: Exclusionary criteria*

- 4.8 All councils are required to maintain a register of land that has been put forward for development. This is referred to as the Strategic Housing Land Availability Assessment (SHLAA)<sup>8</sup>. Within areas of search the SHLAA provides a pool of land opportunities for possible housing development.
- 4.9 Other land, not included in the SHLAA, may possibly be capable of development but because neither a developer nor landowner has promoted the site for development, the site cannot be said to be available or developable within the plan period. It cannot be counted on to supplement housing land supply and therefore, for the Plan to be effective, land other than SHLAA sites has not been considered for inclusion. SHLAA sites were therefore the basic building blocks of the Plan, but they simply amount to land put forward for development.
- 4.10 This does not mean any particular site is developable or suitable for development; either in part or whole. There may be a number of barriers to development ruling out their suitability. SHLAA sites may include land with areas at risk of flooding or ecological or historic sites that are important to protect. A strategic assessment tested each SHLAA site against a number of such constraints and criteria including whether a site was already committed for development or within the urban area.
- 4.11 Some sites were also detached from a settlement with no prospect of forming a part of its existing built up area. Where housing development involves encroachment into the countryside it should take place in a way that expands an existing built up area in order to prevent unnecessary loss of open countryside and so that new homes are directly-related to the community.
- 4.12 SHLAA sites were rejected or a reduction in their area (capacity) noted because one or more of these considerations applied to part or the whole leaving a smaller set of potential sites within areas of search.

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<sup>8</sup> Strategic Housing and Economic Land Availability Assessment, Wiltshire Council, (at 1 January 2017)



*2B: Large villages*

- 4.13 The WCS sets down requirements for scales of new housing at each of the County's main settlements. It provides an approximate scale of anticipated housing development for the surrounding rural hinterland of each community area. These areas contain several rural settlements (large and small villages and in some instances Local Service Centres) that do not have individually set levels of development. The spatial strategy requires new housing development at these Large and Small Villages to be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. Some rural settlements are designated as Local Service Centres where levels of facilities and local employment suggest greater potential for growth and self-containment.
- 4.14 Opportunities at some Large Villages have not been explored because local housing needs for the plan period have already been accommodated; either through development that has already taken place or that is planned. Further development brought about by new plan allocations would be in excess of meeting local needs and result in conflict with WCS Core Policy 1. SHLAA sites at these Large Villages were not therefore considered reasonable alternatives.
- 4.15 The future development of some Large Villages has already been thoroughly considered by Neighbourhood Plans. Neighbourhood planning addresses the housing needs of a settlement in accordance with Core Policy 1 of the WCS. It is unnecessary for the Plan to supplement local consideration and SHLAA sites at Large Villages where Neighbourhood Plan preparation is at an advanced stage are not considered reasonable alternatives.
- 4.16 Housing development at Small Villages is required to take the form purely of limited infill. House building will be small in scale, for sites of single figures, and the Plan does not seek to identify such sites.
- 4.17 Based on an assessment of these factors, a number of Large Villages were excluded from further consideration and potential sites at these Large Villages were therefore rejected.

**Stage 3: Sustainability Appraisal**

- 4.18 After a high level assessment, remaining potential sites have been assessed using sustainability appraisal (SA). This is a transparent and systematic way of carrying out a detailed assessment of the sustainability performance of all the remaining site options using a sustainability appraisal framework.
- 4.19 The sustainability appraisal framework contains 12 objectives that cover the likely environmental, social and economic effects of development. The performance of each site was assessed against each of the objectives using a consistent set of decision-aiding questions. The objectives and decision aiding questions resulted from consultation on a scoping report. The

appraisal used common evidence and the process therefore ensured a transparent, consistent and equitable comparison of all reasonable alternatives.

- 4.20 Where potential sites were rejected, the reasons for doing so are clearly stated. Other sites were divided into 'more sustainable' and 'less sustainable' site options.

#### **Stage 4: Selection of Preferred Sites and developing plan proposals**

##### *4A: Selection of preferred sites*

- 4.21 The focus for further work was the set of 'more sustainable' sites identified at stage 3. Further consultation with stakeholders helped to develop potential sites into site options with individual housing capacities and specific boundaries. Consultation also helped to identify requirements that should be highlighted for individual site options, to guide the form development should take, including the definition of realistic site boundaries. In exceptional circumstances, it was necessary to consider 'less sustainable' sites.

##### *4B: Developing Plan Proposals*

- 4.22 Previous stages assessed individual sites. Together the total amount of housing proposed in the Plan should aim to ensure overall supply at least meets housing market area requirements. The form housing land supply takes should also provide for a demonstrable five year supply of land for each year in the plan period. Therefore shortcomings in terms of the total number of dwellings, the components of supply and its timing may require previous stages to be revisited, possibly in order to expand areas of search and the number of potential site options. Topic Paper 4: 'Developing Plan Proposals' considers these issues for each HMA in turn.
- 4.23 This stage also checked how all the draft allocations together fitted with the spatial strategy; in terms of the overall distribution of housing growth; the approach to rural areas; and the role of Principal Settlements and Market Towns. Where there is a shortfall at any Market Town or Principal Settlement then there is an assessment of possible impact in terms of the wider area and measures for the future are suggested to address those potential effects.
- 4.24 The rationale for the Plan is to supplement housing land supply. This is a strategic priority stemming from the WCS. The spatial strategy expects development at Large Villages to respond to local needs. At the same time it is Government and the Council's wish to give direct power to local communities to articulate their own visions for their area, to define and respond to their own local need. Therefore, in the absence of a strategic priority, where land supply can meet objectives of the Plan without allocating sites at villages then it should not. This stage has therefore specifically reviewed the purpose and the case for making allocations at Large Villages.

### **Stage 5 Viability Assessment**

- 4.25 Viability assessment has verified that preferred sites and the scale of development identified in the Plan would not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. It also shows that preferred sites are capable of providing policy compliant levels of affordable homes. Assessment has been carried out by independent experts on this aspect and their report has been published separately (Topic Paper 5: Assessment of Viability).

### **Stage 6: Sustainability Appraisal of Plan Proposals and Habitats Regulation Assessment**

- 4.26 Following completion of the viability assessment, a final stage of sustainability appraisal was undertaken on draft policies within the Plan and further refinements were necessary to improve mitigation measures to see that the Plan delivers the most sustainability benefits possible. This stage of the assessment considered the impact of the Plan as whole; its cumulative effects.
- 4.27 In terms of biodiversity, the impact of potential sites on European Designations is an important factor in the selection of preferred sites. The Plan as a whole however is also required through the Habitats Directive and the Conservation of Habitats and Species Regulations 2010 (as amended), to consider if it may have a likely significant effect on European Sites either alone or in combination with other plans or projects. The Appropriate Assessment concludes that the Plan will not have adverse effects on the integrity of any European Sites. The reasons for this conclusion have been published separately in the Habitats Regulations Assessment.

### **Summary of Site Allocations**

- 4.28 Each Community Area Topic Paper considers whether it is appropriate to allocate sites for housing development, based on the remaining requirements for that community area, and justifies the selection of particular sites. In summary the Plan allocates the following sites in each HMA.

*East Wiltshire Housing Market Area*

Settlement	SHLAA reference	Site Name	Approximate dwellings
Market Lavington	1089	Southcliffe	15
	2055/530	Underhill Nursery	50
	3443	East of Lavington School	15
Ludgershall	553	Empress Way	270 <sup>9</sup>

**Figure 8: East Wiltshire HMA - summary of allocations***North and West Wiltshire Housing Market Area*

Settlement	SHLAA reference	Site Name	Approximate dwellings
Hullavington	690	The Street	50
Yatton Keynell	482	East of Farrells Field	30
Crudwell	3233	Ridgeway Farm	50 <sup>10</sup>
Trowbridge	613	Elm Grove Farm	200
	1021	Church Lane	45
	3260	Upper Studley	20
	298	Land off the A363 at White Horse Business Park	150
	3565	Southwick Court	180
	297/263	Elizabeth Way	205
Warminster	603	East of the Dene	100
	302/1032	Bore Hill Farm	70
	304	Boreham Road	30
Chapmanslade	316	Barthers Farm Nurseries	35
Bratton	321	Court Orchard / Cassways	40

**Figure 9: North and West HMA - summary of allocations***South Wiltshire Housing Market Area*

Settlement	SHLAA reference	Site Name	Approximate dwellings
Durrington	3154/S98	Clover Lane	45 <sup>11</sup>
Durrington	3179	Land off Larkhill Road	15
Salisbury	S1028	Land at Netherhampton Road	640
Salisbury	S61	Land at Hilltop Way	10
Salisbury	S1027	North of Netherhampton Road	100

<sup>9</sup> This total includes 109 dwellings that already have planning permission<sup>10</sup> This total includes 10 dwellings that already have planning permission<sup>11</sup> This total includes approximately 15 dwellings that already have planning permission

Salisbury	3272	Rowbarrow	100
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**Figure 10: South HMA - summary of allocations**

4.29 These site allocations for each HMA meet two objectives of the Plan (Objectives 2 and 3):

- To help demonstrate a rolling five year supply of deliverable land for housing development.
- To allocate sites at the settlements in the County that support the spatial strategy of the Wiltshire Core Strategy.

## Objective 2: Housing Land Supply

4.30 In addition to allocations in the WCS and the Plan as well as sites with planning permission, the Council has made an allowance for windfall sites in the five year supply. With sites allocated in this plan, overall provision for new housing in each HMA is as follows:

Housing Market Area (HMA)	Minimum Housing Requirement	Completed (2006-2017)	Commitments (2017-2026)	Windfall Allowance (2017-2026)	Plan allocations (2017-2026)	TOTAL	Surplus
East Wiltshire	5,940	3,497	2,273	811	241	6,822	882
North and West Wiltshire	24,740	12,603	11,566	2,086	1,195	27,450	2,710
South Wiltshire	10,420	5,067	4,759	736	795	11,357	937

**Figure 11: HMA housing land supply 2006 -2026**

4.31 The Plan helps to provide for the amount of housing required by the WCS. Plan preparation has also looked at the likely timings of construction of the various land sources using trajectories of dwelling completions (housing trajectories). The results are reported in Topic Paper 4: Developing Plan Proposals. This assesses how the Plan achieves a sufficient supply in each year over the plan period in order to meet the objective of ensuring a five year supply of deliverable land for each of the remaining years of the WCS plan period to 2026.

4.32 Housing trajectories are site by site estimates of start and finish dates and annual completions. Aggregating housing trajectories for each HMA shows how the Plan helps to deliver in excess of five years supply of land in each area for the remaining years of the plan period. The table below provides estimates of how many years supply there will be in each remaining year of the plan period. It shows supply exceeds the five year requirement through to

the end of the plan period for all years except one in the South Wiltshire HMA and well before then additional allocations will be included within the review of the WCS.

HMA	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
East Wiltshire	9.18	9.11	9.75	12.20	22.44	20.18	14.01	9.81	7.45
North and West Wiltshire	7.15	7.54	7.64	7.54	7.85	7.92	7.48	6.54	5.30
South Wiltshire	6.09	6.30	6.43	6.65	6.88	7.13	6.70	5.87	4.75

**Figure 12: HMA Five year land supply estimates 2017 – 2026**

- 4.33 To be sure of maintaining a surety of supply, the annual estimates should exceed the five years and buffer required by planning policy. A surplus is important to allow for any possibility of under delivery in the future.

### **Objective 3: Spatial Strategy**

- 4.34 The scale and distribution of site options at each settlement should also be consistent with that proposed by the spatial strategy in the WCS. A shortage of new housing and infrastructure for instance will limit provision for affordable homes, could depress economic growth and undermine the viability and vitality of town centres. On the other hand, widespread over provision, particularly toward smaller rural settlements, might undermine the spatial strategy. A symptom of this would be over burdened local infrastructure and greater environmental impacts from more travelling between settlements and more widespread loss of countryside.
- 4.35 It would not, however, be reasonable to expect the distribution and scale of land supply to adhere rigidly to the levels set in the core strategy. It would be unrealistic to expect as much. The WCS explains that levels are indicative and that there needs to be some flexibility.
- 4.36 Levels of housing development in settlements and rural areas are indicative levels of growth. They are approximate and neither minimum or maximums; instead they are an indication of the general scale of growth appropriate for each area and settlement during the plan period.
- 4.37 The following sections describe the relationship between the distribution of housing development (including the site allocations) and the spatial strategy for each of the County’s HMAs.

#### *East Wiltshire Housing Market Area*

- 4.38 The table below compares indicative with proposed levels of growth in each community area:

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	TOTAL	% Variation
<b>Urban areas</b>					
Devizes	2,010	1,447	689	2,136	6.3%
Marlborough	680	357	306	663	-2.6%
Tidworth and Ludgershall	1,750	728	1,109	1,836	5.0%
<b>TOTAL</b>	<b>4,440</b>	<b>2,532</b>	<b>2,103</b>	<b>4,635</b>	<b>4.4%</b>
<b>Rural areas</b>					
Devizes CA remainder	490	286	182	468	-4.5%
Marlborough CA remainder	240	160	46	206	-14.1%
Pewsey CA	600	426	179	605	0.9%
Tidworth CA remainder	170	93	3	96	-43.5%
<b>TOTAL</b>	<b>1,500</b>	<b>965</b>	<b>410</b>	<b>1,375</b>	<b>-8.3%</b>

**Figure 13: East Wiltshire HMA - distribution of housing development 2006-2026**

- 4.39 The overall pattern of growth is in general conformity with the WCS. It is consistent with the principles of the spatial strategy. Compared to indicative levels, development is focussed slightly more on the Market Towns (+4%) and less on the rural settlements (-8%).
- 4.40 Indicative levels of housing for Market Towns are not a ceiling and a variance would not seem to present new or significant issues for local infrastructure and environmental capacity.
- 4.41 Similarly, variations from the spatial strategy do not appear to give rise to significant issues. The rural area around Tidworth contains two designated Large Villages. Collingbourne Ducis has experienced above average growth since 2006. This would seem sufficient to help maintain its role. Netheravon has several brownfield sites that are potentially suitable for redevelopment and these possibilities would be best explored through a neighbourhood planning process.
- 4.42 A number of rural communities within the HMA are developing a local vision for the sustainable development of their settlement using neighbourhood planning<sup>12</sup>. These will address local needs, including needs for new homes, and they will progress further allocations to include housing that will contribute

<sup>12</sup> Community Area Topic Papers summarise progress on neighbourhood planning



to supply. Neighbourhood plans will be a main means to sustain the roles of Large Villages described in the spatial strategy.

- 4.43 The distribution of housing development accords with the underlying principles of the WCS to direct development to the most suitable, sustainable locations.

*North and West Wiltshire Housing Market Area*

- 4.44 The table below compares indicative with proposed levels of growth in each community area:

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	TOTAL	% Variation
<b>Urban areas</b>					
Bradford on Avon	595	387	212	599	1%
Calne	1,440	961	807	1,768	23%
Chippenham	4,510	1,204	3,819	5,023	11%
Corsham	1,220	646	587	1,233	1%
Malmesbury	885	560	455	1,015	15%
Melksham and Bowerhill	2,240	1,370	1,221	2,591	16%
Royal Wootton Bassett	1,070	997	158	1,155	8%
Trowbridge	6,810	2,965	2,625	5,590	-18%
Warminster	1,920	603	1,055	1,658	-14%
Westbury	1,500	877	931	1,808	21%
<b>TOTAL</b>	<b>22,190</b>	<b>10,570</b>	<b>11,871</b>	<b>22,441</b>	<b>1%</b>
<b>Rural areas</b>					
Bradford on Avon CA remainder <sup>1</sup>	185	119	72	191	3%
Calne CA remainder	165	92	153	245	49%
Chippenham CA remainder	580	409	113	522	-10%
Corsham CA remainder	175	255	96	351	101%
Malmesbury CA remainder	510	336	144	480	-6%
Melksham CA remainder	130	101	38	139	7%
Royal Wootton Bassett and Cricklade CA remainder <sup>2</sup>	385	315	150	465	21%
Trowbridge CA remainder	165	255	23	278	69%
Warminster CA remainder	140	90	53	143	2%
Westbury CA remainder	115	61	47	108	-6%
<b>TOTAL</b>	<b>2,550</b>	<b>2,033</b>	<b>890</b>	<b>2,923</b>	<b>15%</b>

**Figure 14: North and West HMA - distribution of housing development 2006-2026**



- 4.45 There are marked differences in the anticipated growth of Calne and Westbury over the plan period compared to the two Principal Settlements of the HMA, Chippenham and Trowbridge.
- 4.46 Growth at Chippenham and Trowbridge has not matched expectations. Land has been in short supply or delayed in coming forward. As Principal Settlements within the HMA they are intended to be the primary focus for development, providing significant levels of jobs and homes.
- 4.47 In contrast, rates of development at most Market Towns have met expectations and at Bradford on Avon, Calne, Malmesbury, Melksham, Royal Wootton Bassett and Westbury anticipated levels of growth have been exceeded over the first half of the plan period. Land has been available and some additional sites granted consent by planning appeals. Over the same interval, scales of development within rural areas in many places have also exceeded those anticipated by the WCS.
- 4.48 Indicative levels of housing for Market Towns are not a ceiling and variations would not seem to present new or significant issues for local infrastructure and environmental capacity. Allocations made in the Plan are made to support the spatial strategy. It is not however practical for the Plan to completely re-dress imbalances in the distribution of development from what the spatial strategy envisaged. A review of the WCS is also the appropriate means to properly consider the performance and longer term prospects of settlements.
- 4.49 Chippenham however is now likely to exceed the minimum scale of growth anticipated in the WCS by higher rates of house building in the last half of the plan period compared to much lower rates over recent years. This will come about in large part as a result of significant allocations for housing development made in the Chippenham Site Allocations Plan.
- 4.50 Until very recently there has been a shortage of development opportunities in the town. It is difficult to substantiate a direct connection, but this shortage may also have contributed to the higher than anticipated rates of development experienced by Calne, neighbouring Chippenham. Higher rates of development than expected cause concern about the adequacy of local infrastructure to support population growth and about environmental impacts. No allocations are proposed in the Plan for Calne or Corsham.
- 4.51 Symptoms of similar circumstances appear to be apparent with regard to Trowbridge as at Chippenham, although there would not appear to be such a pronounced shortage of land at Trowbridge.
- 4.52 Unlike Chippenham however, allocations made by the Plan will not be sufficient to ensure that housing provision meets indicative requirements. Six new site allocations provide land for approximately 800 dwellings.

Nevertheless, housing development at Trowbridge will fall short of the WCS indicative level of 6,810 dwellings by around 1,220.

- 4.53 One main reason for a shortfall in land supply is the complexity and consequent delay developing Ashton Park, a south eastern extension to the town. 1,600 dwellings will be built on this site in the plan period and a further 1,000 post 2026; rather than first envisaged that the whole of the allocation would have been completed in the plan period. This can be seen to account for 1,000 of the 1,220 dwelling shortfall.
- 4.54 A second main reason for a shortfall has been the inability to identify enough land free from environmental constraints that could compensate for the consequences of delay to Ashton Park. Designated Green Belt provides long term protection from development and limits the scope for Trowbridge to expand. Ecological constraints result from the need to safeguard habitats for protected bats. Other options are limited for different reasons.
- 4.55 In addition, to meet Plan objectives, land identified should be capable of development within the plan period. Unlike Salisbury, there are no reserve locations or areas of search. At this stage, substituting one complex site by another would not provide a remedy to a relatively short-term issue.
- 4.56 Looking over the plan period there has not been as dramatic a fall off in dwelling completions at Trowbridge as took place at Chippenham. The Plan allocations provide choice and flexibility as well as add to supply. The shortfall compared to an indicative level is not so severe as to jeopardise the position of Trowbridge as a Principal Settlement or undermine objectives of the spatial strategy. The WCS makes clear that indicative requirements for community areas provide context and are not prescriptive. A lower provision over the shorter term represents the flexibility associated with the indicative nature of the requirements of the WCS.
- 4.57 Both Westbury and villages around Trowbridge have experienced higher than anticipated rates of growth. The WCS has the objective of consolidating growth at Westbury and this plan makes no additional allocations for housing development.
- 4.58 Allocations of the Plan at Large Villages in the HMA are made only at those settlements where indicative levels will not be met and where local needs are not being addressed through neighbourhood planning. As well as being necessary to help ensure a surety of supply, these allocations will help to support the role of those Large Villages, supporting a range of local employment, services and facilities.
- 4.59 The scale of development at Warminster is not envisaged to meet indicative strategic requirements. Three proposals of the Plan improve choice in the Town. Constraints include flood risks and managing phosphate levels that can affect the River Avon Special Area of Conservation. The West Urban

Extension, a strategic site in the WCS, provides by far the largest part of new housing to serve the town and this area will continue to do so for several more years after 2026. It provides a longer term surety of supply that supports the role and function of the town.

- 4.60 Constraints to Trowbridge's longer term growth will be addressed as part of the review of the Core Strategy that will look from 2016 beyond 2026 to 2036. This might include a review of how Green Belt boundaries around the town may affect the town's longer term prospects.
- 4.61 Differences from the pattern of development envisaged by the WCS have arisen over the first half of the plan period. Plan allocations go some way to reversing this, but only so far. Specifically, growth at Trowbridge is more constrained and more difficult to realise than had been envisaged, although not so much as to fundamentally undermine the spatial strategy. Housing provision exemplifies the flexibility made necessary by the indicative nature of community area requirements of the WCS.

#### *South Wiltshire Housing Market Area*

- 4.62 Overall, the scale of development at urban areas matches the intention of the strategy in terms of how much growth is focussed on the main settlements. There are minor differences between indicative and proposed levels that are not significant. They would not present new or significant issues for local infrastructure and environmental capacity. Less provision is made for rural areas.

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	TOTAL	% Variation
<b>Urban areas</b>					
Amesbury, Bulford and Durrington	2440	1,311	1,101	2412	-1%
Salisbury	6,060	2,273	3,833	6,637	10%
Wilton		323	208		
<b>TOTAL</b>	<b>8500</b>	<b>3,907</b>	<b>5,142</b>	<b>9,049</b>	<b>6%</b>
<b>Rural areas</b>					
Amesbury CA remainder	345	179	58	237	-31%
Mere CA remainder	50	37	5	42	-15%
Mere (LSC)	235	126	139	265	13%
Downton (LSC)	190	88	105	193	2%
Tisbury (LSC)	200	170	5	175	-12%
Wilton CA remainder	255	115	11	126	-51%
Southern Wiltshire CA remainder	425	385	78	463	9%
Tisbury CA remainder	220	60	11	71	-68%
<b>TOTAL</b>	<b>1,920</b>	<b>1,160</b>	<b>412</b>	<b>1,572</b>	<b>-18%</b>

**Figure 15: South Wiltshire HMA - distribution of housing development 2006-2026**

- 4.63 The South Wiltshire HMA has a slightly less generous housing land supply than elsewhere in Wiltshire.
- 4.64 Salisbury is the Principal Settlement within the HMA. It is intended to be the primary focus for development, providing significant levels of jobs and homes. Two site allocations of more than 500 dwellings are important to ensuring there is a surety of supply to the end of the period and that the City achieves the role set out in the spatial strategy. Churchfields and land at Netherhampton Road (Salisbury). The first is a strategic site allocated in the WCS. The latter of these, at Netherhampton Road, is an allocation of the Plan.
- 4.65 It is unlikely that all the strategic sites allocated in the WCS for Salisbury would deliver sufficiently within the plan period to meet housing requirements and ensure supply, and therefore land allocated at Netherhampton Road is necessary. A shortage of land could impede the City's prospects and it could also lead to greater development pressures in other settlements in the HMA less suited to growth.
- 4.66 Churchfields is a strategic mixed-use site that Core Policy 20 of the WCS requires to deliver 1100 dwellings by 2026. To be developed, this site requires substantial employment uses to decant and is now expected to commence later than envisaged and much less land for new housing will be available

before 2026. It is a complex regeneration project that will take time to deliver and will require other sites to enable existing businesses to relocate.

- 4.67 The site at Netherhampton Road has the ability to address the lack of housing delivery at Churchfields, later within the plan period, and also the potential to provide employment land for Churchfields businesses to relocate, thereby freeing up land at Churchfields for housing delivery in the longer term. The WCS identifies the site within an area of search, to be considered if further land is required in future to meet housing requirements, as part of the Council's monitoring process. Monitoring has shown that further land is required due to the redevelopment of Churchfields taking longer than anticipated. The Plan therefore implements this contingency in order to ensure a sufficient supply of housing. The allocation of land at Netherhampton Road, a substantial site, will not lead to an increase in the overall scale of housing growth at Salisbury than was proposed by the WCS.
- 4.68 Recognising the scale of the site, a generous lead in time is provided for the delivery of Netherhampton Road. The site is not expected to contribute to housing delivery for several years whilst work is carried out to masterplan the site and develop mitigation measures. In the meantime, supply from major schemes such as Fugglestone Red and Longhedge will ensure sufficient supply. Churchfields and Netherhampton Road sites will deliver new homes alongside each other toward the end of the plan period.
- 4.69 Further sites at Salisbury support provision for primary education in the south of the City. They improve choice. They also help to safeguard land supply should there be unforeseen and serious delay with the delivery of any other sites.
- 4.70 Provision for the rural areas of the HMA can be divided between growth at Local Service Centres and elsewhere, including Large Villages.
- 4.71 Local Service Centres (LSC) are defined as smaller towns and larger villages which serve a surrounding rural hinterland and possess a level of facilities and services that together with improved local employment, provide the best opportunities outside the Market Towns for greater self containment. Levels of housing development envisaged at Mere and Downton fit with that strategy. The level of development proposed for Tisbury is lower. There is a significant brownfield site option under consideration through the neighbourhood planning process that takes priority over consideration of greenfield alternatives. This would meet indicative requirements at the settlement.
- 4.72 In terms of the wider rural area, overall, given the flexibility that should be associated with indicative requirements there is no fundamental conflict with the spatial strategy and proposals are in general conformity with the WCS. There are three Large Villages in the rural area around Tisbury all of which are within the Cranborne Chase and West Wiltshire Downs AONB. The Plan does not propose any allocations because of a variety of constraints and a lack of land availability. In the rural area around Wilton, of the two Large

Villages, Dinton has already experienced relatively significant growth and at Broad Chalke sites are being investigated through the preparation of a Neighbourhood Plan, although the local primary school has limited capacity to support growth. Neighbourhood planning is suited to addressing local needs in these circumstances.

## 5. Housing Site Allocations

### Introduction

- 5.1 By assessing each of the settlements identified in Core Policy 1, a site selection process has produced a range of sites suitable for residential development. Scales of development reflect each site's suitability. They also have regard to the role of a settlement and its size as well as the indicative requirements for housing in each community area, as presented in the WCS. Development will be required to provide for the necessary on-site and, where necessary, off-site infrastructure requirements arising from proposals in accordance with Core Policy 3 (Infrastructure requirements).
- 5.2 The design and form of development will accord with policies of the WCS. Core Policy 57 (Ensuring High Quality Design and Place Shaping) requires a high standard of design of all development.
- 5.3 Landscaping will be provided at boundaries and throughout each site retaining and reinforcing as much as possible of existing hedgerow and tree cover. This will often be required in order to establish a visual boundary to a settlement and so help preserve the settlement's character and appearance in the wider landscape as well as protect the amenity of adjoining uses. Core Policies 51 and 52 are particularly relevant (Landscape and Green Infrastructure). Some sites relate to Areas of Outstanding Natural Beauty and building design, layout and landscaping measures will be necessary to deliver a scheme which positively assimilates within the wider landscape setting and reflects the character of the local vernacular in accordance with requirements of Core Policy 51.
- 5.4 An ecological assessment will be required for all sites. The development will protect and improve opportunities for biodiversity and wildlife corridors within and adjoining the site in accordance with Core Policy 50 (Biodiversity and Geodiversity). Most sites proposed are of more than one hectare, will therefore require flood risk assessment in order to ensure that there is no increase in risk of flooding on site and elsewhere, and will need to comply with Core Policy 67 (Flood Risk) with regard to flood risk.
- 5.5 Development has the potential to affect the significance of a range of heritage assets within or beyond site boundaries. Where necessary a heritage assessment will prescribe measures which will need to be incorporated as part of a scheme in order to protect them, including the importance of their settings. The determination of planning applications will follow the approach set out in National Planning Policy Framework (paragraphs 131 to 135) and satisfy requirements of Core Policy 58 (Ensuring the Conservation of the Historic Environment) of the WCS. This should include archaeological assessment where necessary



- 5.6 Transport impacts from a proposal will also need detailed assessment and accord, in particular, with Core Policy 62 (Development Impacts on the Transport Network). This will include using the highways and transport evidence base. Depending upon the characteristics of individual sites, other policies of the core strategy will be relevant to the determination of planning applications for each of the sites proposed.
- 5.7 The Council will seek a proportion of new homes as affordable housing in accordance with Core Policy 43 (Providing Affordable Homes).
- 5.8 In addition to Community Infrastructure Levy, the Council will also seek funding contributions toward infrastructure or mitigation that is not identified for levy funding and which is directly related to development and necessary for it to proceed. Satisfying the requirements of Core Policy 3 will therefore also be important.
- 5.9 Proposals for new housing sites must be read in conjunction with the Wiltshire Core Strategy and will be considered against all relevant policies, including those relating to place shaping and high quality design. Developers of more substantial sites will also prepare Sustainable Energy Strategies setting out how proposals meet carbon reduction targets, and identifying how maximum targets can be achieved, particularly where lower cost solutions are viable (such as combined heat and power).
- 5.10 Standards for provision to meet leisure and recreation needs of any application will be applied to each of the proposals. An audit of existing open space assets will inform outdoor sports provision. Shortages of amenity green space, parks and areas for informal recreation may be addressed by provision for open space by proposals but will solely be of a form and scale to meet the needs of new development.
- 5.11 As appropriate, additional evidence will need to be prepared at a level of detail to support a planning application. Such new evidence can be used as a material consideration when considering a specific planning application. In many cases, particularly important items are referred to for each allocation. Such evidence may include, but is not limited to a Landscape and Visual Impact Assessment, Heritage Assessment, Biodiversity Report, Surface Water Management Plan, Flood Risk Assessment and Transport Statement.
- 5.12 Sites are proposed at some settlements that involve a mix of uses more than housing development, and where development will be guided by a master plan. The master plan will show parameters governing the distribution of land uses for each site. These sites each have a detailed policy reflecting more extensive site specific requirements setting out the components of development and/or requirements to ensure it takes an acceptable form. These sites are:



Community Area	Site Name	Policy
Tidworth	Empress Way, Ludgershall	H1.1
Trowbridge	Elm Grove Farm, Trowbridge	H2.1
Warminster	East of the Dene, Warminster	H2.7
Chippenham	The Street, Hullavington	H2.10
Salisbury	Netherhampton Road, Salisbury	H3.1

**Figure 16: Plan Site Specific Policies**

## East Wiltshire Housing Market Area

- 5.13 Land for housing development is identified to support the role of settlements in the East Wiltshire HMA, to ensure supply and as well as choice and competition in the market for land.

**Policy H1: Land is allocated for residential development at the following sites, as shown on the policies map:**

**East Wiltshire Housing Market Area**

Community Area	Reference	Site Name	No of dwellings
Tidworth	H1.1	Empress Way, Ludgershall	270
Devizes	H1.2	Underhill Nursery, Market Lavington	50
	H1.3	Southcliffe, Market Lavington	15
	H1.4	East of Lavington School, Market Lavington	15

- 5.14 How these sites were selected is explained in the Community Area Topic Papers<sup>13</sup>.
- 5.15 The specific requirements and form development will take are described below for each site to ensure they are each appropriate in scale and character to their location and in accordance with WCS and national policy.

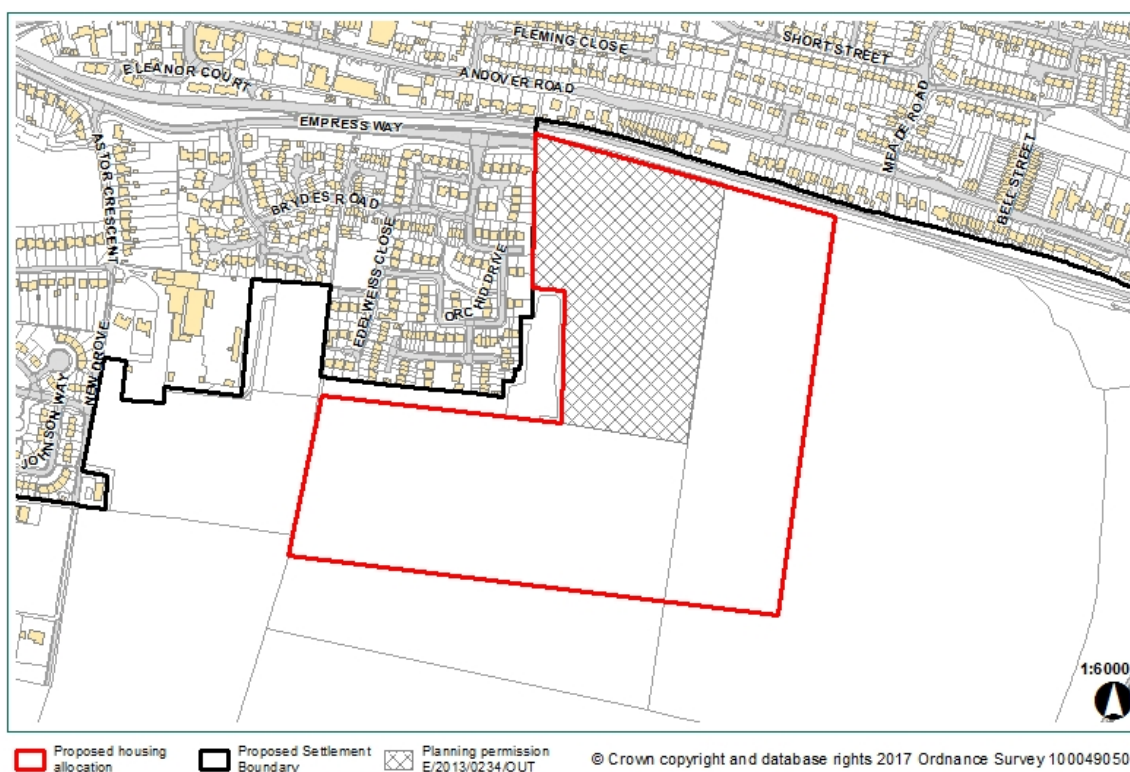
### Ludgershall

- 5.16 Ludgershall is designated as a Market Town and has the potential for significant development. The WCS envisages Ludgershall, together with Tidworth, accommodating approximately 1,750 additional dwellings over the plan period. As a part of the settlement strategy, an increase in jobs and homes in the town will help to enhance services and facilities and promote

<sup>13</sup> Tidworth Community Area Topic Paper, Wiltshire Council ,(June 2017) and Devizes Community Area Topic Paper, Wiltshire Council, (June 2017)

better levels of self-containment and viable sustainable communities (Core Policy 1, WCS). Further development will support it carrying out this role.

### H1.1 Empress Way



**Policy H1.1 Land at Empress Way, as identified on the Policies Map, is proposed for mixed use development comprising the following elements:**

- **approximately 270 dwellings;**
- **a connecting highways link between Empress Way and Simonds Road/New Drove, via the adjoining development at the former Granby Gardens site;**
- **1.8ha of land reserved for a two form entry primary school.**
- **A strong landscape framework including significant screening to the southern and eastern boundaries of the site**

**Development will take place in accordance with a masterplan for the site approved by the Council as part of the planning application process.**

5.17 Approximately 16.5ha of land at Empress Way, as shown on the policies map, are allocated for development. The proposal is to extend land already with permission<sup>14</sup> for housing development to allow for a further 160 dwellings.

<sup>14</sup> Outline planning permission reference E/2013/0234/OUT (land adjacent to Empress Way).

The total amount of development will therefore be 270 dwellings. The treatment and design of the site will be one comprehensive development proposal.

- 5.18 The site is formed of agricultural land on the southern edge of the town. It is a logical extension to the town in an accessible location with regard to local services and facilities but there are limited established natural boundaries that help to enclose the site. There are no field boundaries on the site's southern and eastern edges, although there is limited screening on the boundaries adjoining the railway line and existing residential development.
- 5.19 Vehicular access to the site would be required from Empress Way and via the Granby Gardens development site. Development of the site will include a connecting link road through the site to the two points of access. Transport assessment will inform detailed measures to mitigate impacts on the local road network, including the A342 Andover Road, Memorial Junction and the capacity of the signals on the nearby railway bridge.
- 5.20 Development of the site will include 1.8ha reserved for a 2 form entry primary school. Based on current estimates local primary school capacity will be absorbed by committed development elsewhere in the town. The need to retain the reserved land for a school will be determined as part of the application process based on demand for primary school places at that time.
- 5.21 The site design will be led by a strong landscape framework. Significant additional screening at the southern and eastern site boundaries would be required, along with landscaping and green infrastructure throughout the site as there are middle and long distance views of the site from the south. The final design and layout should be informed by a Landscape and Visual Impact Assessment.

### **Devizes Community Area Remainder**

- 5.22 Market Lavington is designated as a Local Service Centre and, as such, is a focus for modest growth. The village has not grown significantly in recent years and in the remainder of the Plan period additional housing development would support local facilities and contribute to achieving improved self-containment. A total of three sites, as shown on the Policies Map, are allocated for the development of a total of approximately 85 dwellings.
- 5.23 Assessment demonstrates that Market Lavington has two specific considerations to be addressed in order for housing development to be accommodated:

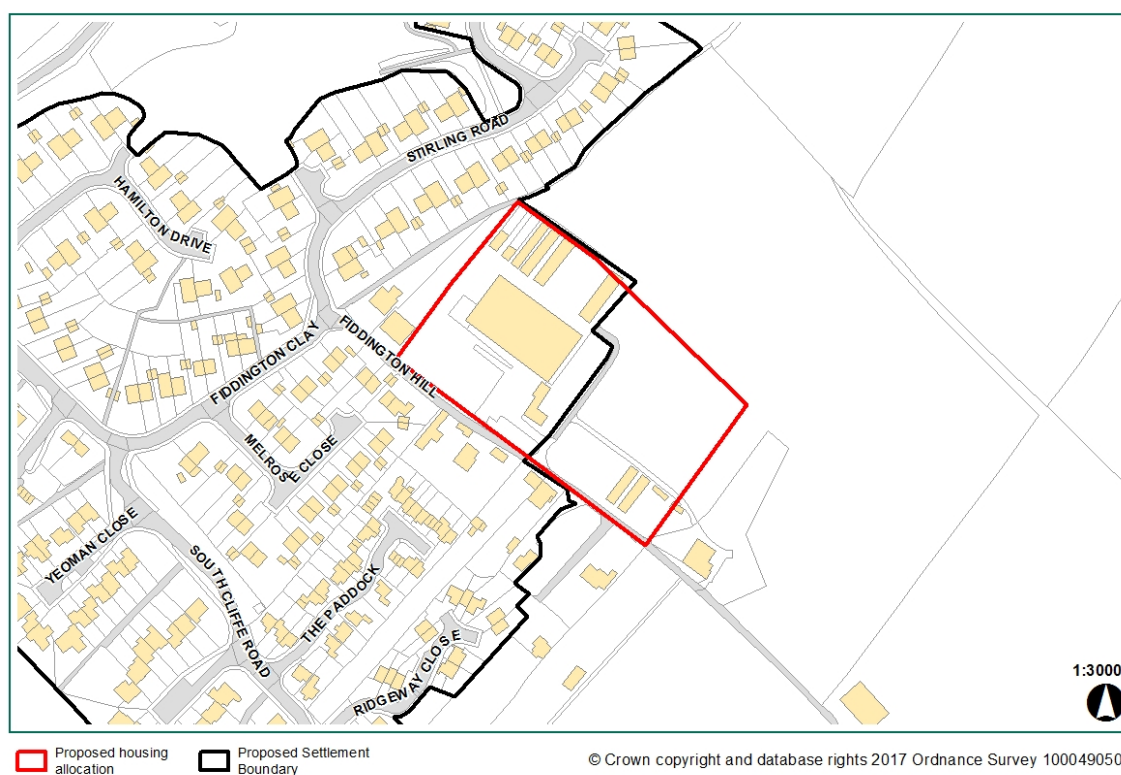
**Surface water management and flood risk:** parts of Market Lavington are affected by surface water flooding during extreme weather events. In part this is due to the village's proximity to the chalk escarpment associated with the Salisbury Plain. Applications for development at Market Lavington will need to

be supported by a comprehensive drainage strategy that ensures the development will be accommodated with improved drainage of the site.

**Traffic:** There are particular concerns about impacts on congestion on the High Street and the crossroads at nearby West Lavington. Where possible, housing schemes should include measures to encourage walking and cycling by improvements to local public rights of way and cycle routes. Measures would result from transport assessment required to accompany planning applications for each site.

- 5.24 All the allocated sites are on the edge of the village and visual impacts on the wider landscape are a consideration as well as the character of approaches to the settlement. Allocations are outside the conservation area but proposals must have regard to the need to preserve and enhance its character, as well as the significance of Listed Buildings.

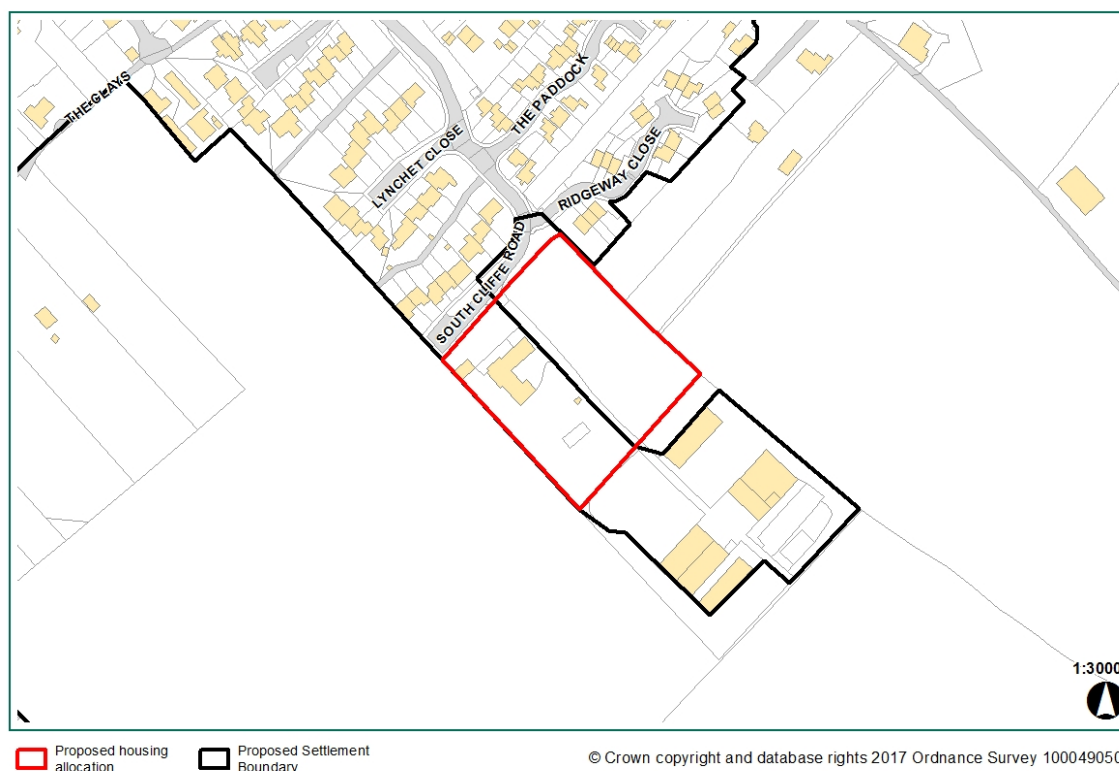
### *H1.2 Underhill Nursery, Market Lavington*



- 5.25 Approximately 2.6ha of land at Underhill Nursery is proposed for the development of approximately 50 dwellings, as identified on the Policies Map. The site is formed from the amalgamation of two SHLAA sites and thereby provides an opportunity to holistically provide a significant level of housing development in a sustainable location, with a consolidated access/egress arrangement, open space and landscaping.

- 5.26 Redevelopment of the former Nursery avoids the premature loss of agricultural land and open countryside. The site is well located with respect to the town centre and facilities such as the primary school and health centre.
- 5.27 Development would need to incorporate measures to address potential impacts on existing residents within the immediate vicinity of the site. This is likely to include, but is not necessarily limited to planting, screening and setting back housing development from the road. Mature trees and hedgerows within the site should be retained and protected as priority habitat. Moreover, all new planting would need to complement and significantly bolster existing patterns of vegetation to soften the south-eastern boundary of the site and increase habitat connectivity.
- 5.28 Development proposals must also demonstrate how the character and distinctiveness of the village, its surrounding countryside and the Salisbury Plain have been taken into account in the design of any layout. Site boundaries would need to be softened through landscaping and planting to reduce the impact of development on surrounding countryside.
- 5.29 Records show the potential for contamination from the site's previous use as a plant nursery, and this will need to be investigated through a land contamination survey and any measures this suggests incorporated in the design and layout of a scheme.
- 5.30 A small area of surface water flooding has affected the site in the past and flood risk assessment will have to pay particular regard to this element including preventing increased risks of flooding off-site.
- 5.31 Medieval remains have been found on and adjacent to the site. Therefore, further investigation and mitigation would be necessary. An archaeological assessment would therefore be required to support any subsequent planning application.
- 5.32 The site is adjacent to the bridleway (MLAV24 / EAST22) which follows the western boundary of the site. In line with the need to encourage sustainable modes of transport and avoid exacerbating parking and congestion along the High Street, comprehensive development of this site (alongside Fiddington Hill) provides an opportunity to upgrade/improve the surface of the bridleway and widen it wherever possible. This would help to meet the demand of new residents to travel to the village centre, thereby providing a direct, traffic-free link for walkers and cyclists through the site.
- 5.33 Part of the site falls within Groundwater Source Protection Zone 2. Therefore the Environment Agency must be consulted on any development proposals in order to inform the scope of mitigation measures.

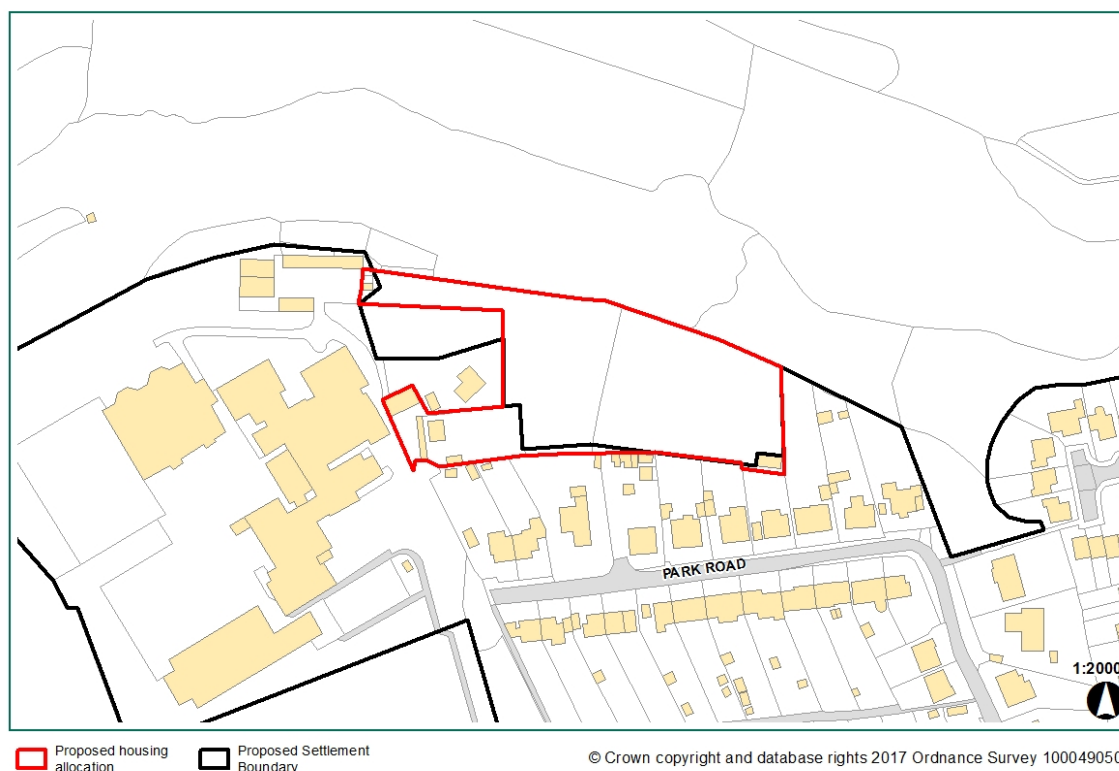
### H1.3 Southcliffe, Market Lavington



- 5.34 Approximately 0.9ha of land at Southcliffe, as identified on the Policies Map, is proposed for development of approximately 15 dwellings. It is within 1km of facilities such as the primary school, health centre and shop.
- 5.35 The site lies between a residential area and business park and a single dwelling currently exists on the site. Impacts of development on the existing residential properties and the business park (and vice versa) would need to be assessed and used to guide detailed design and layout of a comprehensive redevelopment scheme. This site is currently bisected by a road that will be retained in order to maintain access through to the adjacent business park. Mature trees alongside the road are a wildlife corridor and priority habitat. The corridor would be retained in detailed design and layout of a scheme.



### H1.4 East of Lavington School, Market Lavington



- 5.36 Approximately 0.6ha of land to the east of Lavington School, as identified on the policies map, is proposed for development of approximately 15 dwellings.
- 5.37 The site is a field at the north-western edge of the village, adjacent to Manor House Woods County Wildlife Site. Proposals must protect the ecological interest of this designation. Where necessary, mitigation measures will be provided. Mature trees and hedgerows must be retained and additional planting will increase habitat connectivity enhancing biodiversity interest. The site is adjacent to an existing residential area and the school (along with the caretaker's residence). Access to the site would need to be shared with the school. Proposals would need to demonstrate that access arrangements, as well as the housing layout, would not have an adverse impact on the operation of the school. A flood risk assessment would be required and appropriate surface water management measures incorporated. Moreover, impacts of development on existing residential properties (and vice versa) would also need to be assessed through the detailed design and layout process.

## North and West Wiltshire Housing Market Area

- 5.38 Land for housing development is identified to ensure supply, support the role of settlements in the North and West Wiltshire HMA, and improve choice and competition in the market for land.
- 5.39 As a Principal Settlement, the WCS anticipates that Trowbridge will be a primary focus for development. Moreover, the role of the town as a significant employment and strategic service centre will be expected to be strengthened over the Plan period to 2026. Additional allocations are therefore made to support this role.
- 5.40 Other allocations are made at Warminster, a Market Town, to support its role and at designated Large Villages in the rural parts of Chippenham, Malmesbury and Westbury Community Areas geared to support local needs in accordance with WCS Core Policy 2.

**Policy H2: Land is allocated for residential development at the following sites, as shown on the policies map:**

### North and West Wiltshire Housing Market Area

Community Area	Reference	Site Name	No of dwellings
<b>Trowbridge</b>	H2.1	Elm Grove Farm, Trowbridge	200
	H2.2	Land off the A363 at White Horse Business Park, Trowbridge	150
	H2.3	Elizabeth Way, Trowbridge	205
	H2.4	Church Lane, Trowbridge	45
	H2.5	Upper Studley, Trowbridge	20
	H2.6	Southwick Court, Trowbridge	180
<b>Warminster</b>	H2.7	East of the Dene, Warminster	100
	H2.8	Bore Hill Farm, Warminster	70
	H2.9	Boreham Road	30
	H2.10	Barthers Farm Nurseries, Chapmanslade	35
<b>Chippenham</b>	H2.11	The Street, Hullavington	50
	H2.12	East of Farrells Field, Yatton Keynell	30
<b>Malmesbury</b>	H2.13	Ridgeway Farm, Crudwell	50
<b>Westbury</b>	H2.14	Off B3098 adjacent to Court Orchard / Cassways, Bratton	40

- 5.41 How these sites were selected is explained in Community Area Topic Papers.<sup>15</sup>

<sup>15</sup> Trowbridge Community Area Topic Paper, Wiltshire Council (June 2017), Warminster Community Area Topic Paper, Wiltshire Council (June 2017), Chippenham Community Area Topic Paper,



- 5.42 The specific requirements and form development will take are described below for each site to ensure they are each appropriate in scale and character to their location and in accordance with WCS and national policy.

### **Trowbridge**

- 5.43 The WCS envisages approximately 6,810 new dwellings at the Principal Settlement of Trowbridge over the Plan period (2006-2026). Whilst much of this has either been delivered, or is committed in the form of planning permissions and a strategic site allocation in the WCS (Ashton Park), a significant volume of additional housing will be required in order to help address residual indicative requirements.
- 5.44 In the face of the need to identify sites for additional housing at the town, there are significant ecological, landscape (Green Belt) and infrastructure constraints that significantly limit the choice of available sites. Assessment evidence demonstrates three considerations to be addressed in order for housing development to be accommodated:

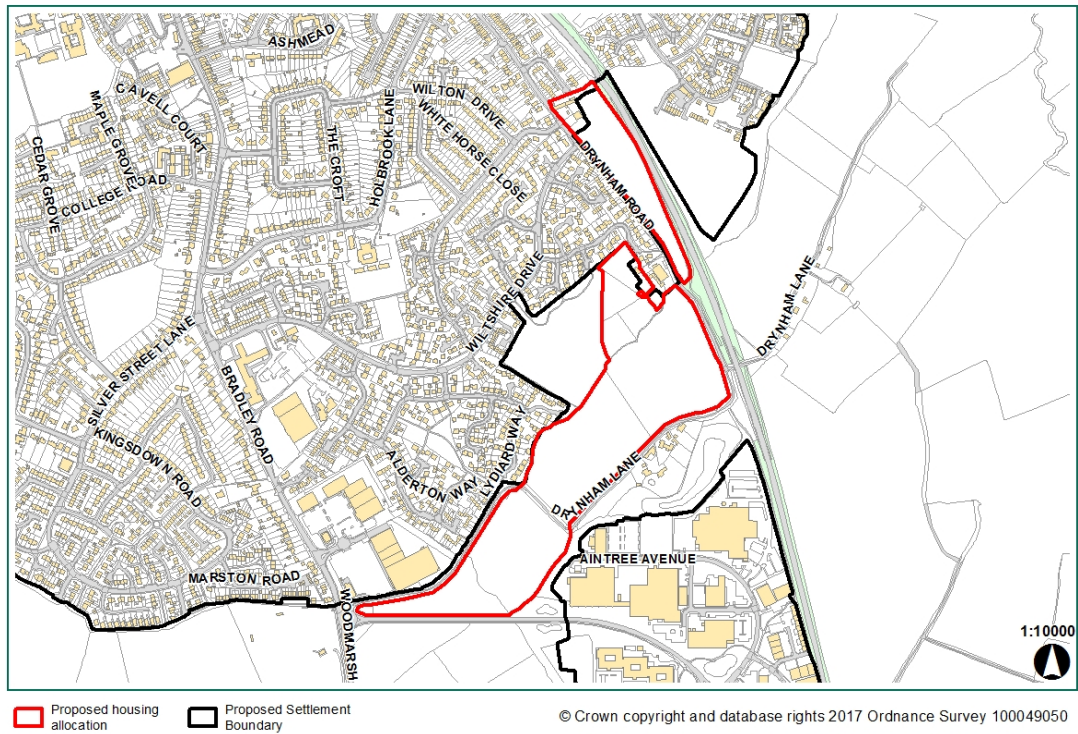
**Ecology:** an interconnected pattern of priority Biodiversity Action Plan (BAP) habitats such as mature hedgerows, trees and water features, along with designated woodland features around the town support significant populations of protected bat species associated with the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC). Additional housing development will increase the population of the town and thereby amplify the risk of recreational pressure on bats. To address this issue, the Habitats Regulations Assessment (HRA) for the Plan recommends developing a strategy for managing recreational pressure across the town. Detailed design and layout of schemes would need to consider additional planting and open space to protect and enhance these BAP priority habitats and thereby augment opportunities for bat foraging routes and roosting sites. This could include establishing dark corridors through sites to protect foraging routes and roosting areas for bats. Specific measures that will be required are explained for each site.

**Education:** development will increase the number of pupils needing primary school places. A local lack of capacity across the town affects proposals allocated for development. With the majority of proposed housing being directed south/south-west of the town, the evidence points directly to the need for a new primary school in this area. Therefore, in addition to land reserved for one new school, funding contributions will be sought from developers to help provide adequate capacity.

**Health Services:** development will also increase demand for primary health care and funding contributions may also be sought to expand the capacity of GP services and dentistry. Contributions will be justified on a site by site basis in discussion with Clinical Commissioning Group and NHS England.

5.45 The proposed site allocations are capable of delivery and will provide a boost to local housing supply.

### H2.1 Elm Grove Farm



**Policy H2.1 Approximately 14.33ha of land at Elm Grove Farm, as identified on the Policies Map, is proposed for mixed use development comprising the following elements:**

- **Approximately 200 dwellings;**
- **At least 1.8ha of land for a two form entry primary school along with playing pitches;**
- **A multi-purpose community facility;**
- **A consolidated public open space area incorporating and augmenting the existing King George VI Playing Field;**
- **A road from the A363 through to an improved junction of Drynham Lane and Wiltshire Drive; and**
- **New cycling and walking routes through the site to link into the existing network and the proposed Ashton Park Strategic Allocation site.**

**Development will take place in accordance with a masterplan for the site approved by the Council as part of the planning application process.**

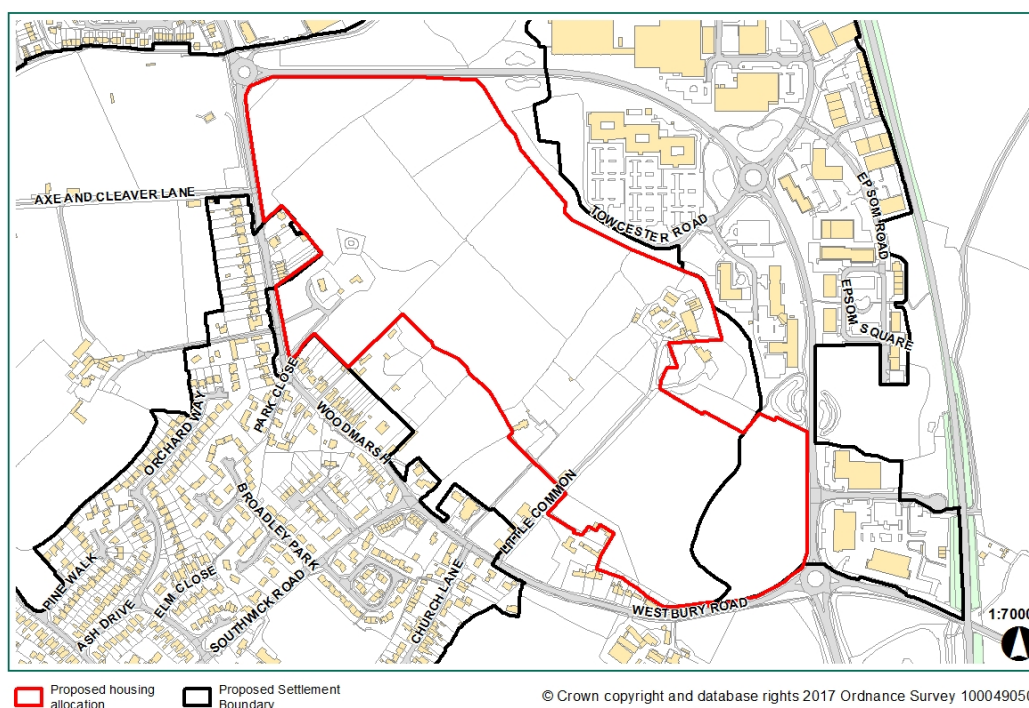
5.46 Approximately 14.33ha of land at Elm Grove Farm is allocated for the development of approximately 200 dwellings, as shown on the Policies Map. It is well located with regard to local facilities and services. Moreover, the site is enclosed to the north-west and south-east by existing development and development proposed further south. Consequently, development of the site would not lead to a significant encroachment of further built form into the countryside. In order to accommodate the educational needs of new development the site would accommodate a new primary school to serve the area alongside new housing. This with a multi-purpose community building geared toward use by sports and social groups in the area could provide a local centre to the development.

5.47 The existing natural features of the site are significant in the landscape and would need to be incorporated within a detailed layout. These features also provide wildlife corridors that link habitat features within the local area; in particular, 'dark corridors' for foraging bats. These elements should be protected and enhanced where possible by additional planting with native species.

5.48 The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on and adjacent to the site. These would include Drynham Lane / Road, the railway line, woodland belts associated with the White Horse Business Park and the small tributary to the River Biss.

- 5.49 These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. Development will be required to contribute towards the delivery of the Trowbridge Recreational Management Mitigation Strategy.
- 5.50 Access to the site would need to be holistically planned with upgrades required to Drynham Lane, along with the construction of a connection to the A363 designed as a through-route anticipating future traffic growth. New and improved walking and cycling routes to existing and planned local services would encourage future residents to use sustainable forms of transport. The site has a medium potential for archaeological remains. Therefore any subsequent planning application should be informed by an archaeological assessment. In addition, development will need to minimise the potential to harm the significance of the Grade II Listed Drynham Lane Farmhouse. Measures may also be necessary to prevent potential noise pollution from the existing main road and railway. These considerations should be addressed through the process of detailed design and layout which should be informed through a Heritage Impact Assessment.
- 5.51 In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town.

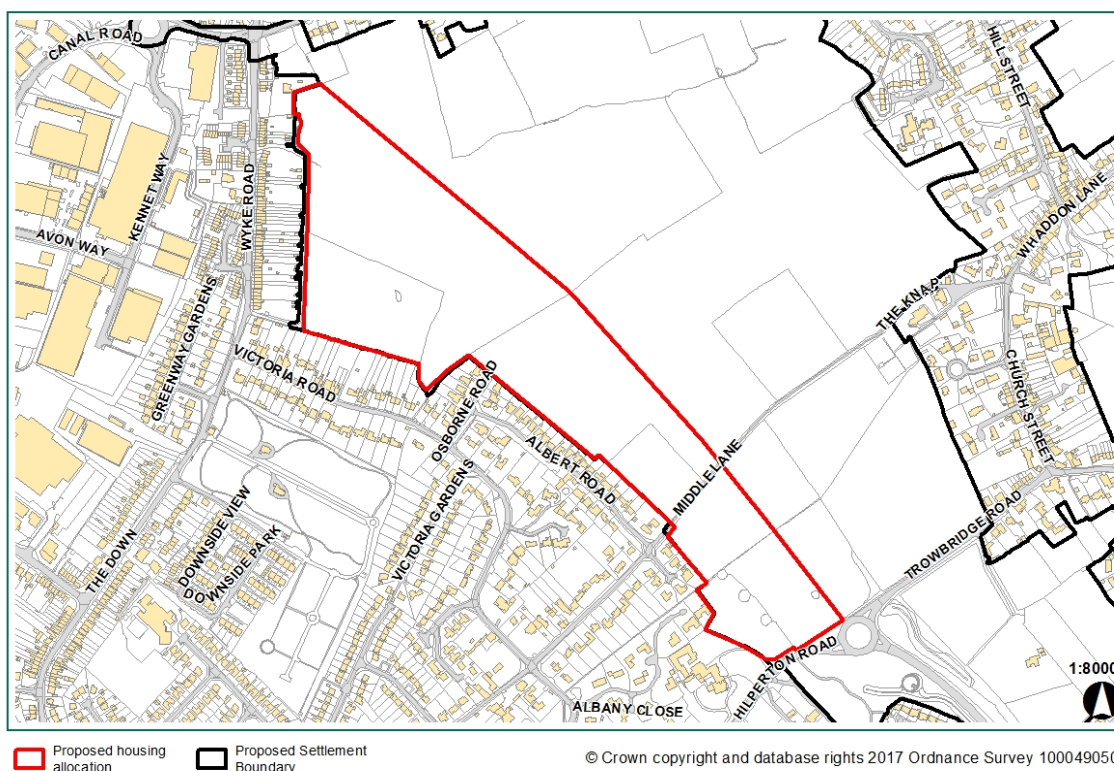
### *H2.2 Land off the A363 at White Horse Business Park*



- 5.52 Approximately 25.26ha of land off the A363 south-west of the White Horse Business Park is allocated for the development of approximately 150 dwellings, as identified on the Policies Map. It is reasonably well located with regard to services and facilities. The site extends over a significant area of agricultural land used for a mix of grazing and arable cropping. It is contained, to a degree, by existing development to the east and west and fronts a 'gateway' route to the town. An objective of detailed design and layout will be to retain visual separation of the Town's urban area from North Bradley village. To achieve this, development proposals would need to be focussed within the north-east of the site, screened with new planting and provide improvements to walking and cycling routes through to the town.
- 5.53 The site is characterised by a distinctive pattern of mature and semi-mature hedgerows and trees that form a feature in the landscape. Development of the site would need to retain these features and thereby provide a layout that respects the setting of North Bradley village as an important element of detailed design. Existing hedgerows and trees also provide habitat for protected and non-protected species. These natural features therefore provide wildlife corridors that link habitat features within the local area; in particular, 'dark corridors' for foraging bats.
- 5.54 The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site include:
- Woodland belts associated with the White Horse Business Park
  - Network of hedgerows
  - Grounds of Willow Grove
- 5.55 These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. Development will be required to contribute towards the delivery of the Trowbridge Mitigation Strategy.
- 5.56 Proposals would need to provide for a high quality, sustainable development that enhances a key gateway approach to the town, whilst protecting the integrity of North Bradley as a village.
- 5.57 In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town.

### *H2.3 Elizabeth Way*

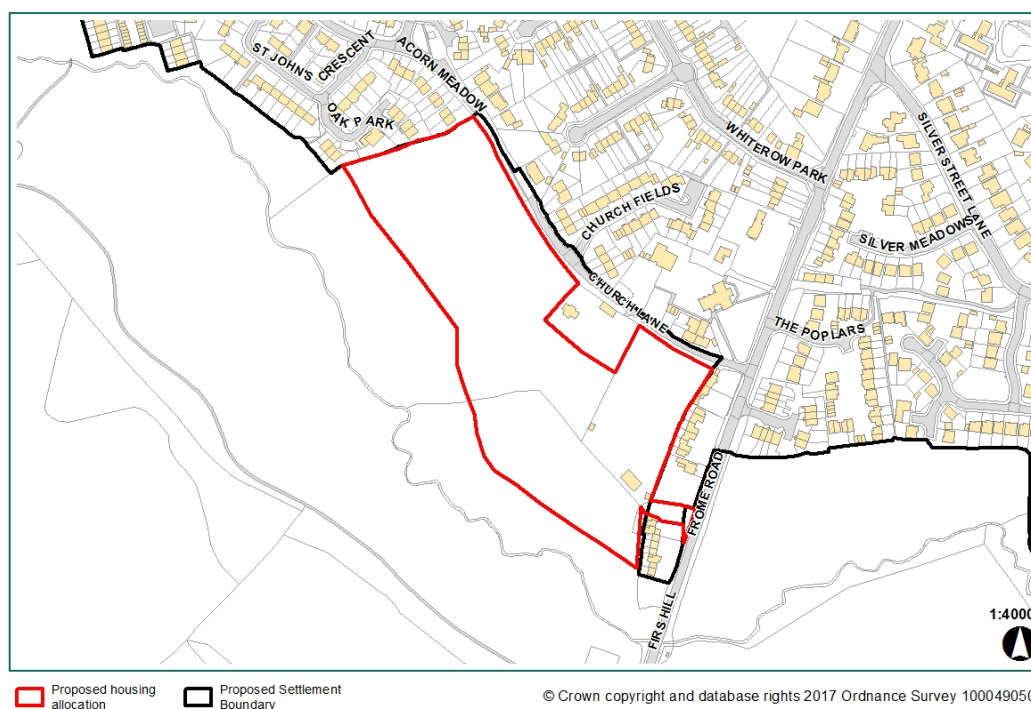




- 5.58 Approximately 16.33ha of land to the South West of Elizabeth Way is allocated for the development of approximately 205 dwellings, as identified on the Policies Map. The site extends over a significant area of agricultural land quite markedly enclosed by existing development and Elizabeth Way distributor road. The character of the land within the site is relatively open and offers views through the existing urban edge of the town and eastwards to the village of Hilperton. The dominant feature in the landscape is Elizabeth Way which would serve as access to the site.
- 5.59 Mature and semi-mature hedgerows and trees are also a key feature in the landscape and provide habitat for protected and non-protected species. The existing natural features of the site are significant in the landscape and would be incorporated within the detailed layout. These features also provide wildlife corridors that link habitat features within the local area; in particular, 'dark corridors' for foraging bats. These elements should be protected and enhanced where possible by additional planting with native species.
- 5.60 An important measure will be the provision of landscaping between Elizabeth Way and new housing in order to attenuate noise and reduce the visual impact of this road.
- 5.61 There are opportunities to provide new routes for walking and cycling that would also serve the existing built-up area and that could improve connectivity for a wider area of the town. These should be explored and, wherever practicable, provided in order to encourage a reduction in private car journeys.

- 5.62 In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town.

#### H2.4 Church Lane



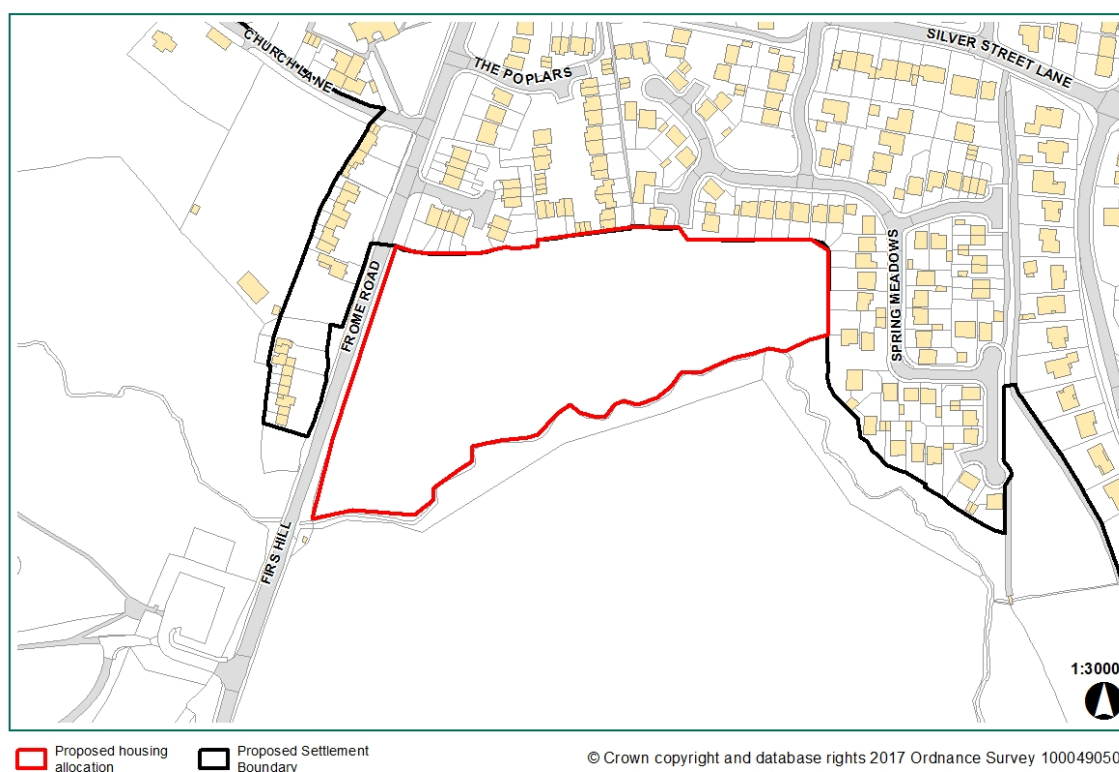
- 5.63 Approximately 3.72ha of land at Church Lane is allocated for the development of approximately 45 dwellings, as identified on the Policies Map. The site lies on the edge of existing built form and the Southwick Country Park. It is an open site that slopes to the south-west towards the Lambrok Stream.
- 5.64 Development proposals would need to ensure that the significance and setting of the Grade II Listed St John's Church would be appropriately protected. To achieve this objective, access to the site would need to be secured via a new junction arrangement off the A361, rather than improvements to Church Lane.
- 5.65 Proposals would need to provide a design and layout that enhances the urban edge of the town. Existing hedgerows and trees would need to be retained and enhanced through new landscaping features along the line of the Lambrok Stream. Such features would need to be of sufficient scale to protect and enhance the character and amenity provided by Southwick Country Park. Links between the site, the Country Park and existing built form would be achieved through improvements to footpath TROW8.
- 5.66 The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site include:

- Framfield
- Boundary hedgerows
- Lambrok Stream

5.67 These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. Development will be required to contribute towards the delivery of the Trowbridge Mitigation Strategy.

5.68 In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town.

### H2.5 Upper Studley



5.69 Approximately 2.33ha of land at Upper Studley is allocated for the development of approximately 20 dwellings, as identified on the Policies Map. The site has a physical relationship to the Lambrok Stream and recently built developments at Silver and Spring Meadows. The land slopes towards the stream and is bound to the south by tall, mature poplar trees.

5.70 An objective of detailed design and layout will be to provide an attractive frontage to Firs Hill and enhance this approach to the town. The existing



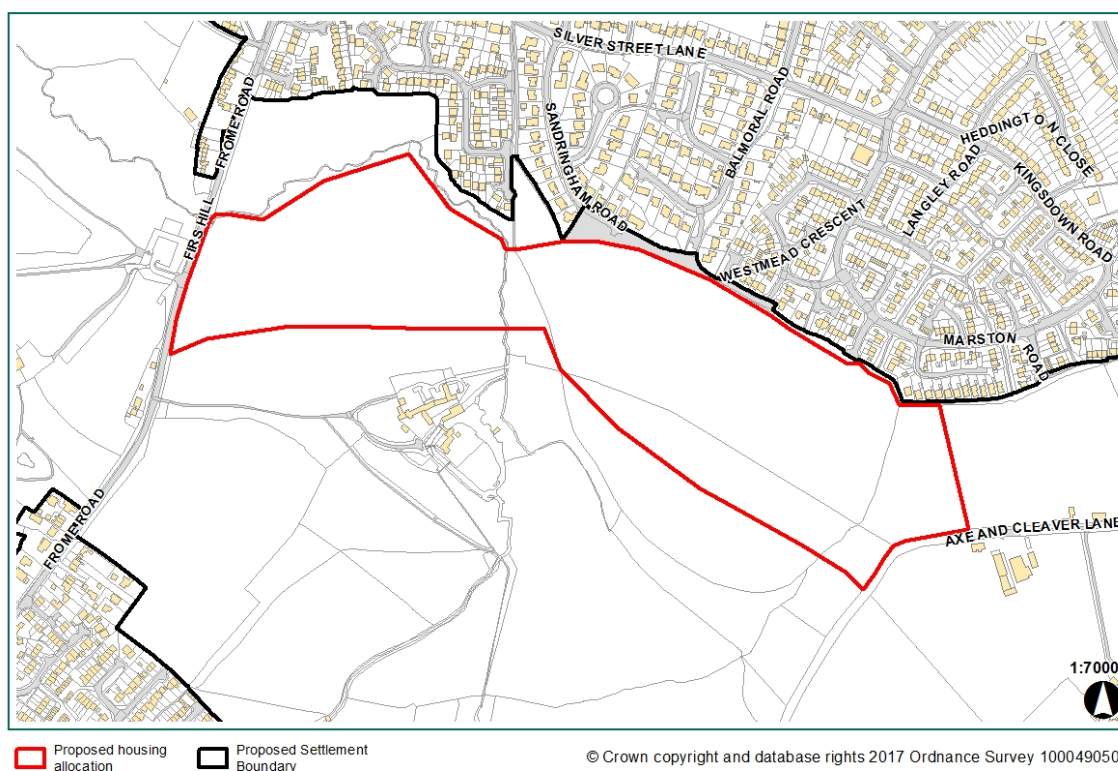
natural features of the site are significant in the landscape and would be incorporated within a detailed layout and Lambrok Stream should be enhanced as a local amenity feature of the site in conjunction with development proposed at Southwick Court.

5.71 The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site include:

- Boundary hedgerows / tree lines
- Lambrok Stream

5.72 These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. Development will be required to contribute towards the delivery of the Trowbridge Mitigation Strategy.

### H2.6 Southwick Court



5.73 Approximately 18.17ha of land at Southwick Court is allocated for the development of approximately 180 dwellings, as identified on the Policies Map. The site extends over a significant area of agricultural land. The character of the land is relatively open and offers views to the north towards

the existing urban edge of the town and south over land that forms a natural buffer to maintain the separate identity of the village of Southwick.

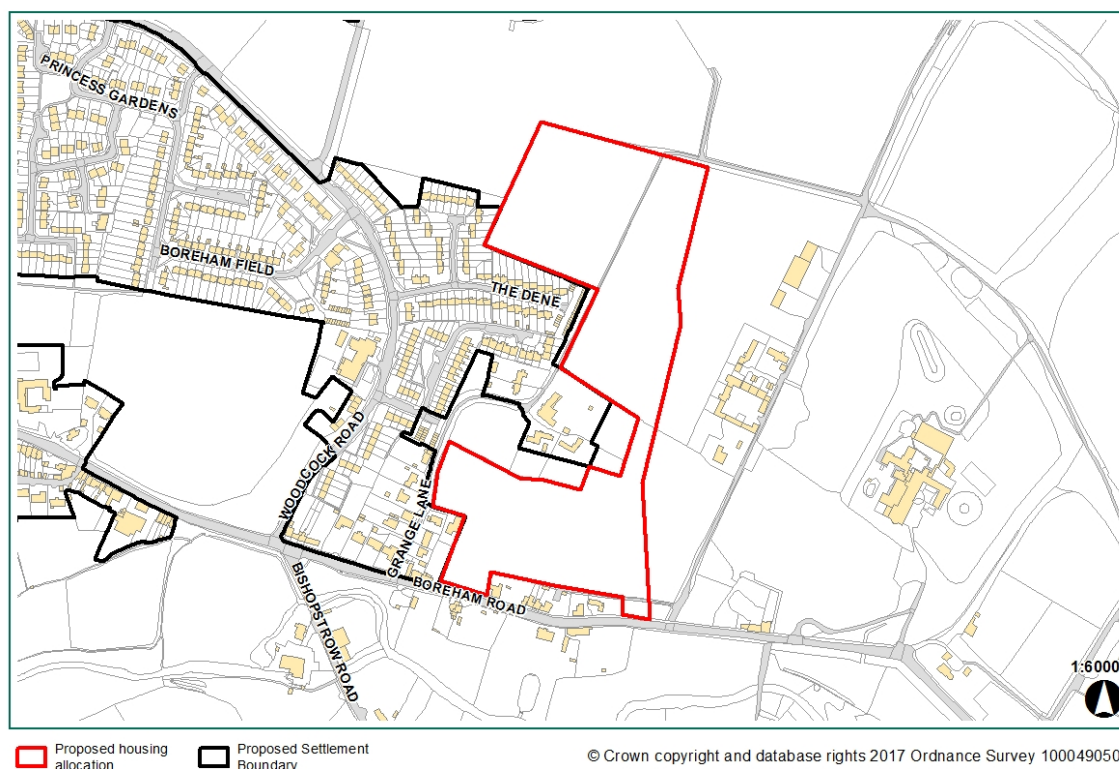
- 5.74 The area is of historic significance as water meadows associated with the Grade II\* Listed Southwick Court Farmstead. An essential objective of detailed design will be to minimise harm to its significance. The setting to this heritage asset will be preserved, to the greatest extent possible, informed by the results of more detailed Heritage Impact Assessment. Taking account of the weight attached to the significance of the asset any residual harm requires a clear and convincing justification and should not be substantial. The social and economic advantages of the development, including the provision of additional homes, achieve substantial public benefits. A comprehensive development scheme will need to ensure that new homes are directed to the east of the Lambrok Stream. Land to the west may become either formal or informal open space or remain in agricultural use, but will not be developed for new homes. The character of the area will therefore help to retain the high significance of this heritage asset.
- 5.75 Landscaping will be an important element of any subsequent scheme. The site represents an expansion of the town into the countryside. Development would therefore replace a substantial length of the town's existing urban edge. To address the impact of change in the landscape a comprehensive landscape treatment would provide an opportunity to improve the impact of the town on the wider landscape and in so doing protect and enhance the Southwick Court Farmstead. The Lambrok Stream and its respective flood plain should be enhanced as a local amenity feature of the site in conjunction with development proposed at Upper Studley above.
- 5.76 Mature hedgerows and trees (including a solitary veteran Oak tree) are a key feature in the landscape and provide habitat for protected and non-protected species. The existing natural features of the site are significant in the landscape and would be incorporated within a detailed layout. These features also provide wildlife corridors that link habitat features within the local area; in particular, 'dark corridors' for foraging bats. These elements should be protected and enhanced where possible by additional planting with native species.
- 5.77 The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site include:
- Boundary hedgerows
  - Axe and Cleaver Lane
  - Lambrok Stream
  - Moat and grounds at Southwick Court

- 5.78 These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. Development will be required to contribute towards the delivery of the Trowbridge Mitigation Strategy.
- 5.79 Opportunities to improve walking and cycling routes through the existing built framework should be explored and, wherever practicable, new and improved routes provided in order to encourage a reduction in private car journeys and, in particular, to promote access to the wider countryside.
- 5.80 In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town.

### **Warminster**

- 5.81 Warminster is a Market Town and has the potential to accommodate significant levels of development. As anticipated by the settlement strategy, an increase in jobs and homes in the town would help to enhance services and facilities and promote better levels of self-containment. The WCS envisages Warminster accommodating approximately 1,920 additional dwellings over the plan period (2206 to 2026).
- 5.82 Surface water management at Warminster is a particular issue. Developments will be supported by comprehensive Drainage Strategies that ensure the development will result in improved drainage conditions. Sufficient land will also need to be set aside for surface water management measures.

H2.7 East of the Dene, Warminster



- 5.83 Approximately 6.84ha of land east of The Dene, as shown on the Policies Map, is allocated for the development of approximately 100 dwellings. The land is in agricultural use. Land adjoining residential development at The Dene is suited to accommodate development in terms of visual impacts in the wider countryside.
- 5.84 The main access will be from Boreham Road but the south west part of the site is considered to be unsuited to built development because of its sensitivity in heritage and landscape terms. This land may remain in agricultural use or becomes either formal or informal open space, but will be undeveloped so the character of the area continues to preserve the significance of heritage assets.
- 5.85 The design of an access point should also minimise the loss of high wall that is a characteristic of this approach to the town. Secondary access, in particular for cycling and walking, should also be sought through The Dene and improvements should be made to footpath WARM40.
- 5.86 The site has a number of heritage and related landscape considerations. A sensitively designed scheme should be brought forward which has been informed by a Heritage Impact Assessment and appropriately responds to the character and location of the site and respects the significance of the following heritage assets:

- Listed Buildings in the vicinity of the site, including Bishopstrow House
- Bishopstrow Conservation Area
- Views from Battlesbury Camp hillfort

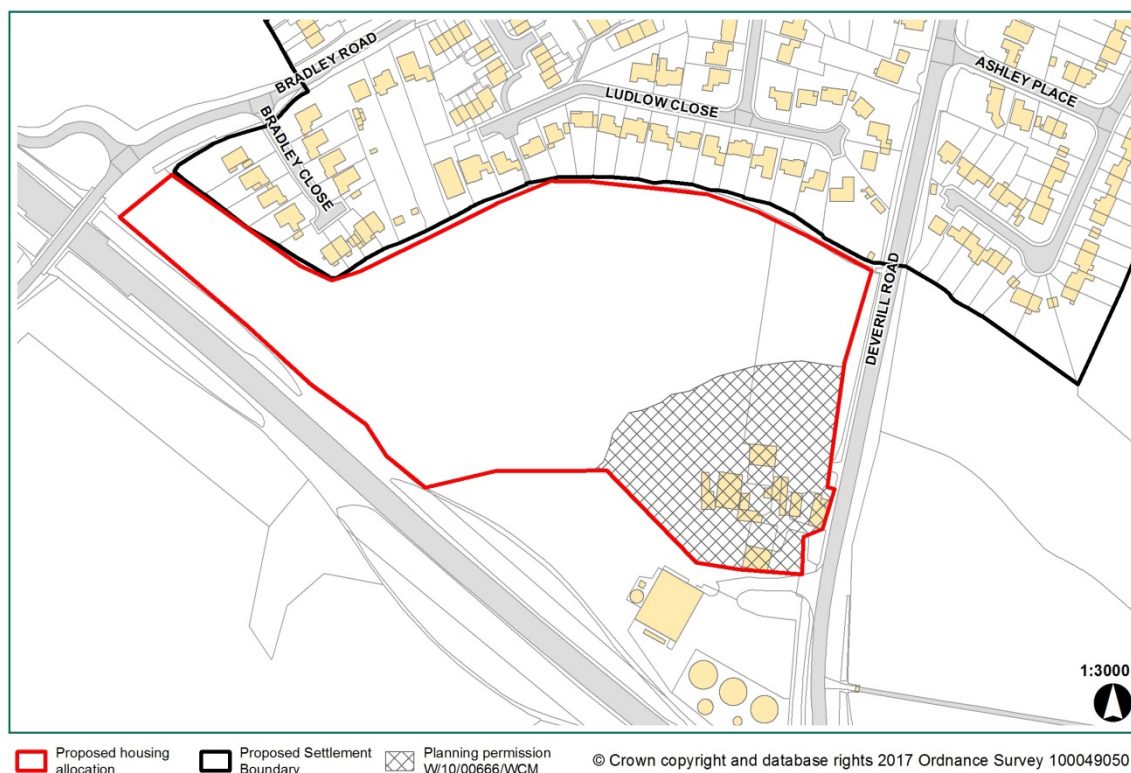
5.87 In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries at the town.

**Policy H2.7 Land east of The Dene, as identified on the policies map, is proposed for development comprising**

- **approximately 100 dwellings**
- **2ha of land undeveloped land to be located in the south west part of the site**

**Development will take place in accordance with a masterplan for the site approved by the Council as part of the planning application process.**

### *H2.8 Bore Hill Farm, Warminster*



5.88 Approximately 4.47ha of land at Bore Hill Farm/Bradley Road, as shown on the Policies Map, is allocated for the development of approximately 70 dwellings.

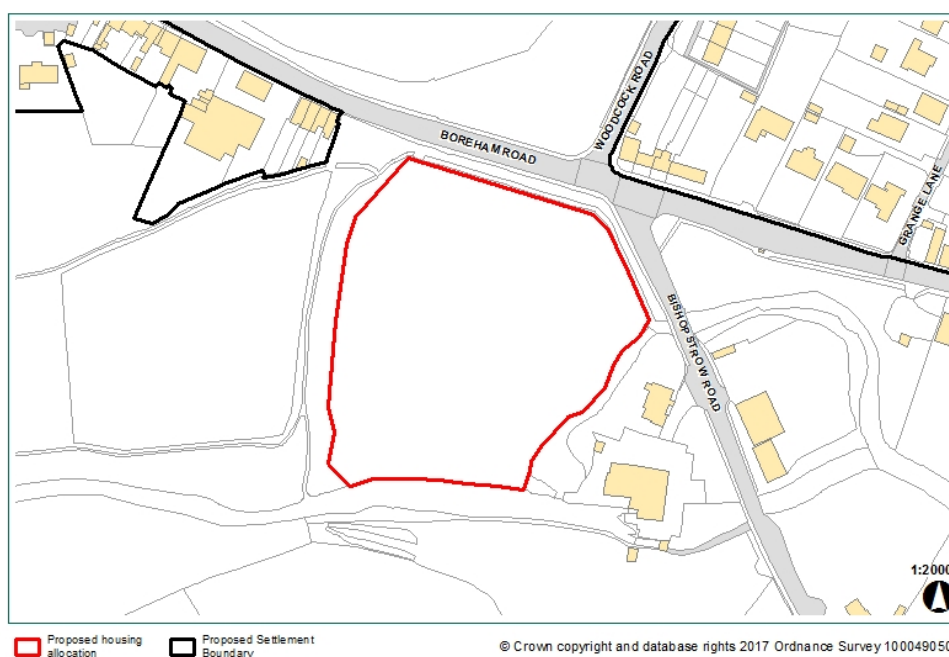


- 5.89 The site is formed of land between the A36 and Deverill Road which lies adjacent to the Bore Hill Farm bio-digester. There is some limited screening on the north boundary with existing development at Bradley Close and Ludlow Close. Additional landscape screening at the site boundaries would be required to preserve and maintain the living conditions of adjoining residential dwellings. Vehicular access will be provided from Deverill Road, and connection to and improvement of public right of way WARM60 should be provided.
- 5.90 The site area includes land at Bore Hill Farm which benefits from extant planning permission for the development of B1 employment units<sup>16</sup>. In order to retain the employment generating use of this part of the site, in line with Warminster Neighbourhood Plan Policy W1, development would include approximately 70 dwellings together with B1 employment use. Provision for employment use as part of the development will take the form of land, equivalent in extent to that part of the current planning permission within the allocation, being reserved and marketed as serviced land. It would be located between the operational bio-digester and proposed residential development, to provide separation between these uses. A noise assessment would form part of the planning application process and to inform detailed design and layout.
- 5.91 Future development of the site shall be brought forward in such a way that ensures the residential and employment uses on the site are compatible. In line with WCS Core Policy 41, opportunities should be explored for new development to use energy generated by the adjoining biodigester. In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries at the town.

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<sup>16</sup> W/10/00666/WCM Bore Hill Farm

### H2.9 Boreham Road



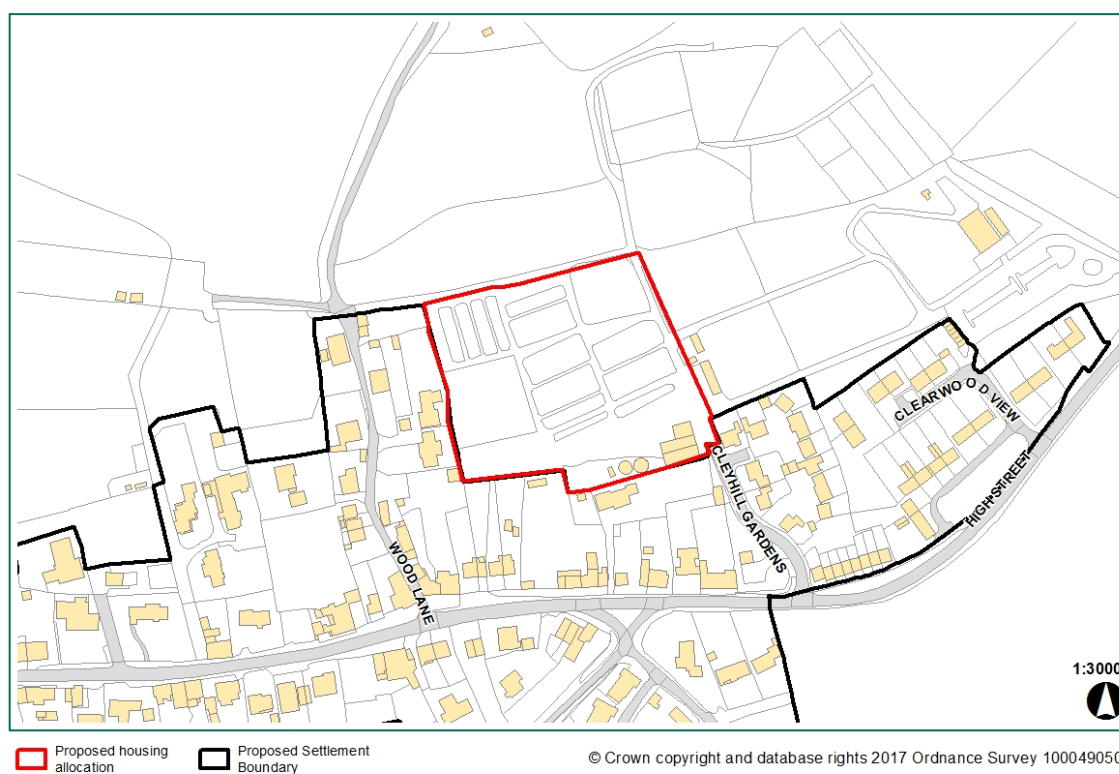
- 5.92 Approximately 1.32ha of land at Boreham Road, as shown on the Policies Map, is allocated for the development of approximately 30 dwellings. It has previously been considered as an opportunity to provide for self build homes and this remains the preferred form of development.
- 5.93 The site comprises relatively low grade agricultural meadow land that, in part, has been used for the disposal of builders' rubble and spoil. It is well contained and framed by existing mature hedgerows and trees. These features provide important habitat corridors and should therefore be retained, protected and, where possible, enhanced through additional planting.
- 5.94 Whilst situated outside the Bishopstrow Conservation Area, the site is considered to lie within the setting of this designated heritage asset. Development of the site would therefore need to respond positively to its surroundings and have due regard to the special character or appearance of the Conservation Area. A Heritage Impact Assessment would be required in order to support and inform any subsequent proposals, including the design of mitigation measures. The setting of heritage assets will be protected so as to ensure, as far as practicable, there will be no substantial harm to their significance.
- 5.95 Development of the site would need to be supported and informed by a Drainage Strategy and water infrastructure capacity assessment. Where necessary, details relating to the reinforcement of existing foul/storm water drainage arrangements would need to be submitted with any subsequent

planning application. Drainage measures for the attenuation and management of surface water would need to be capable of achieving greenfield, or better, infiltration rates.

- 5.96 Vehicular access would be achieved from Boreham Road. Details relating to the provision of the junction arrangement; relocation of the Grade II Listed milestone marker; culvert arrangements; closure of existing agricultural field gate and reconstruction of pedestrian footways onto Boreham Road would need to be submitted with any planning application. In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries at the town.

### Warminster Community Area Remainder

#### H2.10 Barbers Farm, Chapmanslade



- 5.97 Chapmanslade is designated as a Large Village where an appropriate level of development is anticipated in order to meet housing needs and improve employment opportunities, services and facilities. Development will provide affordable homes and improved cycling and walking routes to the heart of the village, thereby contributing towards the delivery of the Warminster Community Area Strategy, as anticipated by the WCS.

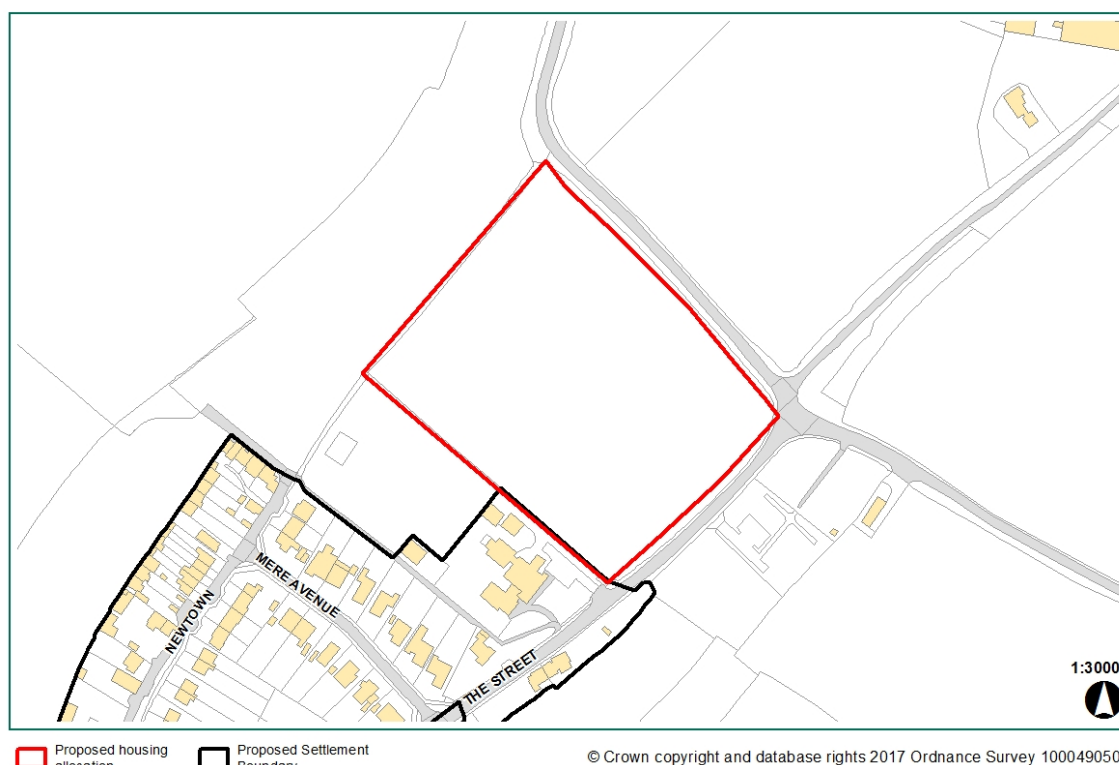
- 5.98 Approximately 1.35ha of Land at Barbers Farm is allocated for the development of approximately 35 dwellings, as identified on the Policies Map.



As a former nursery and garden centre, development does not result in the loss of agricultural land and open countryside. Within the context of the village, the site is well located and avoids adversely impacting on ecological features such as Ancient Woodland that lies on the periphery of much of the settlement.

## Chippenham Community Area Remainder

### H2.11 The Street, Hullavington



**Policy H2.11 Land at the Street, Hullavington, as identified on the policies map, is proposed for development comprising:**

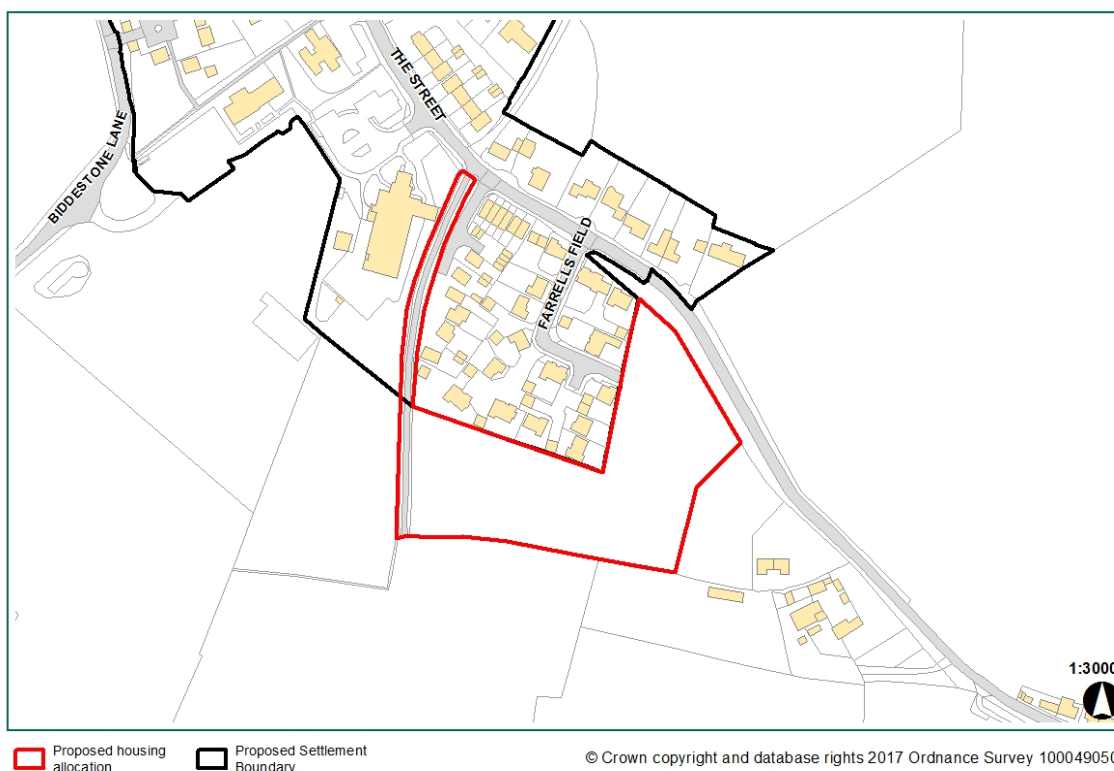
- approximately 50 dwellings.
- 0.2 ha land for primary school expansion

**Development will take place in accordance with a masterplan for the site approved by the Council as part of the planning application process.**

5.99 Hullavington is designated as a Large Village where development is limited to meet local needs. The local primary school is now at capacity. This is a potential barrier to any planned housing development and a situation with the prospect of indefinite strains on local infrastructure. It would also constrain the long term prospects of the village and undermine its role in the spatial strategy. This site provides an appropriate solution to meet local need in accordance with the WCS.

- 5.100 Approximately 2.44ha of land adjacent to the Primary School is allocated for the development of approximately 50 dwellings and 0.25ha to allow for the expansion of the primary school, as shown on the Policies Map. The site is in agricultural use and adjoins the village primary school. The scheme will provide land to expand the school to meet future local needs as well as being necessary to serve pupils from the development itself. In addition to the land provided, funding contributions will also be sought to help secure construction.
- 5.101 Access would be from The Street / Norton Road and would require highway improvement works to the existing junction layout and visibility splays associated with The Street / Norton Road junction. This may include significant alteration/relocation of the existing junction and speed limit adjustments.
- 5.102 A sufficient buffer should be provided to the watercourse to the north of the site to safeguard the function of the tributary to the River Gauze. It also provides options to deliver public open space and biodiversity enhancement. Mature hedgerows and trees would be retained and planting Barberry will enhance habitat for the Barberry Carpet moth, a priority species of the Biodiversity Action Plan. Development would need to retain the historic footpath through the site to the surrounding countryside, HULL29 should be improved and HULL1 and HULL33 should be retained.

*H2.12 East of Farrells Field, Yatton Keynell*



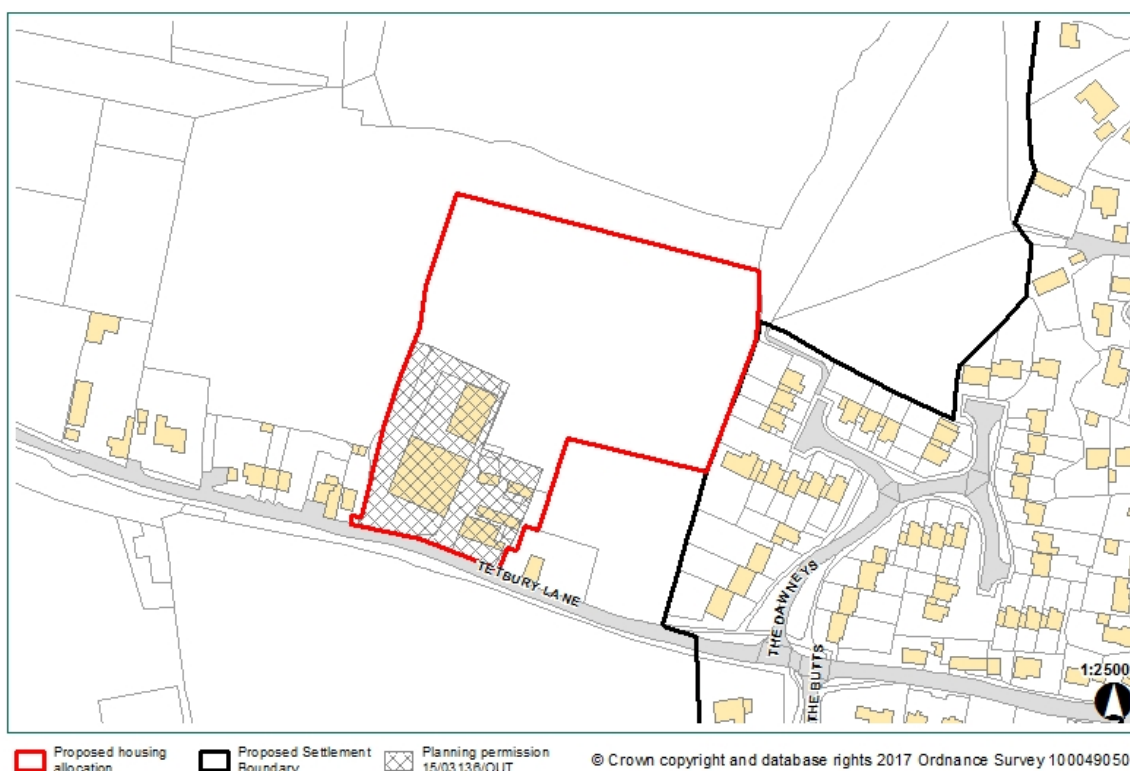
5.103 Yatton Keynell is designated as a Large Village where development is limited to meet local needs. Much of the land around the settlement is within an Area of Outstanding Natural Beauty and development at the village is constrained by the importance of the need to conserve the qualities of the designation. An allocation of land that avoids the designation provides for local needs and supports the role of the settlement.

5.104 Land East of Farrells Field, Yatton Keynell is allocated for the development of approximately 30 dwellings on approximately 1.3ha of land, as shown on the Policies Map. It is well located with regard to local services and facilities. The site is in agricultural use and represents the continuation of recent development in this part of the settlement.

5.105 A woodland corridor along the western boundary should be retained as a wildlife corridor. Retention of the existing boundary vegetation on site would provide screening to reduce the effect on adjacent visual receptors and be in keeping with the existing landscape character. Access would be taken from Farrell Fields and the possibility to link to adjacent footpaths should be explored.

## Malmesbury Community Area Remainder

### H2.13 Ridgeway Farm, Crudwell



5.106 Crudwell is a designated as a Large Village where development is limited to meet local needs. It has the lowest rate of growth of all the Large Villages in the community area and there is an identified local need for housing. Part of the proposed allocation benefits from an unimplemented planning permission for development<sup>17</sup>. Development of this site for approximately 40 additional dwellings would expand the village by a relatively significant extent, but would deliver substantial benefits, including the capacity to provide a number of affordable homes.

5.107 Approximately 1.7ha of land at Ridgeway Farm, Crudwell is allocated for the development of approximately 50 dwellings as shown on the Policies Map. It is in a location that has the capacity to accommodate change from an environmental and landscape perspective. It would provide wider benefits for the local community by scope to provide for affordable housing and by supporting the expansion of the local primary school. The school is currently full but expansion could be possible through funding contributions toward additional capacity to cater for pupils arising from development. This would remove a particular constraint to the long term prospects of the village and support its role in the spatial strategy. .

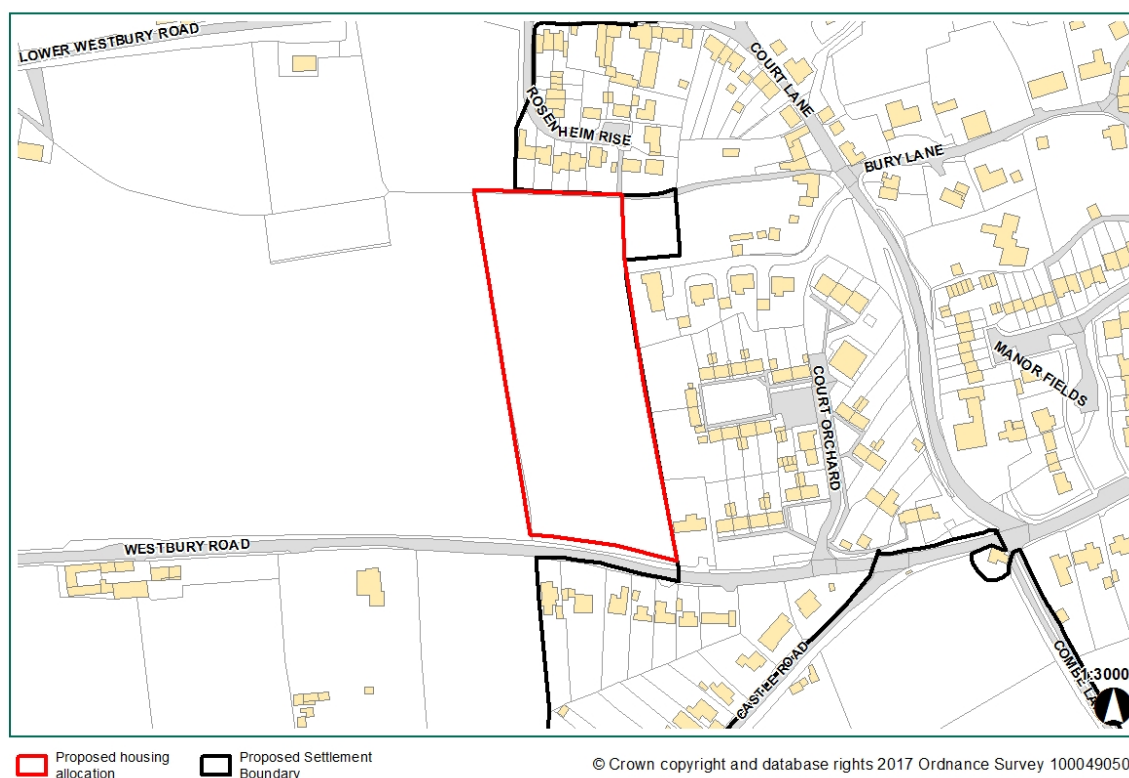
<sup>17</sup> 15/03136/OUT, Ridgeway Farm, Tetbury Lane

5.108 The site forms part of a larger field encompassing the old farm buildings. There are no field boundaries on the site's western boundary therefore a new visual boundary will need to be established. Additional screening at the site boundaries would be required to preserve and maintain the landscape's quality, particularly on the northern and eastern boundaries. This would retain views of a wooded framework in longer distance views and minimise the visibility of the development in the wider landscape. Development along Tetbury Lane should be sensitively designed to ensure it integrates with the existing semi-rural frontage and supports the distinctiveness of the village.

5.109 Access will be from Tetbury Lane and will require highway improvement works to the junction of Tetbury Lane/ A429 and improvements for pedestrians along Tetbury Lane and, elsewhere where feasible, in order to improve accessibility to the centre of the village. An extension of public footpath CRUD9 would be required, to the west of the Dawneys, linking with Tetbury Lane to allow for wider improvements to be delivered in relation to the local public rights of way network.

## Westbury Community Area Remainder

### *H2.14 Court Orchard/Cassways, Bratton*



5.110 Bratton is designated as a Large Village where some development is acceptable to meet housing needs and to improve employment opportunities, services and facilities.

- 5.111 Approximately 1.35ha of land at Court Orchard/Cassways is allocated for the development of approximately 40 dwellings, as identified on the Policies Map.
- 5.112 The site comprises a roughly rectangular field that slopes down towards the north. The site is situated on the edge of Bratton, and is within a Special Landscape Area. A part of the site also adjoins the Bratton Conservation Area.
- 5.113 Trees and hedgerows on the sites boundaries are important wildlife corridors and have ecological importance. Consequently they should be retained, protected and where necessary, enhanced through additional planting.
- 5.114 Additional screening at the site boundaries would be required to preserve and maintain the landscape quality, Conservation Area and edge of settlement setting, and to protect the amenity of adjoining residential dwellings. A new visual boundary to the settlement will need to be established along the site's western edge and new woodland planting will be a substantial part of a scheme.
- 5.115 Part of the site is susceptible to surface water flooding and a flood risk assessment will have to pay particular regard to this and inform the design of the site.
- 5.116 Access would be from the B3098. Improved connections to adjoining public rights of way BRAT24 and BRAT25 should be facilitated through any subsequent development proposals.

## **South Wiltshire Housing Market Area**

- 5.117 Land for housing development is identified to ensure supply, support the role of settlements in the South Wiltshire HMA, and improve choice and competition in the market for land. Evidence suggests a need for a greater intervention by the Plan with regard to the South Wiltshire HMA in order to ensure a continuity of land supply<sup>18</sup>.
- 5.118 As a Principal Settlement, the WCS anticipates that Salisbury will be a primary focus for development. Moreover, the role of the city as a significant employment and strategic service centre will be expected to be strengthened over the Plan period up to 2026. Additional allocations are therefore made to support this role.
- 5.119 Other allocations are made at Durrington, a Market Town with Amesbury and Bulford, to supports its role.

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<sup>18</sup> Topic Paper 3: Housing Land Supply, paragraph 3.26, Wiltshire Council (July 2017)

**Policy H3 Land is allocated for residential development at the following sites, as shown on the policies map:**

**South Wiltshire Housing Market Area**

Community Area	Reference	Site Name	No of dwellings
<b>Salisbury</b>	H3.1	Netherhampton Road, Salisbury	640
	H3.2	Hilltop Way	10
	H3.3	North of Netherhampton Road	100
	H3.4	Land at Rowbarrow	100
<b>Amesbury</b>	H3.5	Clover Lane, Durrington	45
	H3.6	Larkhill Road, Durrington	15

5.120 How these sites were selected is explained in Community Area Topic Papers.

5.121 The specific requirements and form development will take are described below for each site to ensure they are each appropriate in scale and character to their location and in accordance with WCS and national policy.

**Salisbury**

5.122 Salisbury is designated as a Principal Settlement in the Wiltshire Core Strategy and is a strategically important centre and a primary focus for development. Significant levels of jobs and homes should be provided in Principal Settlements, together with supporting community facilities and infrastructure, to meet their economic potential and to support self-containment (Core Policy 1). The WCS envisages Salisbury, with Wilton, accommodating approximately 6,060 dwellings over the plan period (2006 to 2026).

5.123 Assessment evidence demonstrates three considerations to be addressed in order for housing development to be accommodated:

**Transport:** development inevitably has impacts on the local transport network. The Salisbury Transport Strategy contains measures to support the scale of growth envisaged by the WCS. Plan allocations crystallise the pattern growth takes up to 2026 and refreshing the Salisbury Transport Strategy will allow the effectiveness of existing measures to be reviewed and propose new ones to accommodate growth. Development will contribute to these wider network measures, where necessary, alongside measures that are implemented expressly as part of specific development proposals.

**Education:** development will increase the number of pupils needing primary school places. A lack of capacity across the City affects proposals allocated for development. The evidence points to the need for a new primary school. Therefore, in addition to land reserved for one new school, funding

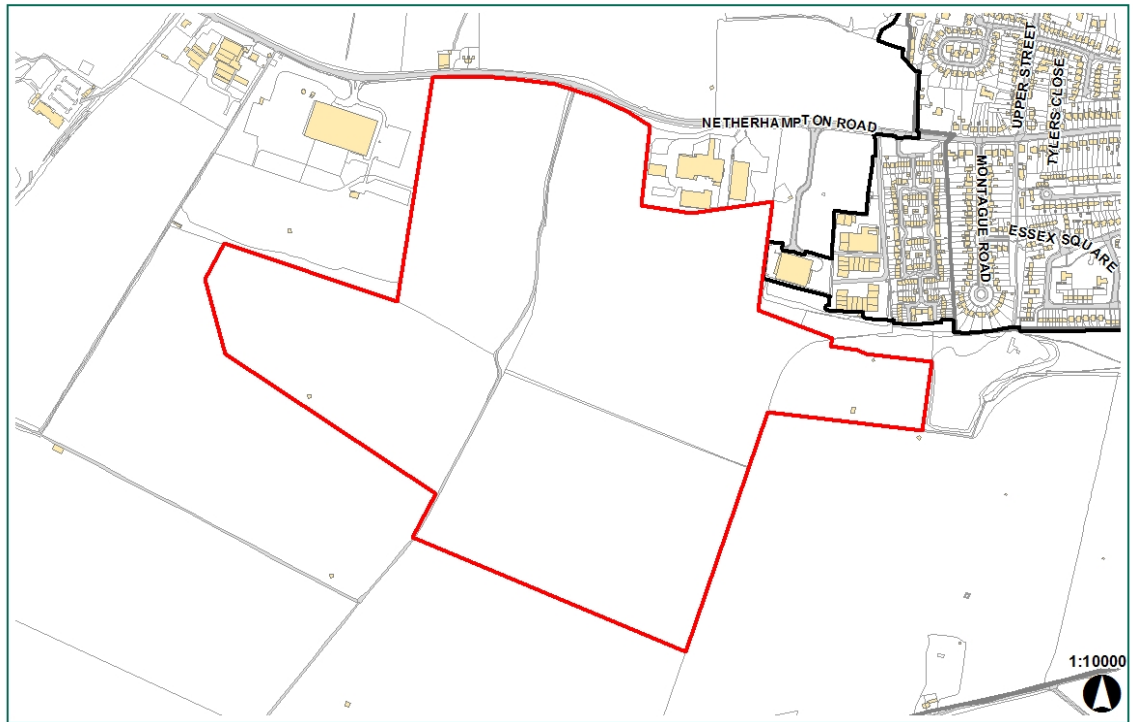


contributions will be sought from developers to help provide adequate capacity.

**Biodiversity:** development could contribute cumulatively towards adverse impacts on the qualifying features of the River Avon SAC through increased phosphate loading and habitat loss / damage. However, the scale of development is within thresholds set down in a Nutrient Management Plan for the river that avoids the likelihood of adverse effects. Nevertheless, impacts are kept under review and this situation may change. Housing developers might consider how schemes can offset the additional phosphate loading resulting from new homes.



### H3.1 Netherhampton Road, Salisbury



 Proposed housing allocation  
 Proposed Settlement Boundary

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**Policy H3.1 Approximately 63ha of land at Netherhampton Road, as identified on the policies map, is proposed for mixed use development comprising the following elements:**

- **approximately 640 dwellings**
- **Land for employment (B1, B2 and B8 uses of the Use Classes Order)**
- **at least 1.8ha of land for a two form entry primary school along with playing pitches**
- **A local centre**
- **A Country Park of at least 10ha in size with associated parking and facilities.**

**Development will be subject to the following requirements:**

- **Strategic landscaping and open space provision. All built development to be located below the 75m contour and a Country Park to be located in the east and south of the site.**
- **Transport network improvements necessary to accommodate the scale of development envisaged**
- **Provision of sufficient school and healthcare capacity to meet the need created by the development**
- **Measures to safeguard the interest of Harnham Hill Chalk Pit SSSI and Harnham Slope County Wildlife Site**
- **Surface water management that achieves equivalent or less than current greenfield rates of run-off**

**Development will take place in accordance with a masterplan for the site approved by the Council**

5.124 Approximately 63ha of land to the south of Netherhampton Road, as shown on the Policies Map, is allocated for development of approximately 640 dwellings, employment land and a new two form of entry primary school and a local centre. All built development will be below the 70m contour and a scheme will include a country park and extensive planting. Development of this site represents necessary growth to support the delivery of housing at Salisbury and thereby maintain a 5 year housing land supply position within the South Wiltshire Housing Market Area.

5.125 The site was originally included in the draft South Wiltshire Core Strategy as a strategic allocation. Whilst the Examination of that plan led to the site not being allocated for development due to a reduction in housing requirements, it was nonetheless considered suitable as a strategic allocation and referenced as a potential site for consideration if, or when the need for additional housing

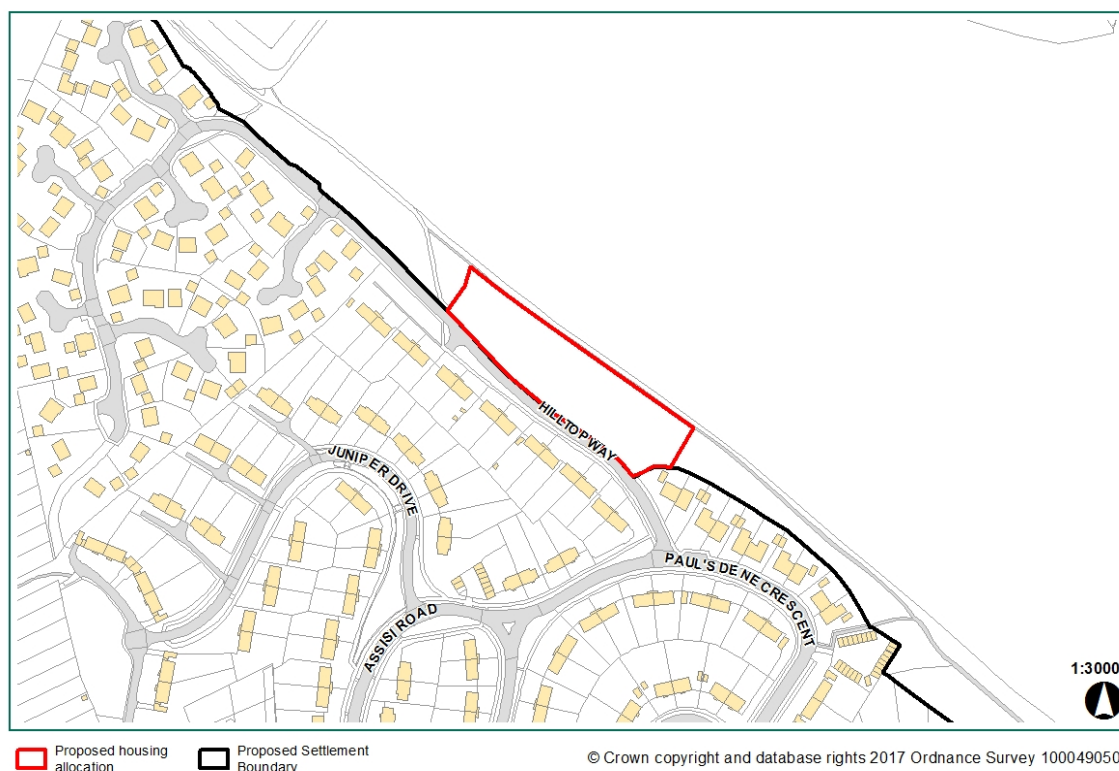
arises. Accordingly, the site is referenced in paragraph 5.112 of the Wiltshire Core Strategy as a site that should be considered if further land is needed to meet housing requirements, and the site has now been confirmed as a preferred location for growth having been assessed through a sustainability appraisal which assessed a number of reasonable alternative sites around Salisbury.

- 5.126 In order to facilitate development, there is a requirement for a new primary school to be provided on site. Accordingly, a minimum of 1.8ha of land is reserved within the scheme in order to accommodate a two form entry primary school.
- 5.127 The site will include an element of employment alongside other uses. Evidence does not suggest a specific quantum of employment land. The site has a strategic role as a possible destination for the relocation of businesses to allow the redevelopment of the Churchfields strategic allocation of the WCS. A scale and form of employment would be a matter for discussion with relevant stakeholders as a part of preparing a master plan for the site but would be delivered in the form of serviced land.
- 5.128 This location has capacity to accommodate change from an environmental and landscape perspective. There are no landscape, biodiversity or heritage designations within the site. The edge of the Cranborne Chase and West Wiltshire Downs AONB lies approximately 2km south-west of this site and no significant impacts on the AONB are considered likely. Mitigation is considered achievable to reduce any potential adverse landscape effects, including on visual connections to local landmark features e.g. Salisbury Cathedral, Old Sarum and Netherhampton Church, through significant provision of appropriately located public open space and green infrastructure, with new residential development located in the northern part of the site and restricted to below the 75m contour line. Substantial new tree planting will reflect typical Downland characteristics.
- 5.129 The site includes prehistoric barrows, field systems and enclosures and very high archaeological potential. However, the site is large and the exact extent of work is uncertain. Investigations should inform a master plan for the site and an archaeological assessment would be required to support a subsequent planning application.
- 5.130 West Harnham Chalk Pit Site of Special Scientific Interest (SSSI) and Harnham Slope County Wildlife Site (CWS) should be protected. Potential additional recreational use will be positively managed. Sufficient areas of public open space should be incorporated into a layout and design in order to protect these sites by providing attractive, alternative areas for recreation. To support this objective, a significant sized Country Park in the south and east of the site for recreational use by the public as part of open space and green infrastructure provision. Additional planting will go some way to counteract

the phosphate loading and resulting pressures on the River Avon SAC that development will create. An objective of the site will be to offset fully all potential for harm.

- 5.131 Comprehensive improvements to the local and strategic road network would be necessary to safely accommodate development where the residual cumulative impacts are severe. Accordingly, contributions towards these improvements will likely be sought. To address such matters, dialogue with Highways England will be required and work would take place in conjunction with a refresh of the Salisbury Transport Strategy. Mitigation measures will be guided by evidence from a robust and comprehensive transport assessment which will need to be undertaken by any future applicant, the scope of which is to be agreed by Wiltshire Council and Highways England. The assessment would fully investigate detailed transport impacts of the development on the wider Salisbury transport network, especially on the A36T, and identify appropriate measures to safely accommodate additional traffic emanating from the new development.
- 5.132 In addition, measures to positively promote and support cycling, walking and public transport use would also need to be addressed through any subsequent planning application process. This too would be undertaken in conjunction with an updated Salisbury Transport Strategy that takes account of planned strategic growth of Salisbury. The site is reasonably well located in relation to the city centre and development should include measures to enable as many trips as possible to the city centre to take place on foot, cycling or by public transport. The bridleway leading from the site (NHAM10) is likely to be a key route for people walking and cycling from the site connecting to the Old Shaftesbury Drove and into Harnham. Development of the site should include suitable surfacing of this route throughout the site.
- 5.133 A water infrastructure capacity appraisal will be needed to confirm the scope and extent of works to service new development. This should include the capacity of local sewer systems. A detailed flood risk assessment would be required in order to identify a set of appropriate sustainable drainage measures. Sufficient land would need to be set aside for robust surface water management, to include a comprehensive Surface Water Drainage Scheme that results in run-off rates equalling, or greater than current greenfield infiltration rates.

### H3.2 Hilltop Way, Salisbury



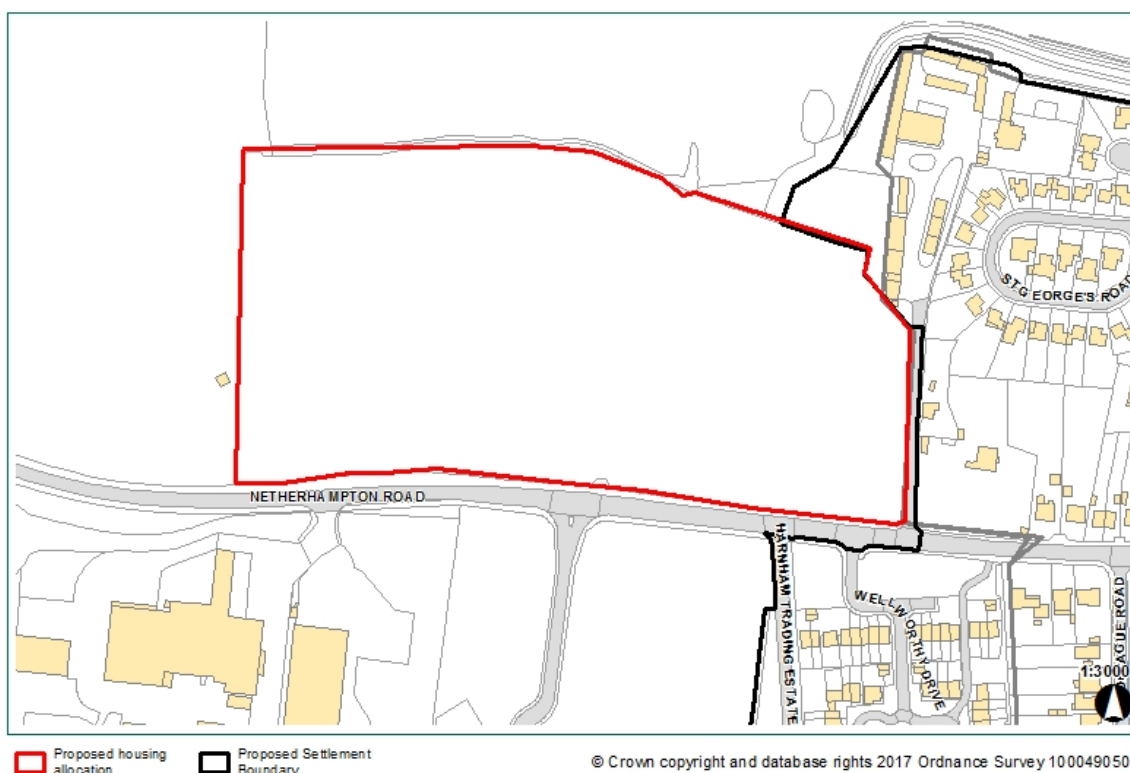
5.134 Hilltop Way is allocated for the development of approximately 10 dwellings on approximately 0.48ha of land as shown on the Policies Map. The site is adjacent to the existing settlement boundary of Salisbury and would deliver a relatively small number of dwellings towards the overall remaining indicative housing requirement for Salisbury.

5.135 The site is a narrow area of undeveloped rough grassland adjacent to existing residential development along Hilltop Way. Access to the site would be achieved via Hilltop Way. There is a public right of way forming the northern boundary of the site and beyond that is the Hampton Country Park. The right of way should be maintained and its route enhanced through additional hedge and tree planting and additional access points to the Country Park.

5.136 The site has been shown to have a high population of reptiles (Slow Worms) and these will need to be re-colonised on a suitable receptor site within the Country Park. It will be important to demonstrate that the mitigation proposals are consistent with Laverstock and Ford Parish Council's wider aims for the Country Park.

5.137 There is potential for impacts on skyline views from Old Sarum Airfield Conservation Area and from Old Sarum Castle and these will need to be mitigated through the appropriate location of new dwellings and a high quality design scheme, together with suitable landscaping and provision of open space.

### H3.3 North of Netherhampton Road, Salisbury



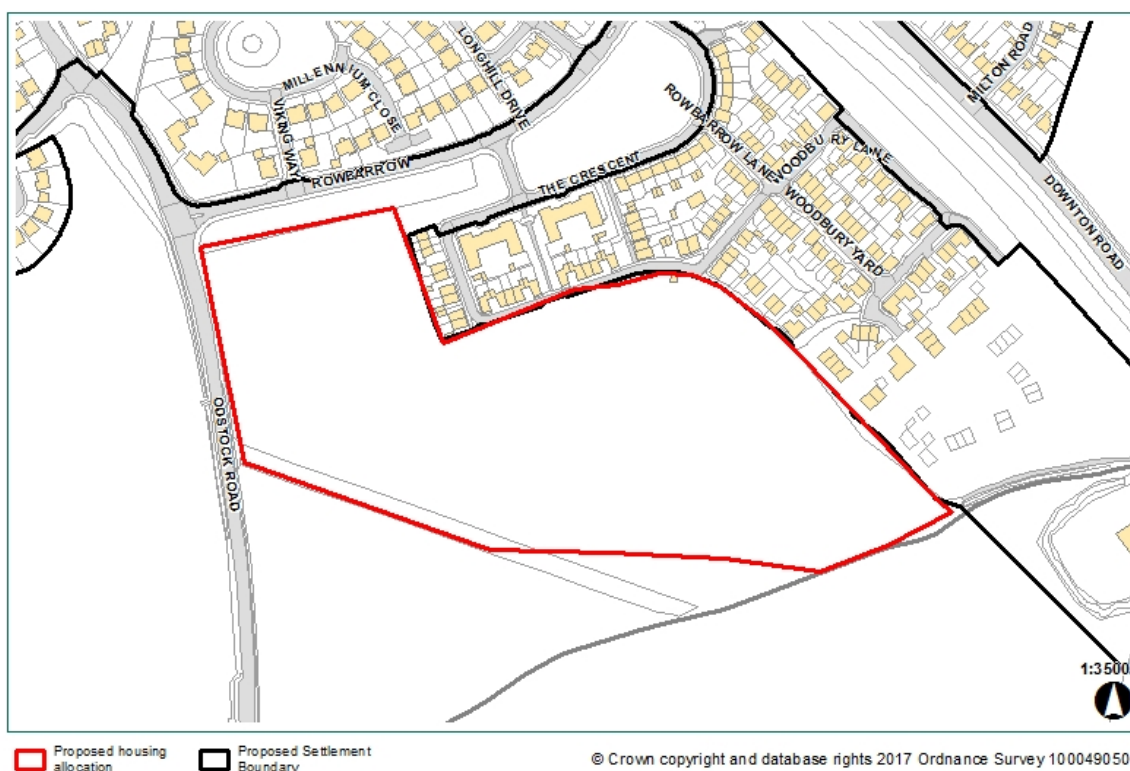
5.138 Land North of Netherhampton Road is allocated for the development of approximately 100 dwellings on 5.6ha of land as shown on the Policies Map. It is reasonably well located with regard to services and facilities. The site is relatively well contained in terms of visual impacts on the wider landscape. The extent of possible flood risks areas will need to be carefully surveyed so that development avoids them. A detailed flood risk assessment would be required in order to identify a set of appropriate sustainable drainage measures.

5.139 The area is sensitive in terms of the setting to the Cathedral and views towards it. Open space along the southern boundary will maintain views of the Cathedral spire travelling east. Design and layout taking account of a Heritage Impact Assessment would be capable of preventing development from having a harmful influence. Proposals would need to provide for a high quality, sustainable development that enhances an important approach to the City and provides links to nearby public rights of way.

5.140 In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. A new primary school on land south of Netherhampton Road would contribute to the new school places needed to serve the area. Funding contributions may also be sought where needed to increase capacity at local GP surgeries in the city.



### H3.4 Land at Rowbarrow, Salisbury



5.141 Land at Rowbarrow is allocated for the development of approximately 100 dwellings on 6.1ha of land as shown on the Policies Map. The development of the site would provide housing in a location with a reasonable level of access to the local services and facilities in Salisbury city centre but not within walking distance. There is however a frequent bus service within 100m of the site and the Park & Ride is in close proximity

5.142 Development will need to preserve the contribution made by the site to the setting and therefore to the importance of the Woodbury Ancient Villages Scheduled Monument. If necessary land will need to be set aside from development. Detailed design and layout will be guided by Heritage Impact Assessment. Scheduled monument consent will be required. The site also has high archaeological potential.

5.143 This is a sloping and quite prominent site. In combination with Heritage Impact Assessment, development will need to take place within a strong landscape framework that maintains and enhances the existing woodland belts affecting the site. Containment provided by the beech shelterbelt on the southern boundary should extend as a green corridor from the end of the shelterbelt eastwards towards the existing Rowbarrow housing development and woodland around the Milk & More Salisbury Depot. This would provide a setting for rights of way in the area and maintain their views of the Salisbury Cathedral spire.



5.144 In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. A new primary school on land south of Netherhampton Road would contribute to the new school places needed to serve the area. Funding contributions may also contribute to improving the existing primary schools at Harnham. Contributions may also be sought where needed to increase capacity at local GP surgeries in the city

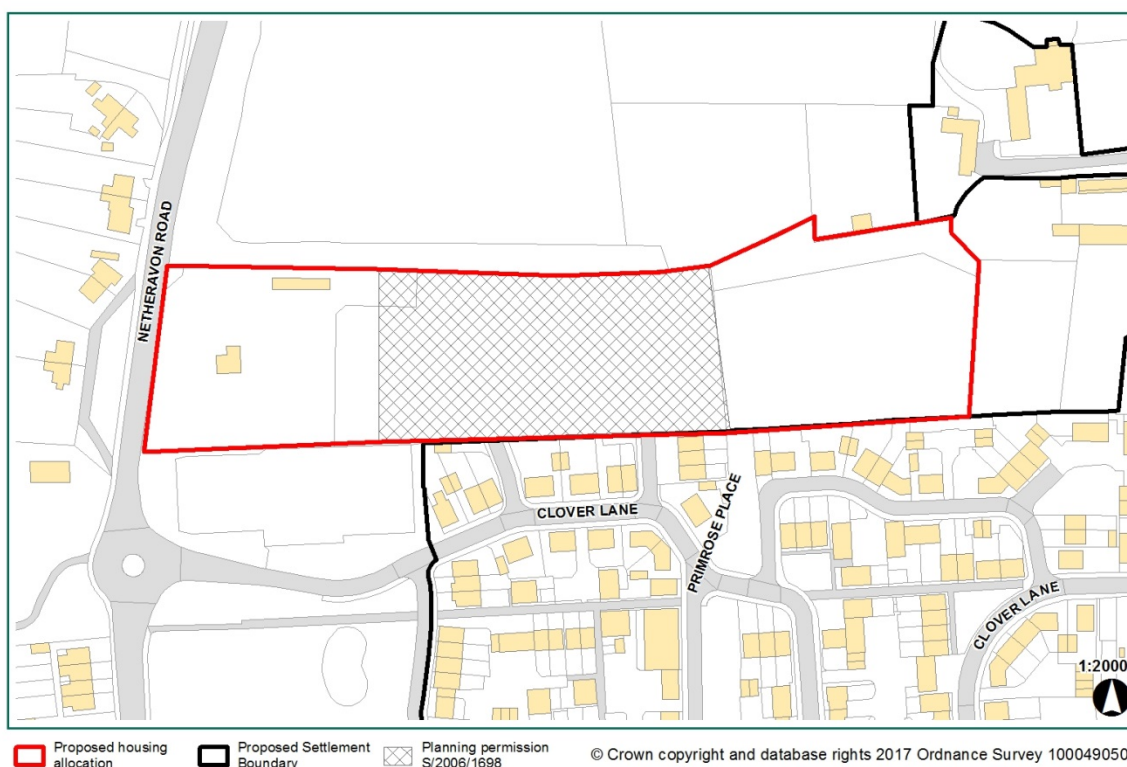
### **Amesbury, Bulford and Durrington**

5.145 The Wiltshire Core Strategy designates Durrington in conjunction with Bulford and Amesbury, as a Market Town. The WCS envisages accommodating approximately 2,440 dwellings over the plan period (2006 to 2026). The settlement strategy identifies a series of priorities including increasing jobs and homes to a moderate and proportionate extent. Development would also help to enhance services and facilities and promote better levels of self-containment, particularly at Durrington and Bulford. Provision of housing at Durrington would positively contribute towards the delivery of this objective by ensuring the viability of existing services and creating demand for an improved local offer.

5.146 The area has a high archaeological potential and assessment would be required to support planning applications for each of the sites proposed and this should also include avoiding harm to the outstanding universal value of the Stonehenge and Avebury World Heritage Site.

5.147 Upgrades to the local water supply network may be required to accommodate further growth at Durrington, pending a review of local abstraction licences due to be completed in 2019. It is possible that such upgrades may need to be completed before development at the following sites can commence.

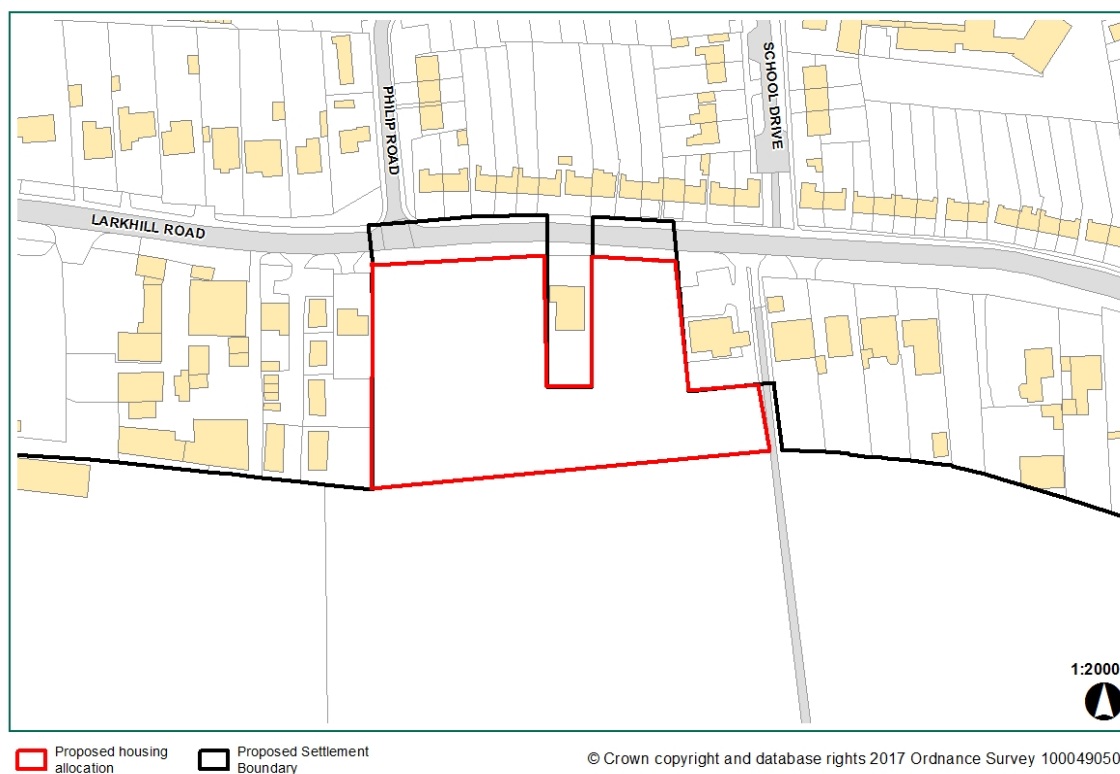
### H3.5 Clover Lane, Durrington



- 5.148 Approximately 1.8ha of land to the north of Clover Lane, Durrington is allocated for the development of approximately 45 dwellings, as identified on the Policies Map. The central portion of the site has planning permission already and could accommodate approximately 15 dwellings. Land for a further 30 dwellings is allocated for development on two parcels of land to the east and west of this central portion.
- 5.149 Vehicular access would be from the existing residential road network using Clover Lane. Pedestrian and cycle permeability through the site must be incorporated in the layout, including a direct link for pedestrian and cycle access through to the High St.
- 5.150 The site lies adjacent to the Durrington Conservation Area to the east and a number of Listed Buildings. Detailed design and layout would need to preserve or enhance the character of the conservation area and this is particularly important for the eastern portion of the site. Development should minimise the potential for harm to the significance of Listed Buildings and the Conservation Area. Informed by a Heritage Impact Assessment these considerations should be resolved through the detailed design and layout of a scheme.
- 5.151 There is a tree belt adjacent to the northern boundary of the site which is protected by a Tree Preservation Order and there are substantial hedgerows to the western boundaries. Mature trees and hedgerows must be retained as important features of the site, and additional green infrastructure should be

incorporated to enhance and protect these features in order to ensure a soft edge to the open countryside. A layout can link into open space to the south east of the site.

### H3.6 Larkhill Road, Durrington



5.152 Approximately 0.8ha of land to the south of Larkhill Road, Durrington is allocated for the development of approximately 15 dwellings, as illustrated on the Policies Map. The land forms the northern part of a field which slopes down towards the River Avon at the southern edge of Durrington.

5.153 The form of development should replicate the character and pattern of frontage development characteristic of Larkhill Road. Development as result will be limited and to a relatively low density. In order to soften the edge to the open countryside, the southern edge of the site should consist of gardens or open space with boundaries that are relatively open.

## 6. Settlement Boundary Review

### Introduction

- 6.1 The Council did not review the extent of the boundaries to inform the WCS and instead relied upon the former district local plans. They are reviewed as a part of preparing the Plan with the Plan Objective:
- To ensure there is a clear and accurate definition to the extent of the built up areas at Principal Settlements, Market Towns, Local Service Centres and Large Villages
- 6.2 The Plan applies one consistent methodology for the County to replace the slightly different ways used by the previous District Councils. The Council has developed this methodology in consultation with Parish and Town Councils. The process is explained in detail in Topic Paper 1: Settlement Boundary Review Methodology.
- 6.3 A comprehensive review of the boundaries ensures they are up-to-date and adequately reflect changes that have happened since they were first established. The Plan amends settlement boundaries where necessary.
- 6.4 It is also the prerogative of local communities to review Settlement Boundaries through neighbourhood planning. Neighbourhood Plans are required to be in general conformity with the WCS. Paragraphs 4.13 and 4.15 of the WCS support the review of settlement boundaries through the Plan or through neighbourhood plans. Therefore, where a neighbourhood plan has been considered to have reviewed the settlement boundary and is at a sufficiently advanced stage, then it is unnecessary to duplicate this work by reviewing the relevant settlement boundary in the Plan<sup>19</sup>.
- 6.5 Neighbourhood plans were considered to have reviewed their settlement boundaries where the issue has been explicitly addressed through the neighbourhood plan process, even if the eventual outcome is to retain the existing settlement boundary. Generally, when a neighbourhood plan submitted to the Council has reviewed a settlement boundary and proposes amendments, the Plan has not carried out a second review of the boundaries. Individual community area topic papers identify those settlements where the settlement boundary has been reviewed by a sufficiently advanced neighbourhood plan.
- 6.6 However, for settlements where the neighbourhood plan is not considered to have reviewed their boundary, or where there is no neighbourhood plan or

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<sup>19</sup> Up to April 2016, some settlement boundaries in Neighbourhood Plans have been updated to take account of implemented planning permissions.

one at an early stage, then the settlement boundary has been reviewed through the Plan.

- 6.7 Neighbourhood plans submitted subsequently will still be able to consider their own settlement boundary through the neighbourhood planning process. Once a future neighbourhood plan is 'made', its settlement boundaries will then supersede those in the Plan.

### **Amended Settlement Boundaries**

- 6.8 The Plan makes amendments to the following settlement boundaries:

**East Wiltshire HMA: Amended Settlement Boundaries**

<b>Community Area</b>	<b>Settlement Boundaries reviewed by the Wiltshire Housing Site Allocations Plan</b>	<b>Settlement Boundaries not reviewed because of Neighbourhood Plans</b>
<b>Devizes<sup>20</sup></b>		
	Devizes	Potterne
	Bromham	Urchfont
	Market Lavington	
	Rowde	
	West Lavington and Littleton Panell	
	Worton	
<b>Marlborough</b>		
	Aldbourn	
	Baydon	
	Broad Hinton	
	Marlborough	
	Ramsbury	
<b>Tidworth</b>		
	Collingbourne Ducis	
	Ludgershall	
	Netheravon	
	Tidworth	
<b>Pewsey</b>		
	Burbage	Pewsey
	Great Bedwyn	
	Shalbourne	
	Upavon	

**North and West Wiltshire HMA: Amended Settlement Boundaries**

<b>Community Area</b>	<b>Settlement Boundaries reviewed by the Wiltshire Housing Site Allocations Plan</b>	<b>Settlement Boundaries not reviewed because of Neighbourhood Plans</b>
<b>Bradford on Avon</b>		
	Westwood	Bradford on Avon
	Winsley	Holt
<b>Calne</b>		
	Calne	

<sup>20</sup> Devizes has a made Neighbourhood Plan which is considered to review its settlement boundary. The Devizes Neighbourhood Plan had the intention of including its site allocations within its settlement boundary however one allocation was omitted in error. Wiltshire Council have not conducted a wholesale review of the settlement boundary of Devizes however it does include the site omitted from the boundary in error in the Neighbourhood Plan.

Community Area	Settlement Boundaries reviewed by the Wiltshire Housing Site Allocations Plan	Settlement Boundaries not reviewed because of Neighbourhood Plans
	Studley and Derry Hill	
<b>Chippenham<sup>21</sup></b>		
	Christian Malford	
	Hullavington	
	Kington St Michael	
	Sutton Benger	
	Yatton Keynell	
<b>Corsham</b>		
	Box	
	Colerne	
	Corsham	
	Rudloe	
<b>Malmesbury</b>		
	Malmesbury	Great Somerford
	Ashton Keynes	
	Crudwell	
	Oaksey	
	Sherston	
<b>Melksham</b>		
	Atworth	
	Melksham	
	Seend	
	Semington	
	Shaw and Whitley	
	Steeple Ashton	
<b>Royal Wootton Bassett and Cricklade</b>		
	Cricklade	
	Lyneham	
	Purton	
	Royal Wootton Bassett	
<b>Trowbridge</b>		
	Hilperton	
	North Bradley	
	Southwick	
	Trowbridge	
<b>Warminster</b>		
	Chapmanslade	
	Codford	

<sup>21</sup> The settlement boundary for the town of Chippenham has been reviewed by the Chippenham Site Allocations Plan.



Community Area	Settlement Boundaries reviewed by the Wiltshire Housing Site Allocations Plan	Settlement Boundaries not reviewed because of Neighbourhood Plans
	Corsley	
	Heytesbury	
	Sutton Veny	
	Warminster	
<b>Westbury</b>		
	Bratton	
	Dilton Marsh	
	Westbury	

**South Wiltshire HMA: Amended Settlement Boundaries**

Community Area	Settlement Boundaries reviewed by the Wiltshire Housing Site Allocations Plan	Settlement Boundaries not reviewed because of Neighbourhood Plans
<b>Amesbury</b>		
	Amesbury	Porton (Idmiston NP)
	Bulford	
	Durrington	
	Great Wishford	
	Shrewton	
	The Winterbournes	
	Tilshead	
<b>Mere</b>		
	Mere	
<b>Salisbury</b>		
	Salisbury	
<b>Southern Wiltshire</b>		
	Alderbury	
	Combe Bissett	
	Downton	
	Morgan Vale and Woodfalls	
	Pitton	
	Whiteparish	
	Winterslow	
<b>Tisbury</b>		
	Fovant	
	Hindon	
	Ludwell	
	Tisbury	
<b>Wilton</b>		
	Broad Chalke	

	Dinton	
	Wilton	

**Figure 17: Amended Settlement Boundaries**

6.9 Previous and amended boundaries are shown for settlements in each HMA in Appendix One. Plans in Community Area Topic Papers have each map accompanied by a table of changes from the current adopted boundary.

## 7. Implementation and Monitoring

- 7.1 The Plan is designed to be flexible and contain appropriate levels of contingency, so that it can effectively respond to events if necessary. However, it will be essential to monitor the effectiveness of the strategy, so that action can be taken to address any issues which may arise. This monitoring will be done through the following mechanisms
- 7.2 Central to monitoring the effectiveness of the plan will be the use of Housing Trajectories. One of the two purposes of the plan is to maintain a five year land supply in each of Wiltshire's Housing Market Area (HMA). Therefore monitoring the delivery of houses is critical. Basically a housing trajectory is a graph which plots the expected rate of housing delivery over a plan period and then may be used to overlay actual delivery so that the success of the policies can be evaluated.
- 7.3 As advised in Planning Policy Guidance, housing trajectories are an important tool for monitoring housing delivery. In line with this guidance, Wiltshire Council will carry out an annual assessment in a robust and timely fashion, based on up-to-date and sound evidence, taking into account the anticipated trajectory of housing delivery, and consideration of associated risks, and an assessment of the local delivery record. The assessment will be realistic and made publicly available in an accessible format.
- 7.4 By taking a thorough approach on an annual basis, the Council will be in a strong position to demonstrate a robust five year supply of sites. Demonstration of a five year supply is a key material consideration when determining housing applications and appeals. As set out in the NPPF<sup>22</sup>, a five year supply is also central to demonstrating that relevant policies for the supply of housing are up-to-date in applying the presumption in favour of sustainable development.
- 7.5 There are four main components of the monitoring framework.

### Wiltshire Monitoring Framework

- 7.6 The Wiltshire Monitoring Framework ([www.wiltshire.gov.uk](http://www.wiltshire.gov.uk)) was published alongside the WCS, and will also be used to check on the effectiveness of the policies within this document. The Monitoring Framework will be used to ask whether the policy is working, whether it is delivering the homes, which is the underlying objective of the policy, and what the significant effects of this are. It sets out objectives and targets for each policy, and identifies the indicators which will be used to assess progress against these. The Wiltshire Monitoring Framework will ensure that the Core Strategy is steered by a continuous process of 'plan, monitor, manage'.

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<sup>22</sup> NPPF, paragraph 11, DCLG (Mar 2012)

## Annual Monitoring Report

- 7.7 An annual report will be prepared to analyse the impacts of the Core Policies of the WCS, and assess progress against the targets identified in the Wiltshire Monitoring Framework. This Annual Monitoring Report (AMR) will include monitoring of the proposals in the Plan and also information relating to the Infrastructure Delivery Plan (IDP) and the Sustainability Appraisal (SA). Actions required to address policy performance against the Plan Objectives will then be reconsidered

## Housing Land Supply

- 7.8 In line with National Policy / Guidance, the council monitors the number of new homes built each year, homes currently under construction and those that are expected to be built in the future. This evidence is set out in the 'Housing Land Availability Report' and 'Housing Land Supply Statement' ([www.wiltshire.gov.uk](http://www.wiltshire.gov.uk)) the latter used to present the Council's 5-year housing land supply position. The proposals set out within the Plan (along with the proposals in the adopted Core Strategy and Chippenham Site Allocations Plan are intrinsically linked to the maintenance of the supply position and hence will need to be monitored to ensure timely delivery. In order to assist the monitoring process, developers / landowners will be asked to provide the Council with detailed site delivery trajectories.
- 7.9 In addition to the monitoring of the Plan's performance, the Council is also obliged to monitor housing delivery from neighbourhood plans and 'windfall' sites in line with the advice set out in the Planning Practice Guidance.
- 7.10 Further, national policy requires Local Planning Authorities to produce plans that meet the tests of soundness, which include that plans are 'positively prepared'<sup>23</sup>. This necessitates a proactive approach to identifying and allocating sites to ensure the housing requirements can be met, rather than awaiting anticipated delivery from windfall sites. The Plan proposals ensure that there is no reliance on windfall to provide the minimum housing requirements of each HMA. That is, the Plan does what it was designed to do, which is to maintain surety of supply throughout the plan period prescribed by the WCS (Objective 2).

## Management of risk – a risk register

- 7.11 A part of monitoring the effectiveness of the Plan will be to maintain a risk register. It will be used to manage risks by identifying them as they arise, evaluating their severity and identifying measures to treat them through appropriate mitigation measures that are either preventative or contingencies.



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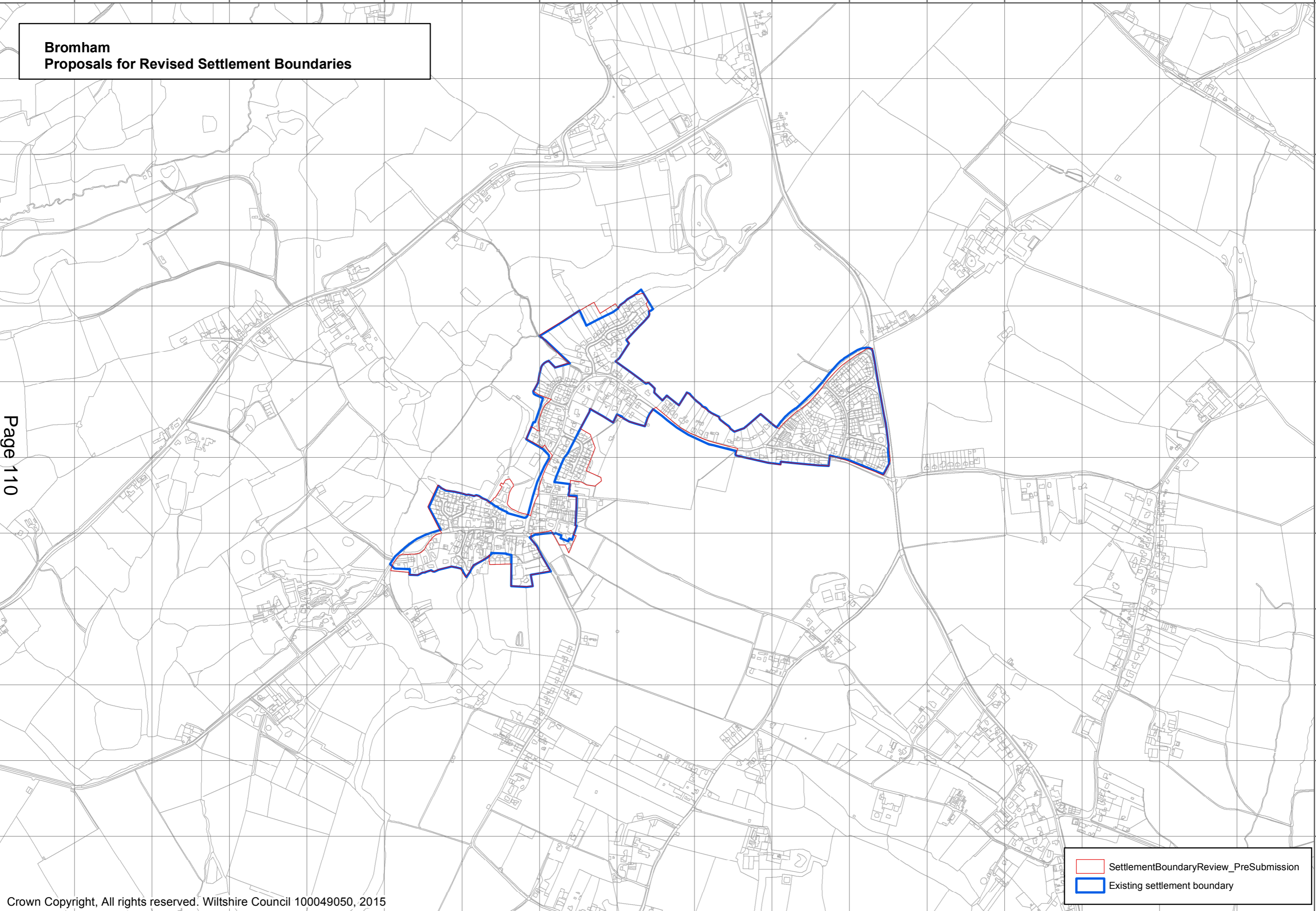
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**Bromham  
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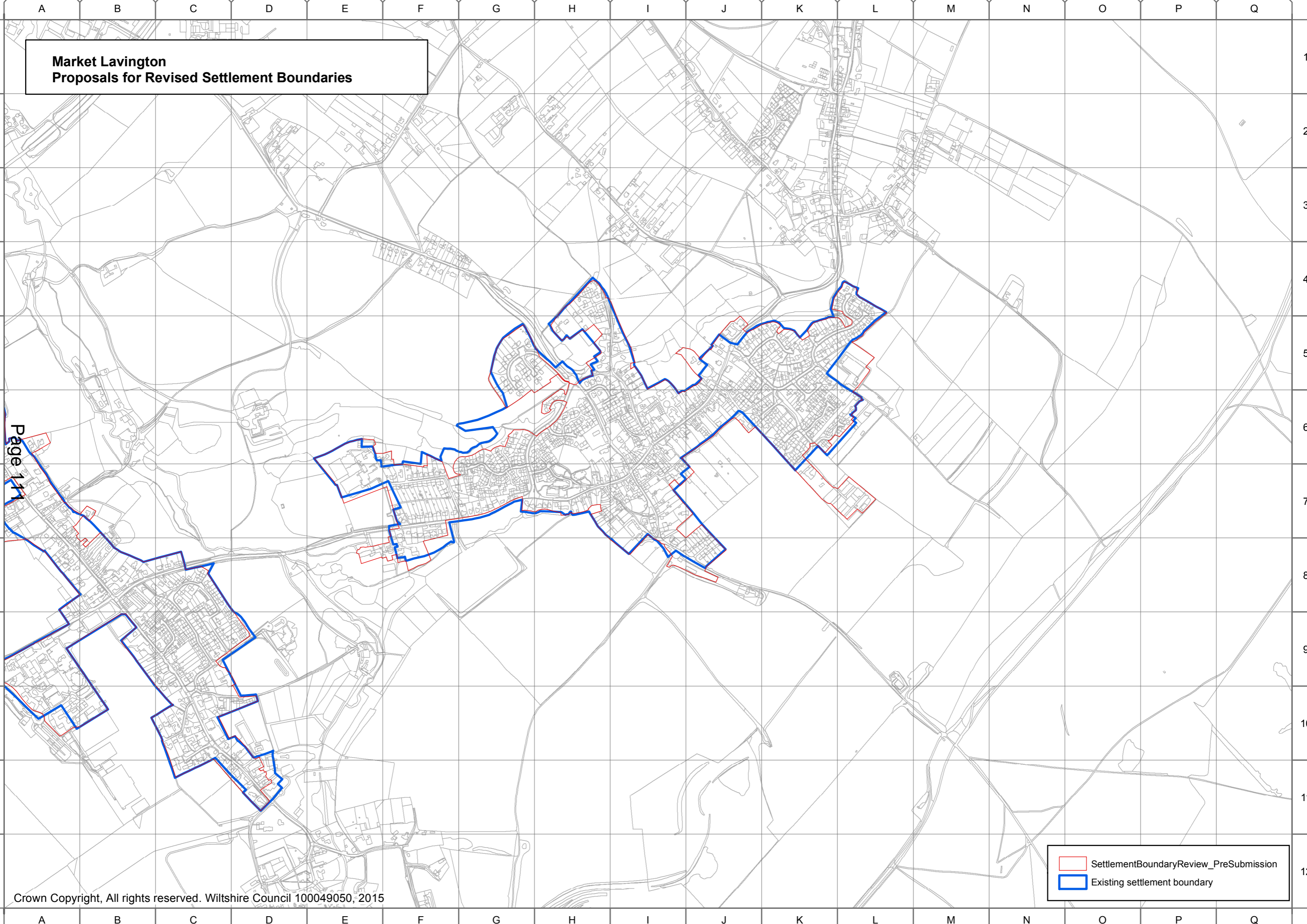


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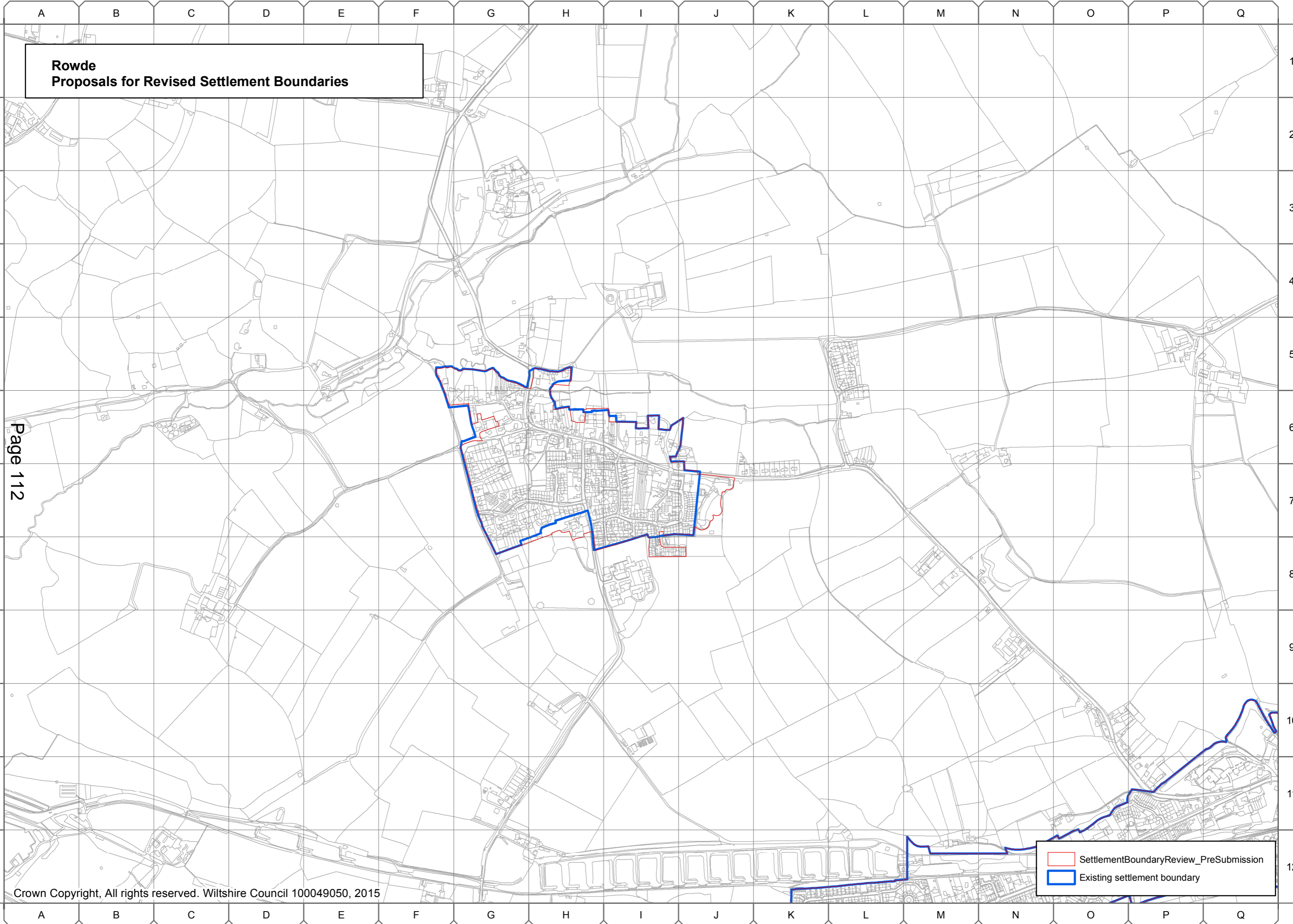


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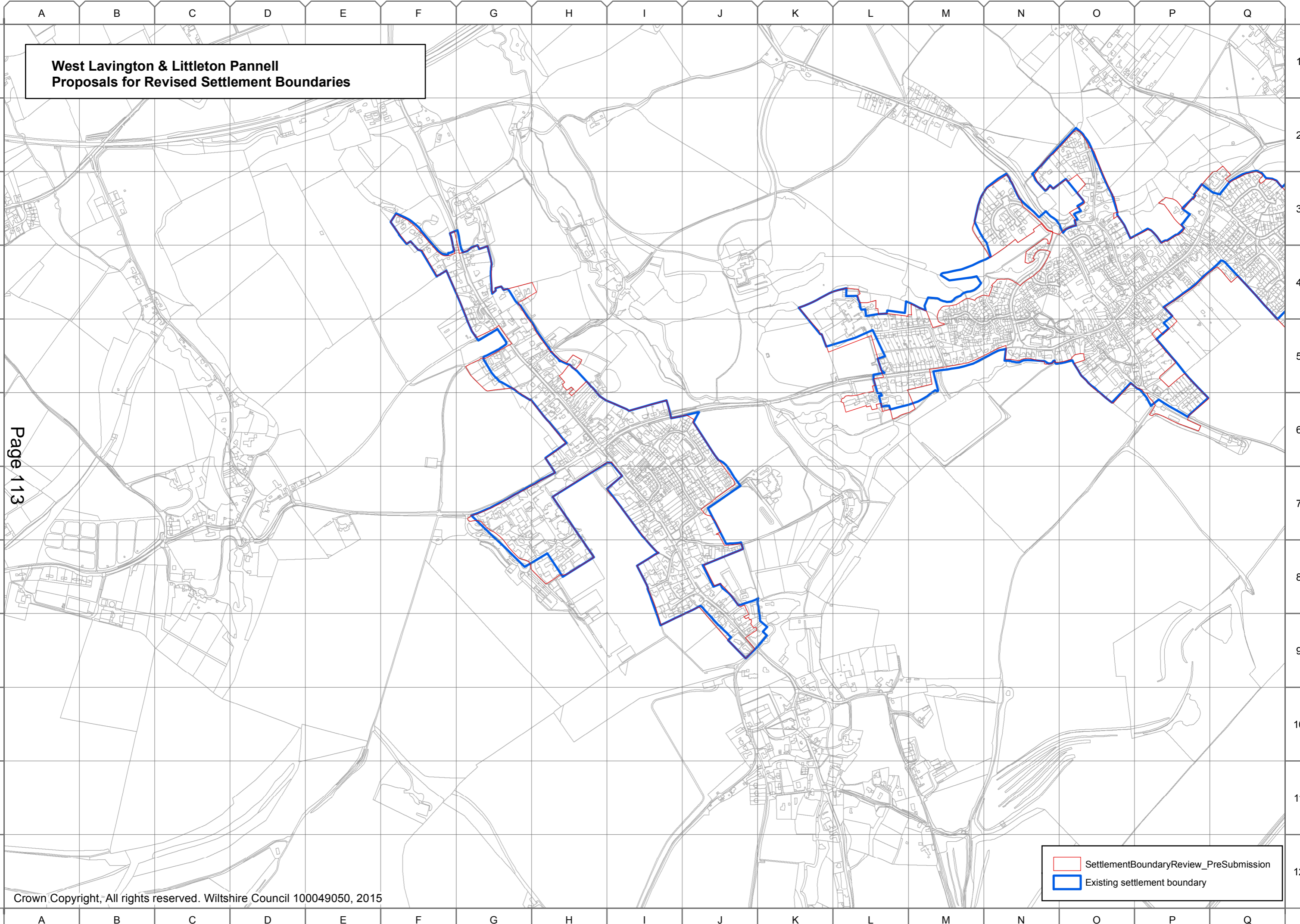
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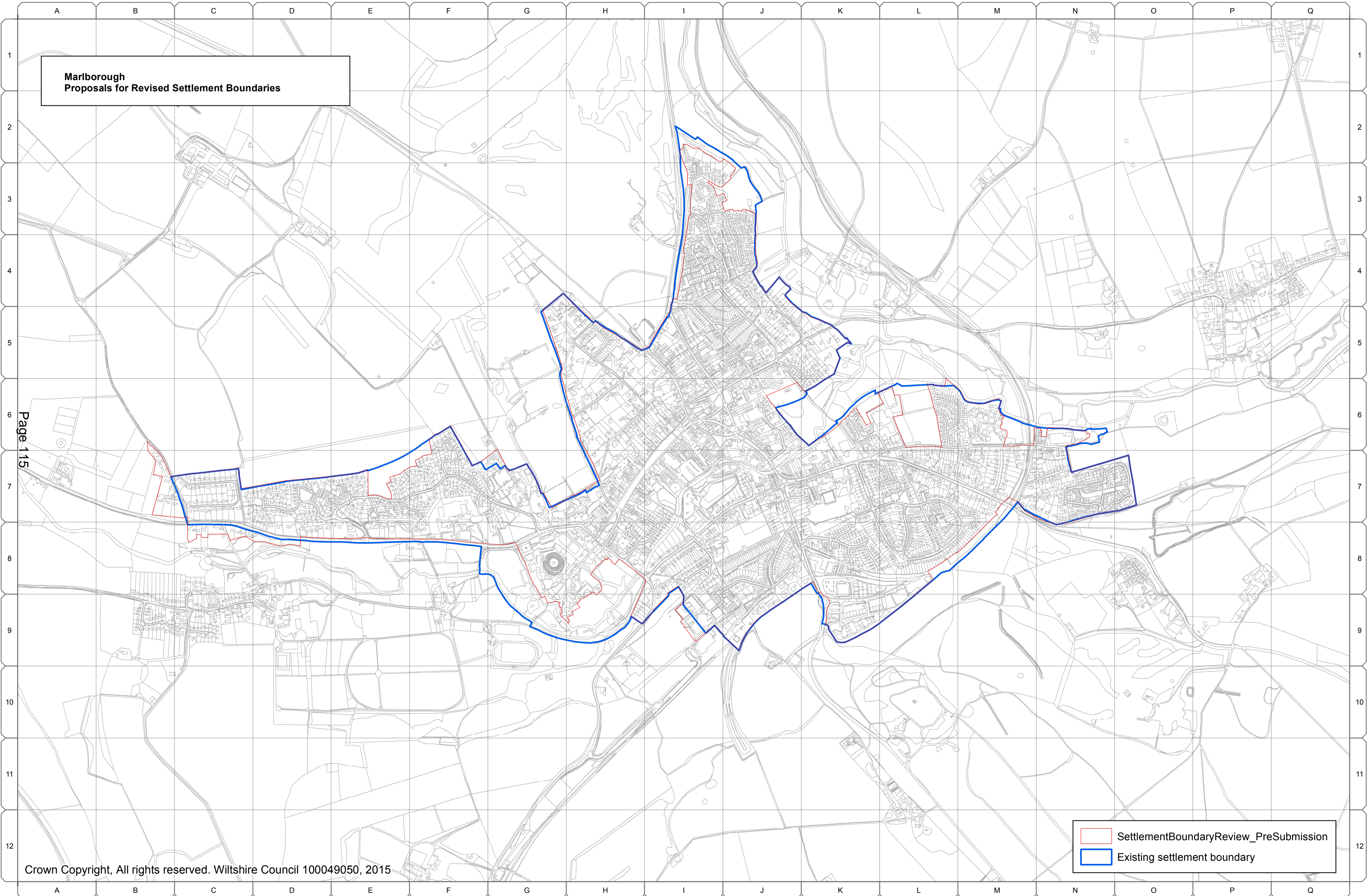




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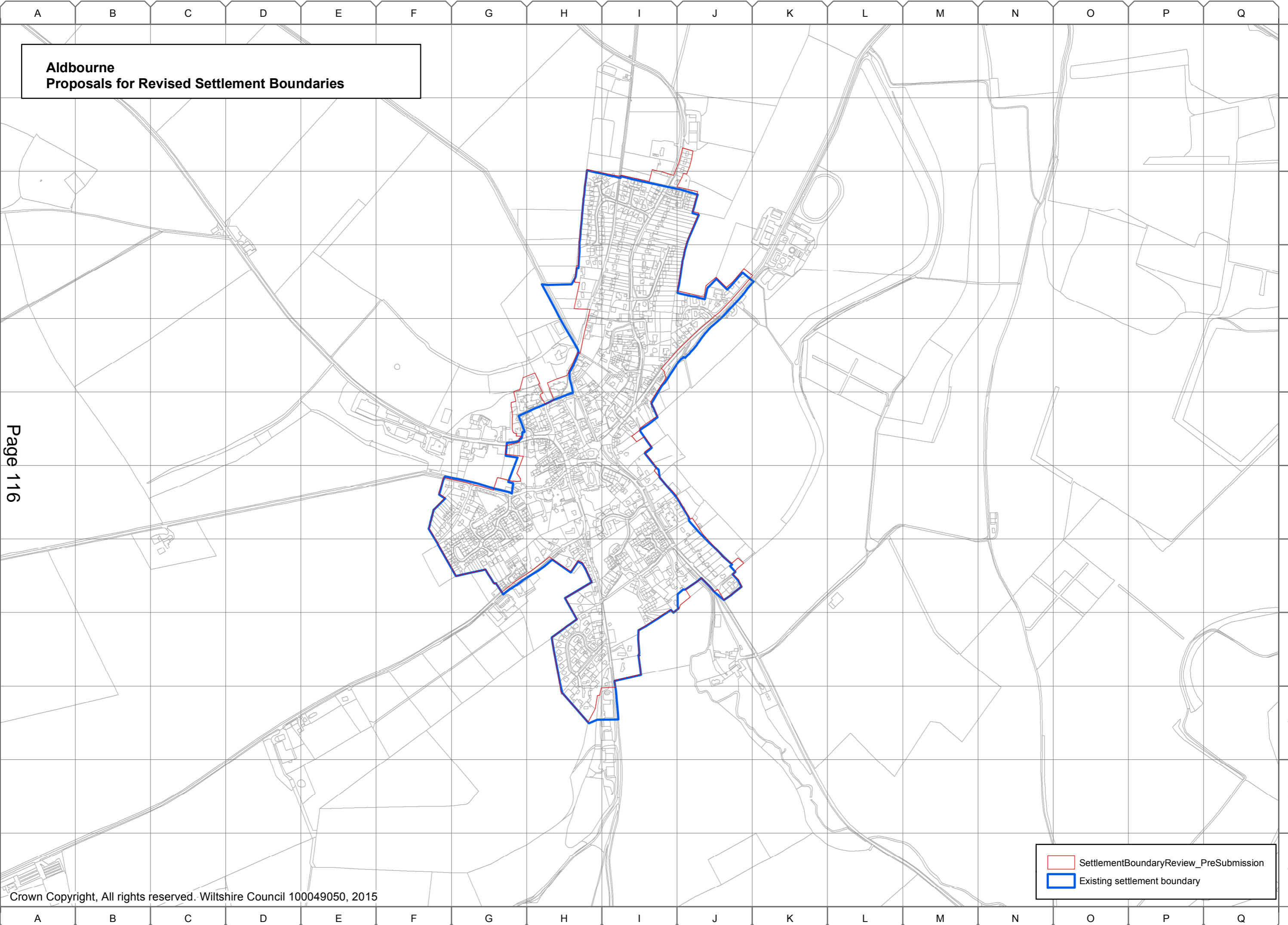
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**Aldbourn  
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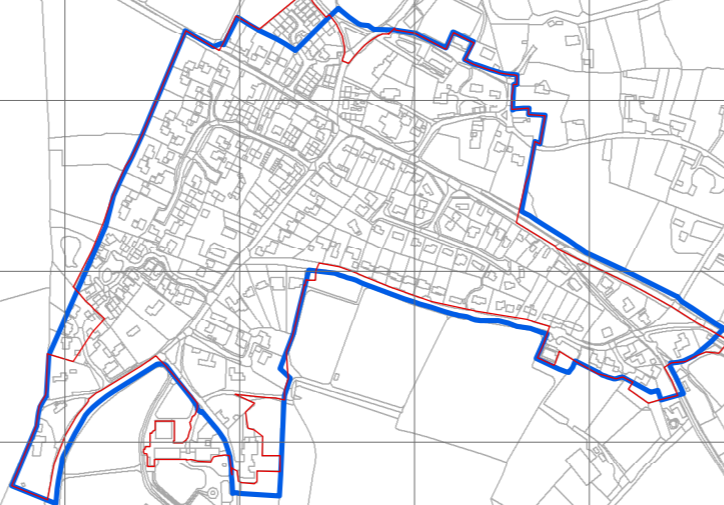
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**Broad Hinton  
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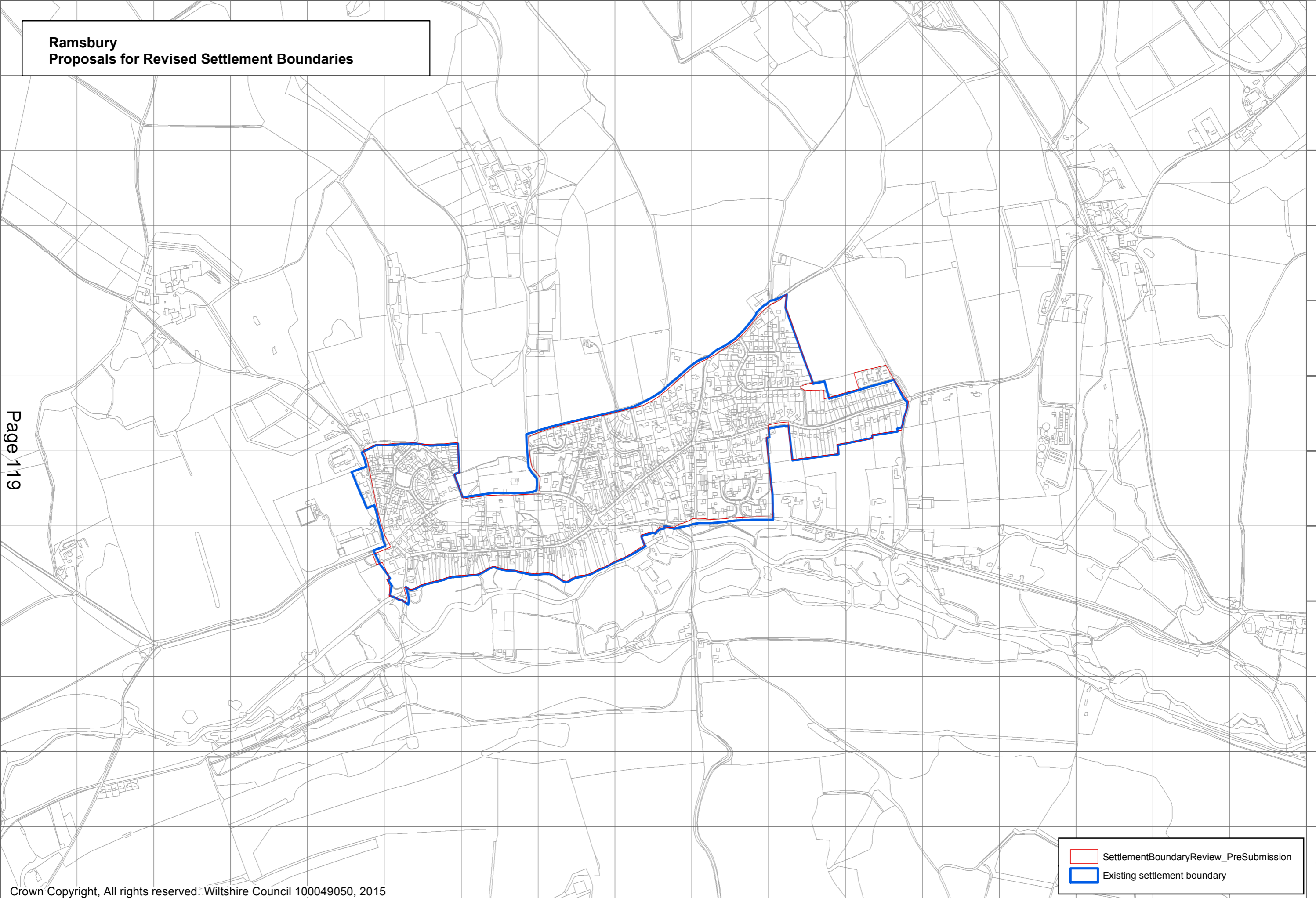
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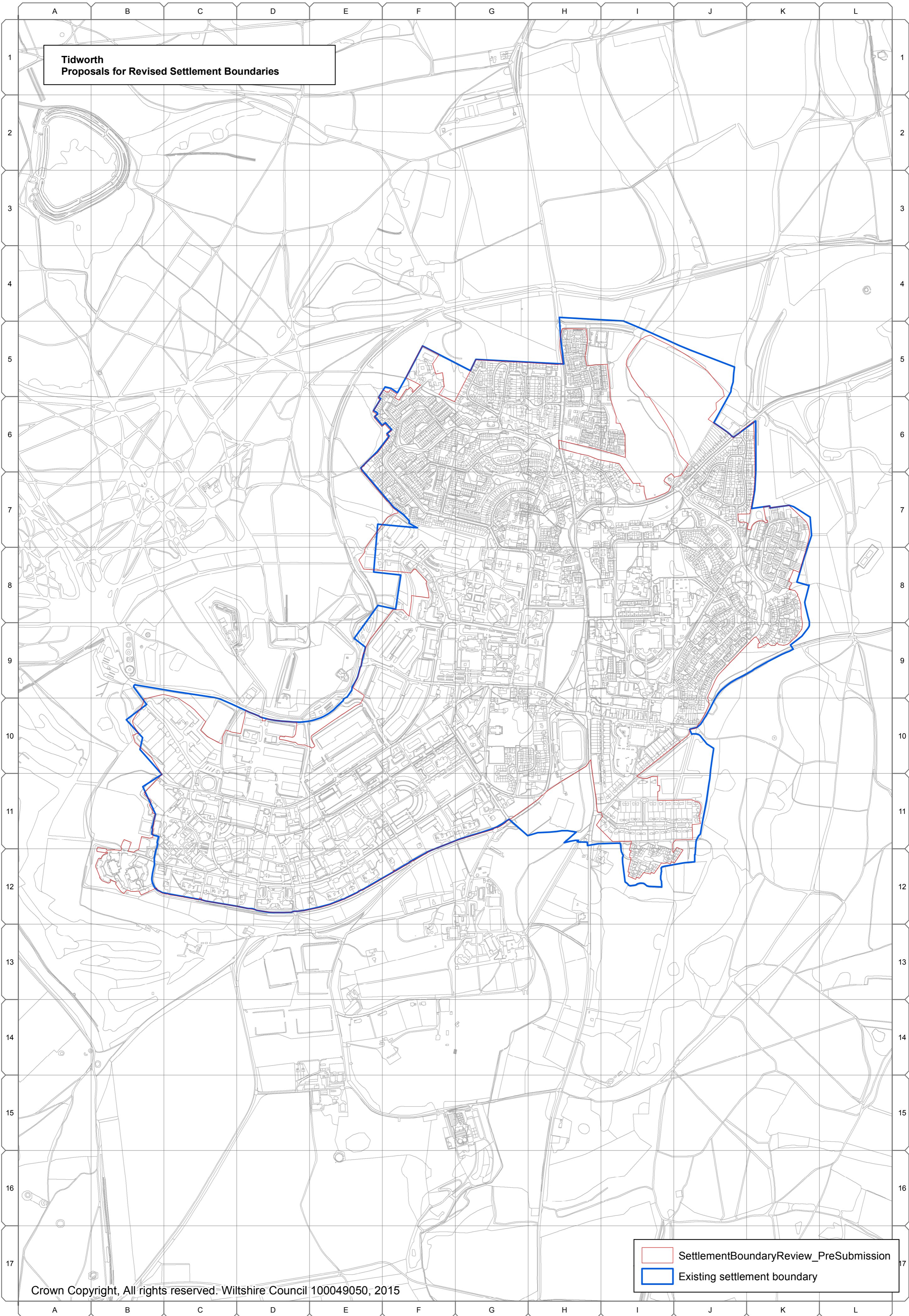
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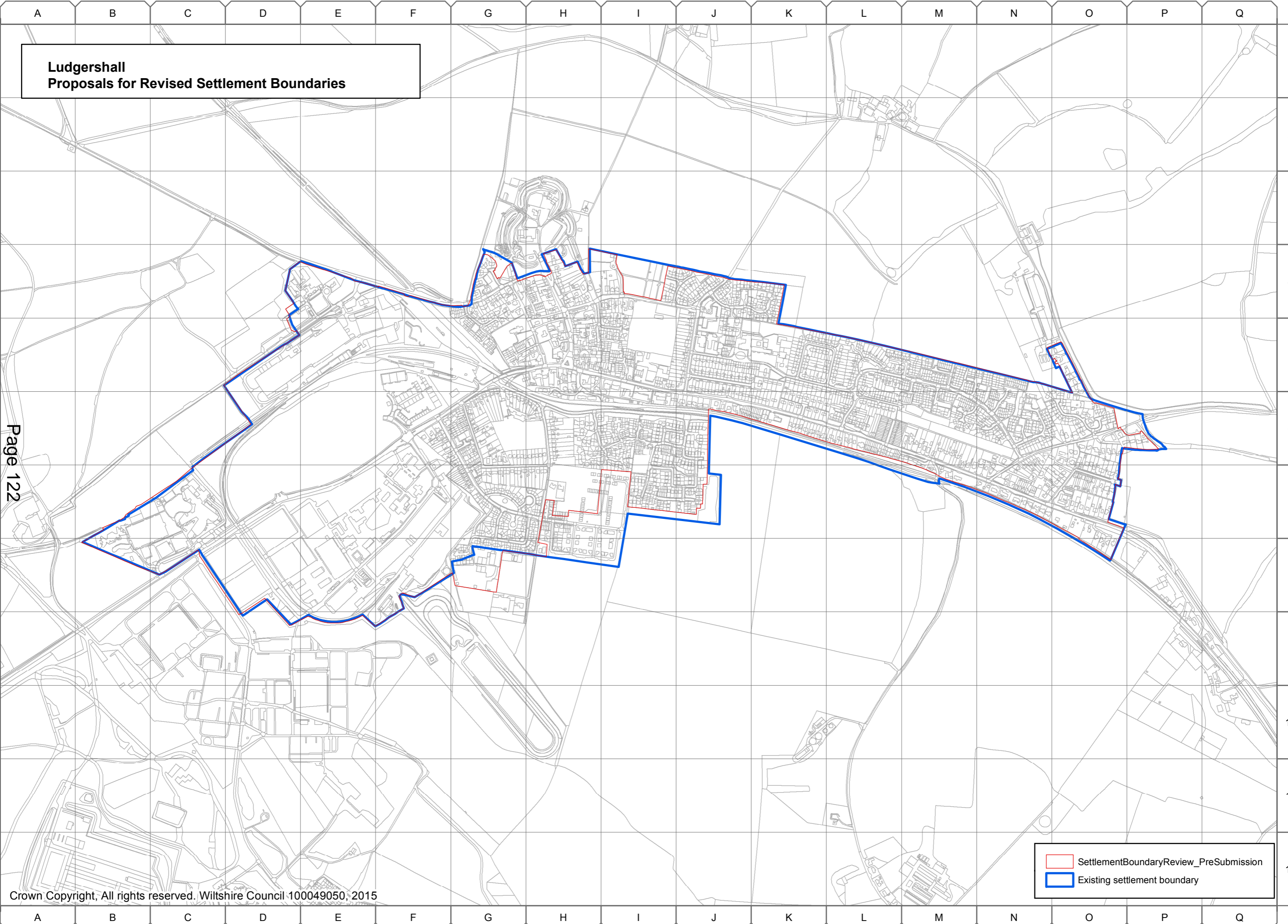
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**Collingbourne Ducis  
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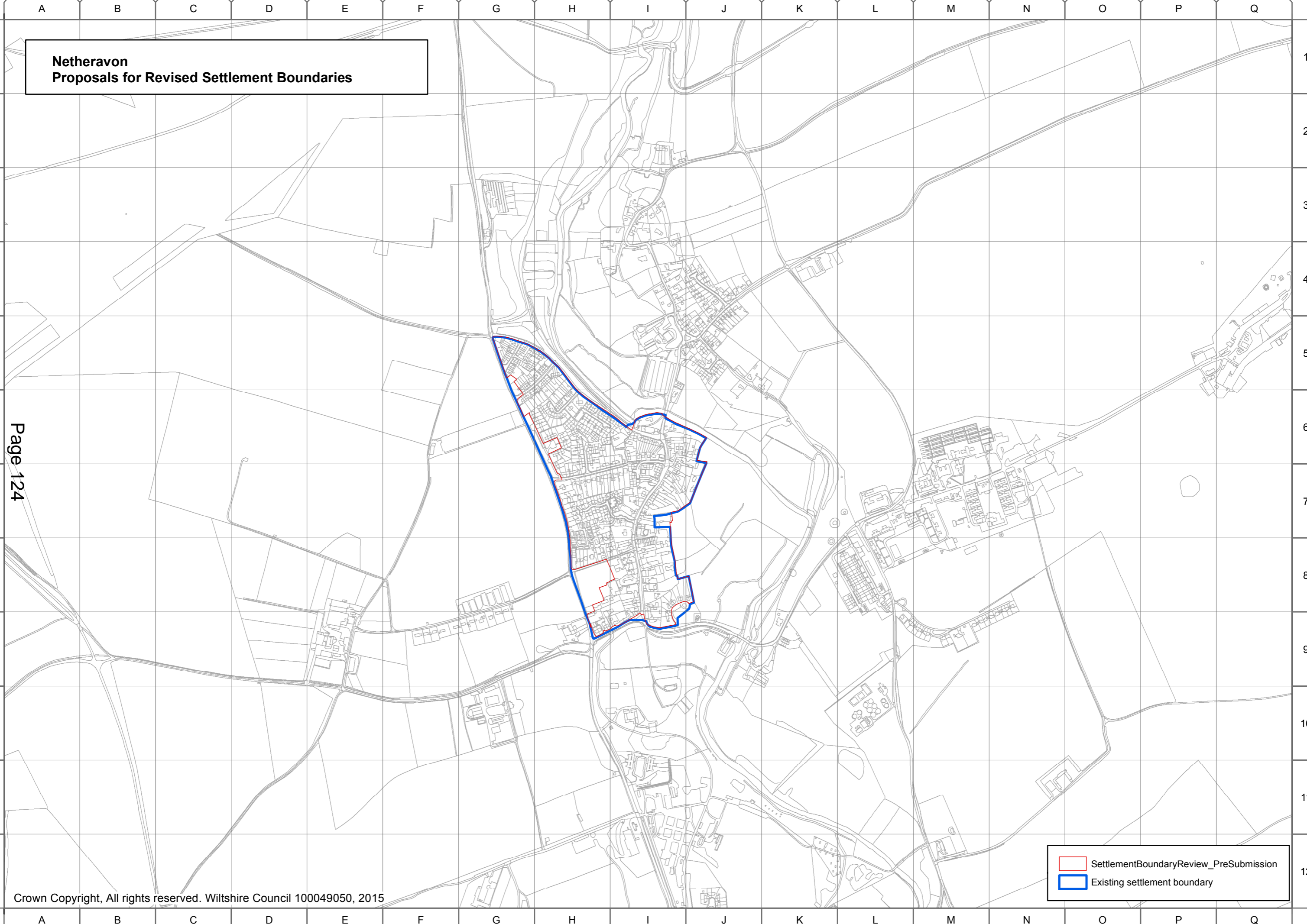
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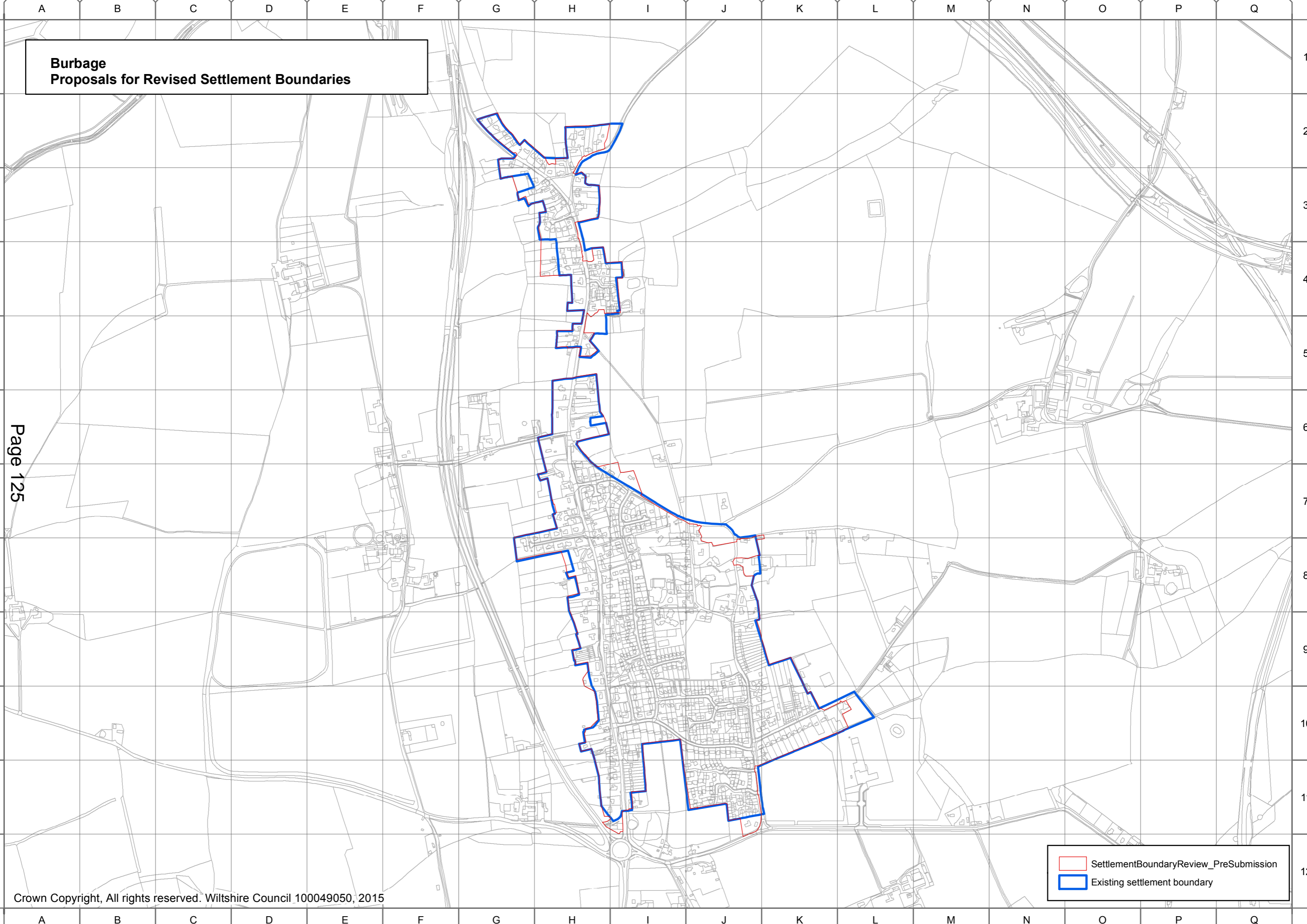
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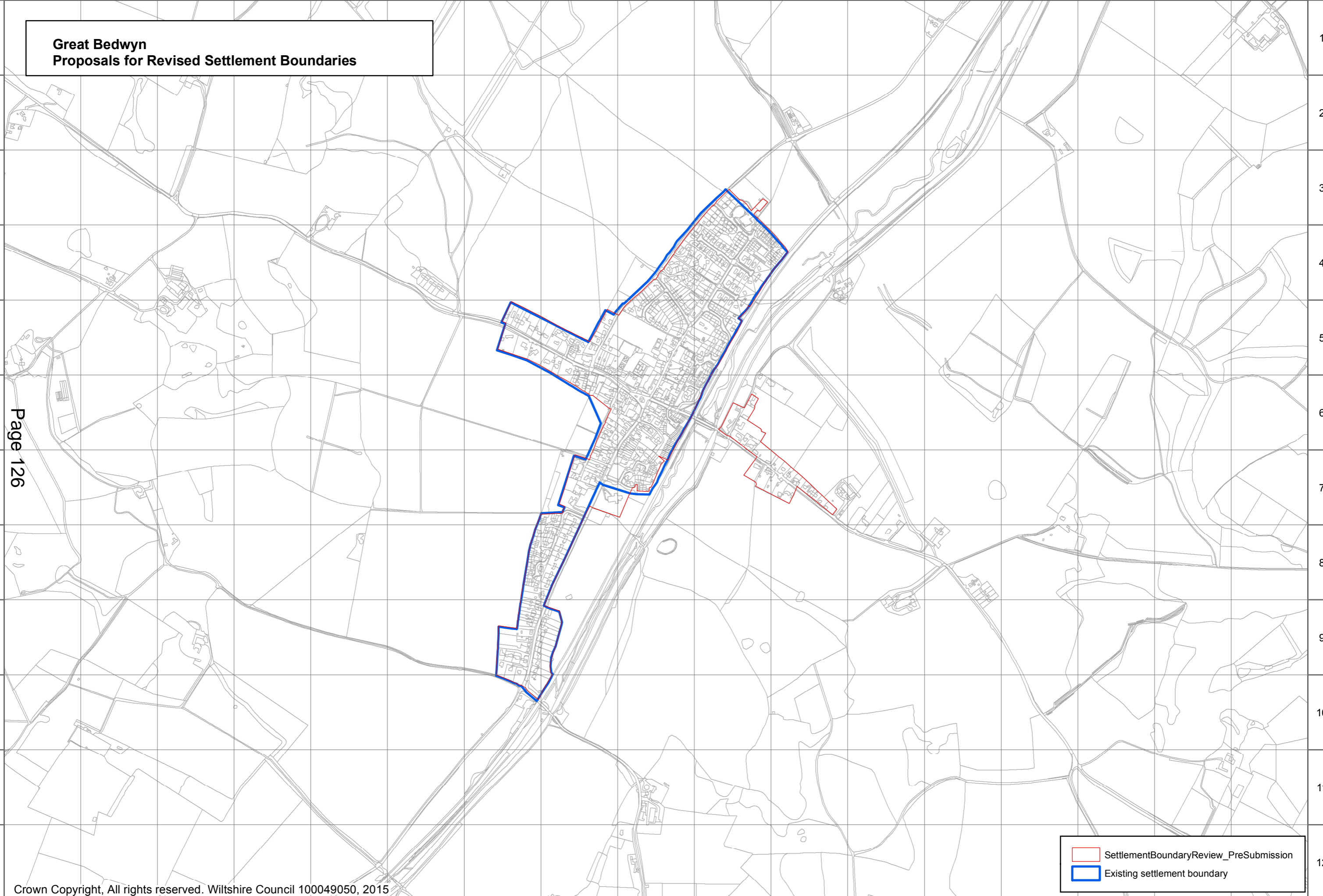




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**Great Bedwyn  
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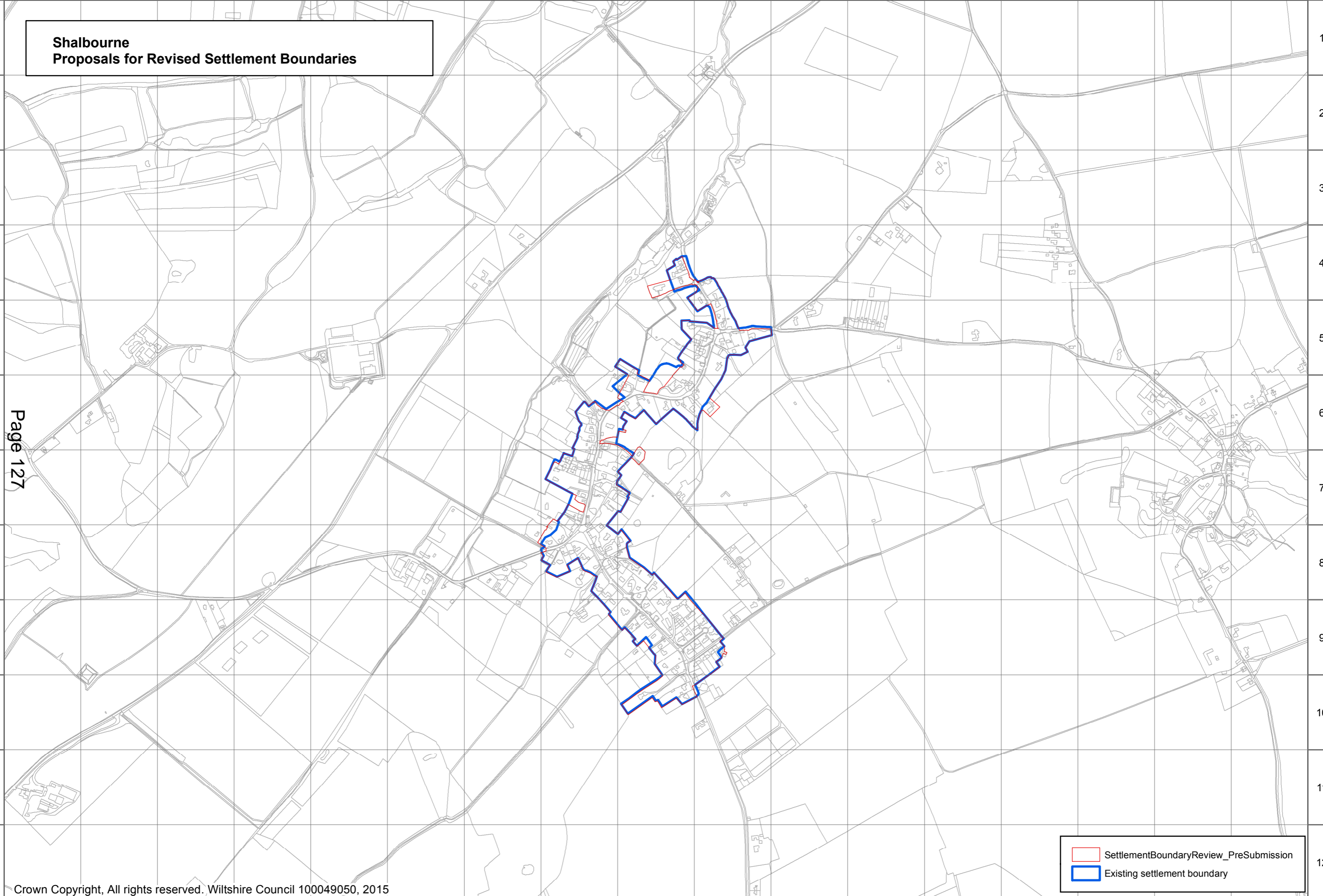
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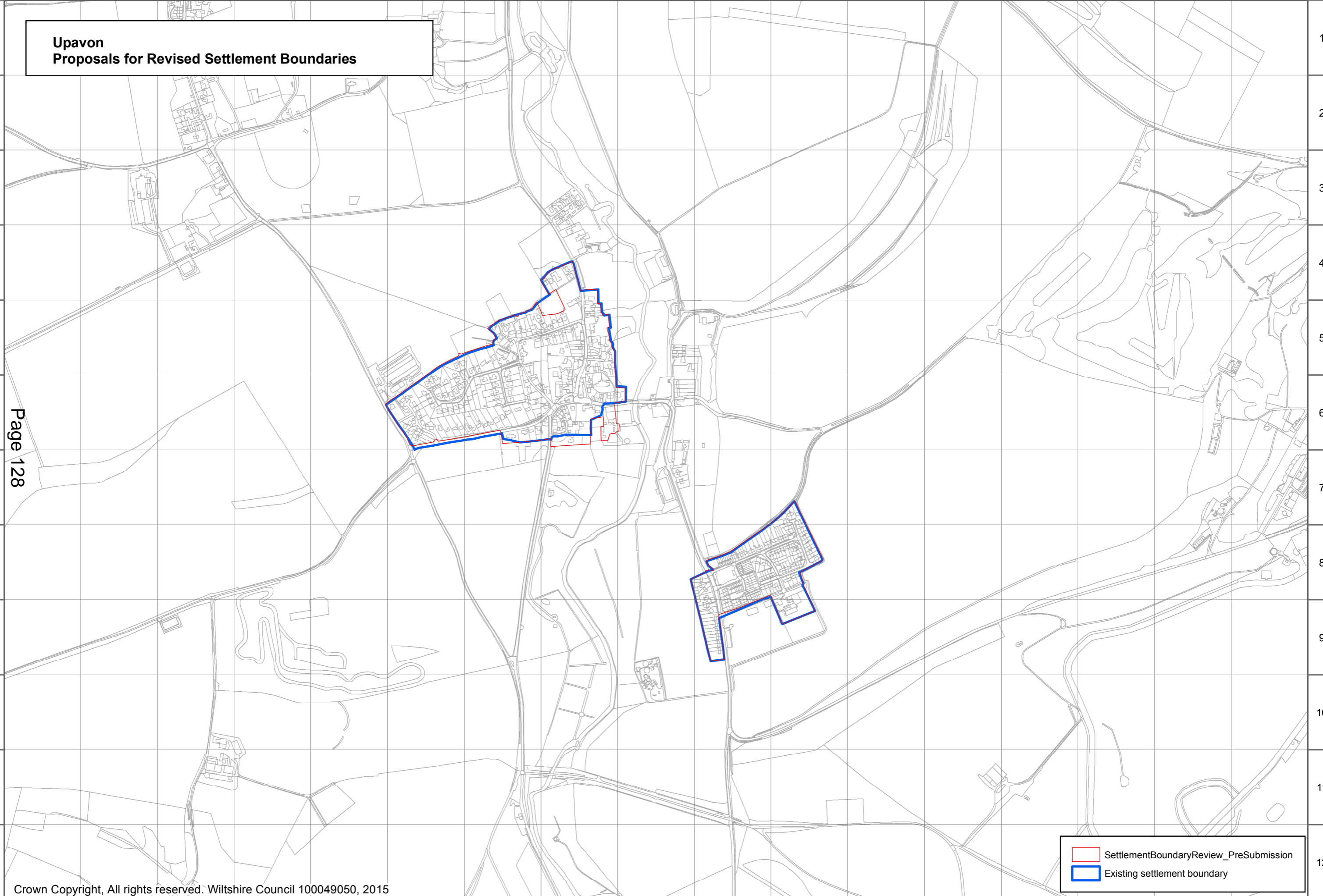
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**Upavon  
Proposals for Revised Settlement Boundaries**



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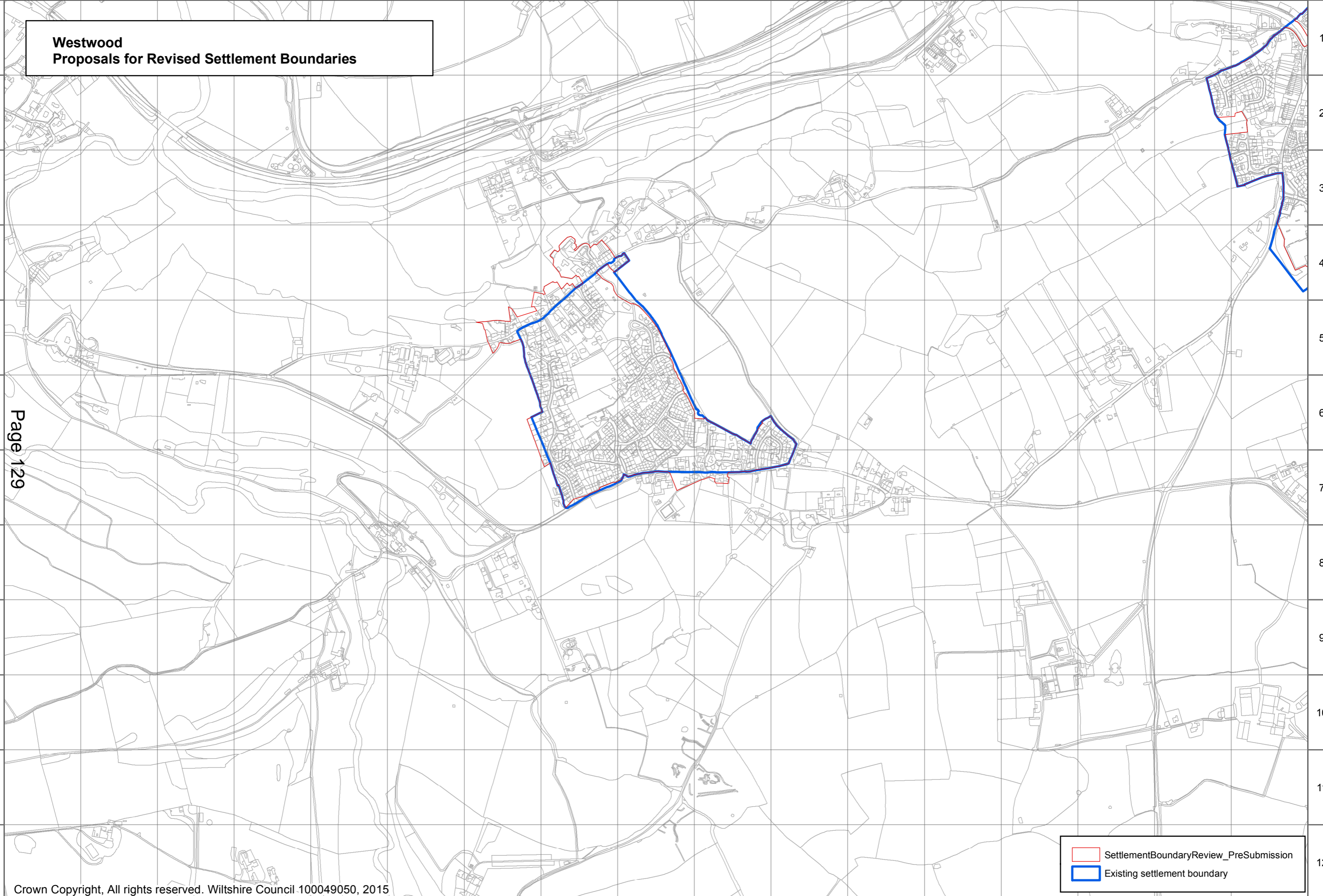


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**Westwood  
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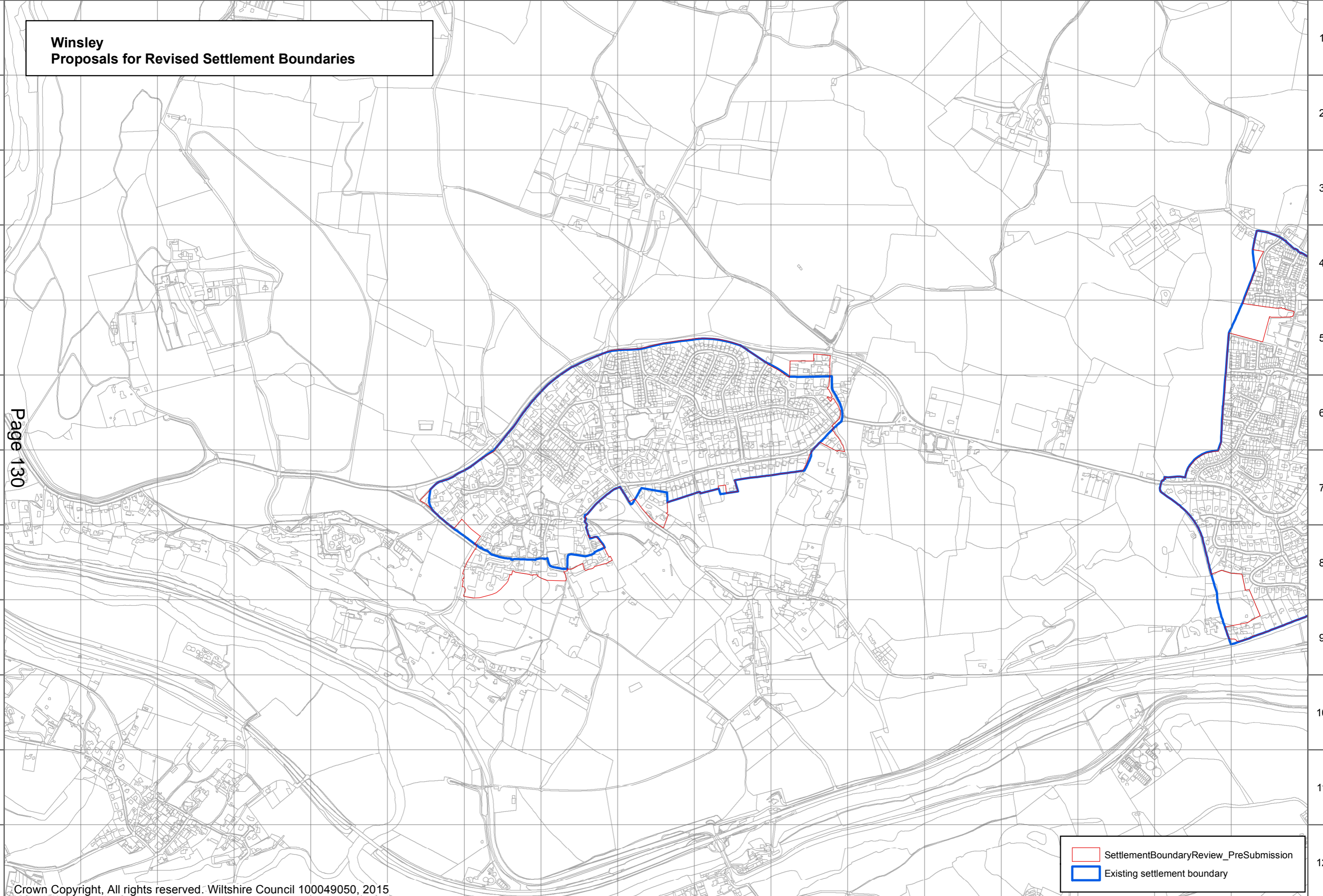
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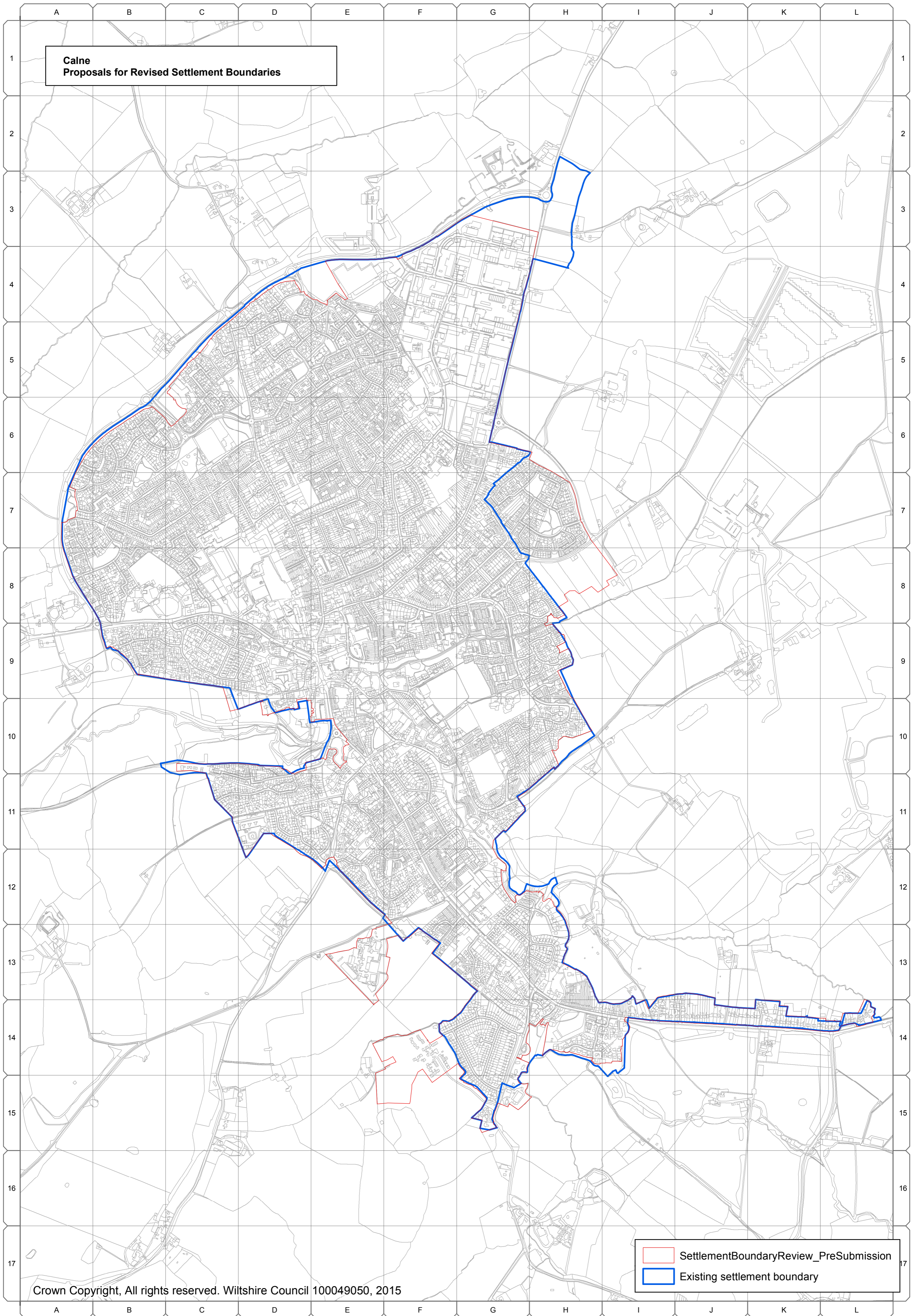


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**Calne  
Proposals for Revised Settlement Boundaries**

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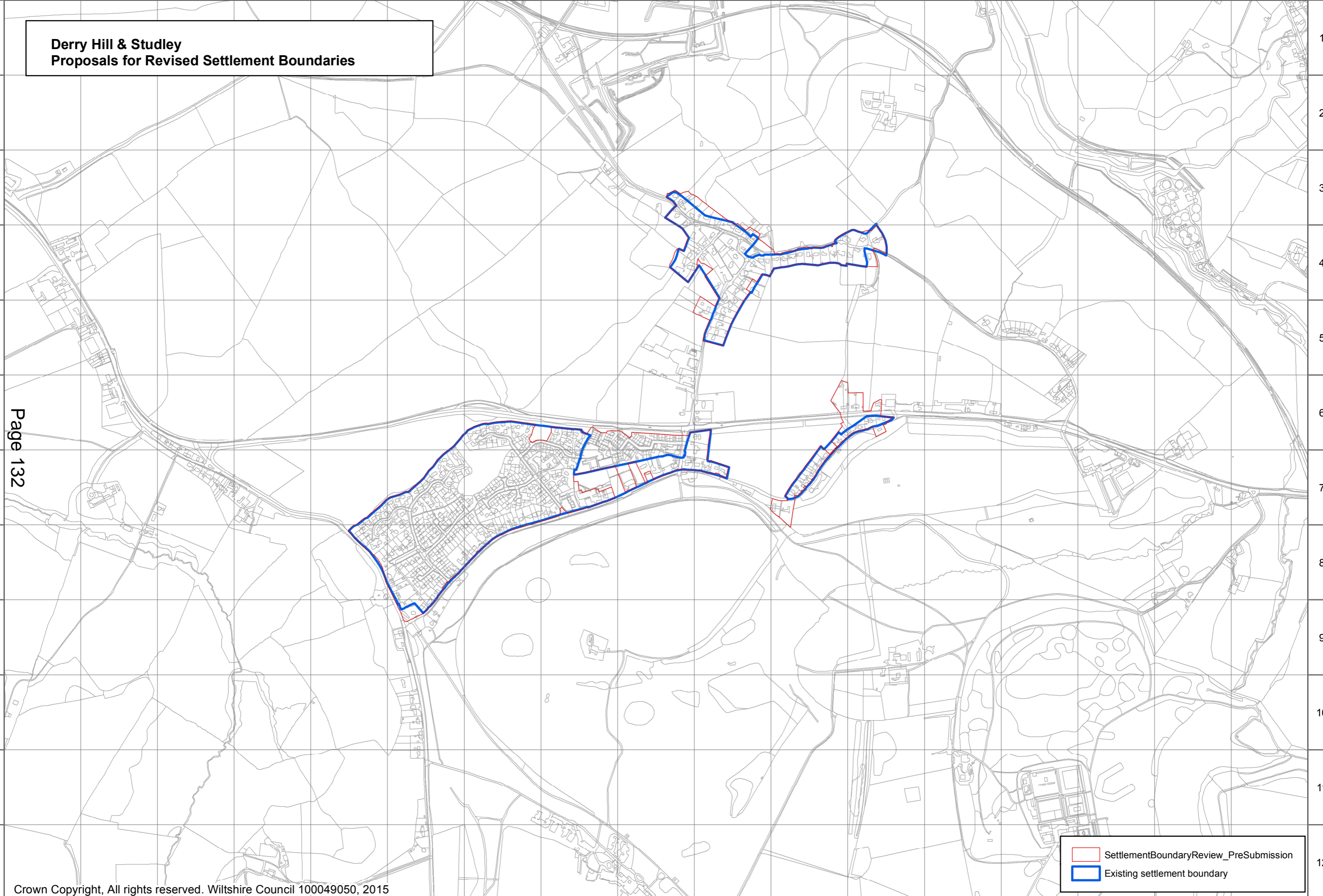


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**Derry Hill & Studley  
Proposals for Revised Settlement Boundaries**

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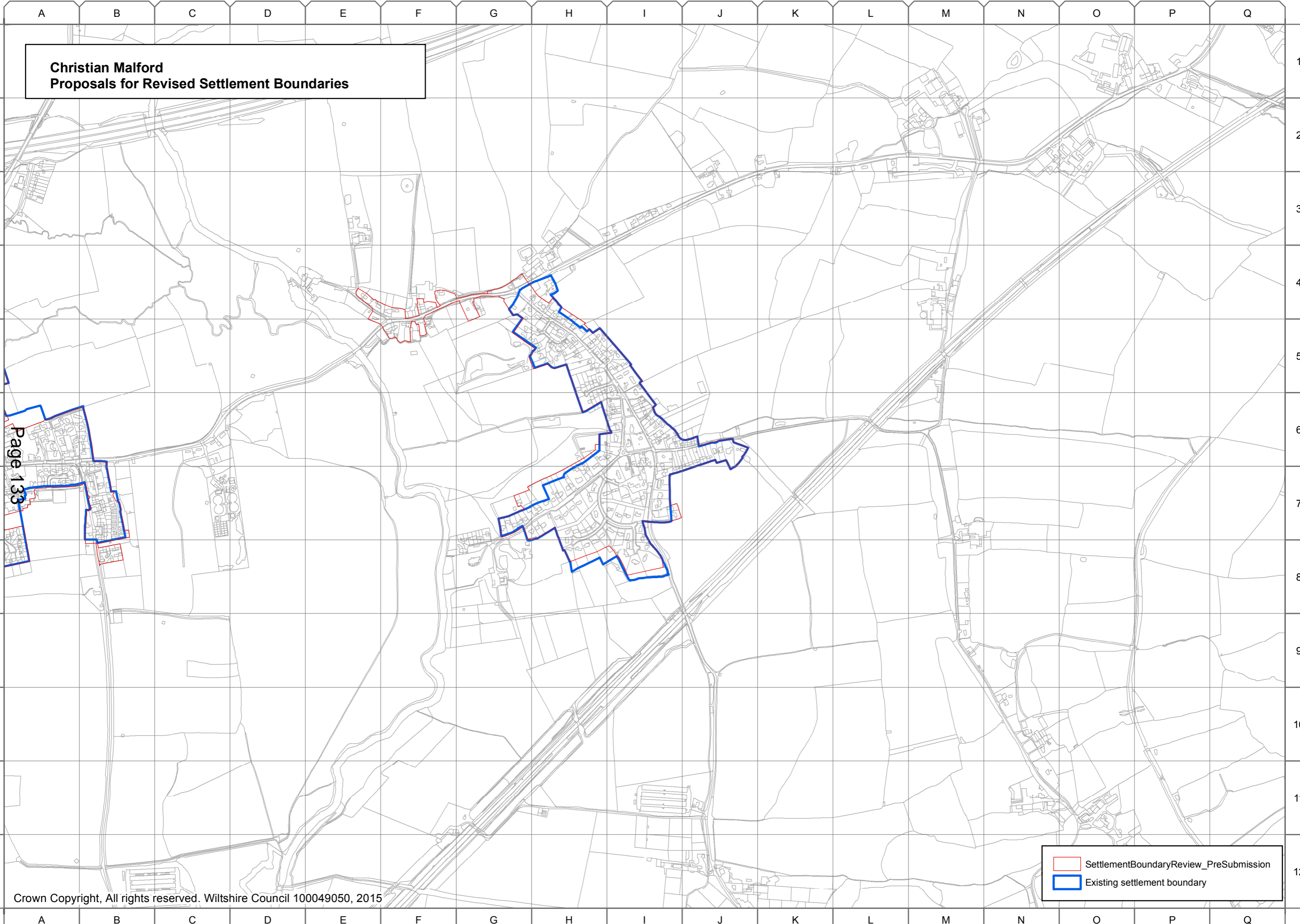


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**Christian Malford  
Proposals for Revised Settlement Boundaries**



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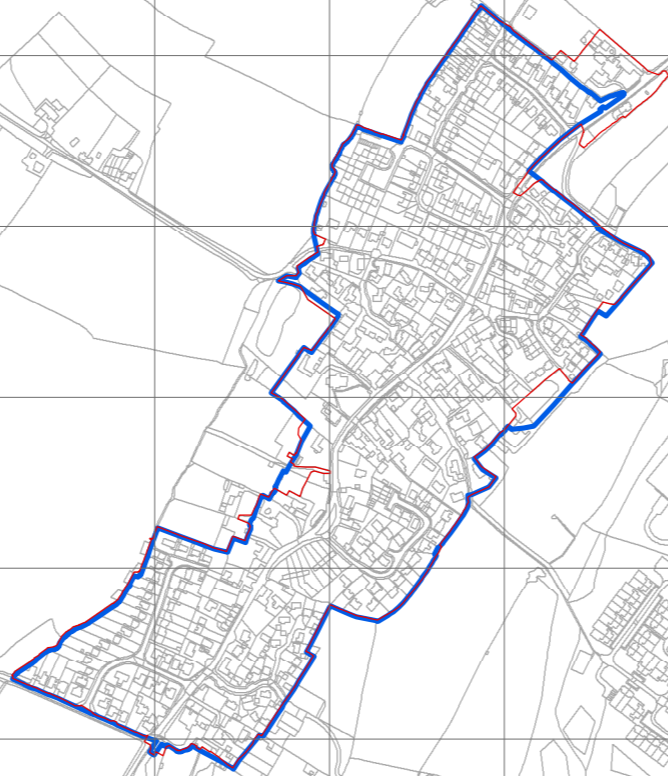
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**Hullavington  
Proposals for Revised Settlement Boundaries**

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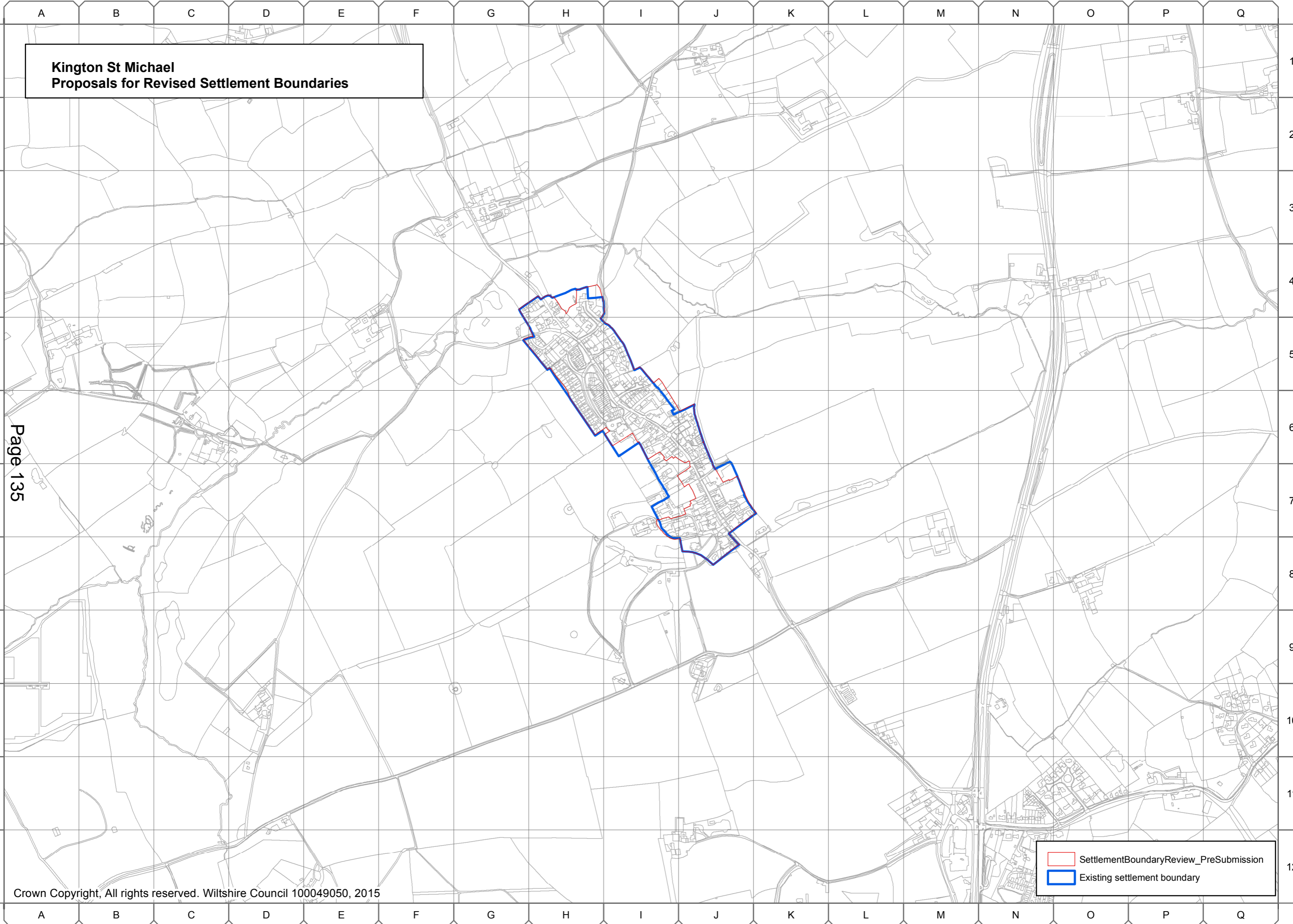
Page 134



	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary

A B C D E F G H I J K L M N O P Q

**Kington St Michael  
Proposals for Revised Settlement Boundaries**



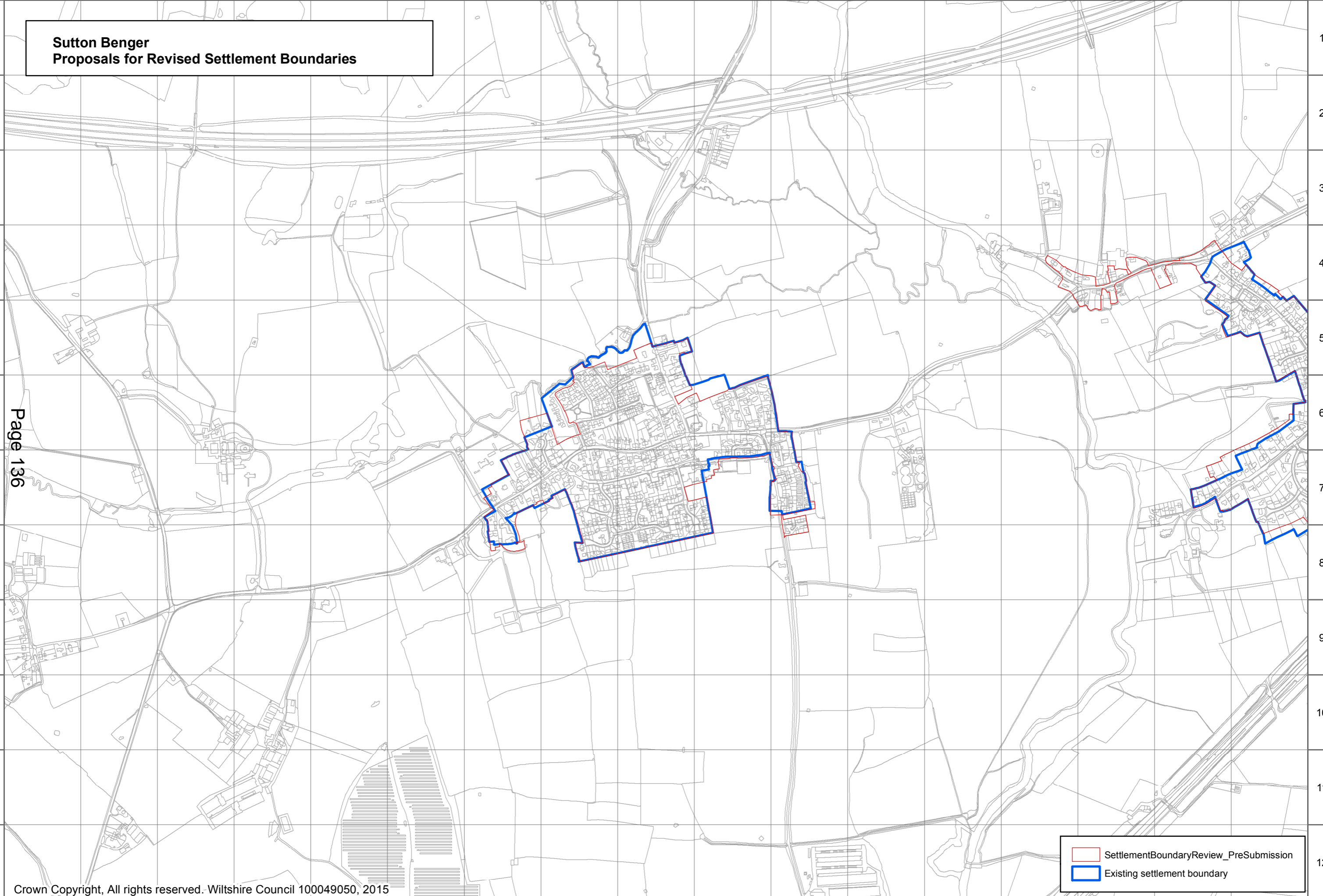
- SettlementBoundaryReview\_PreSubmission
- Existing settlement boundary



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**Sutton Benger  
Proposals for Revised Settlement Boundaries**



Page 136

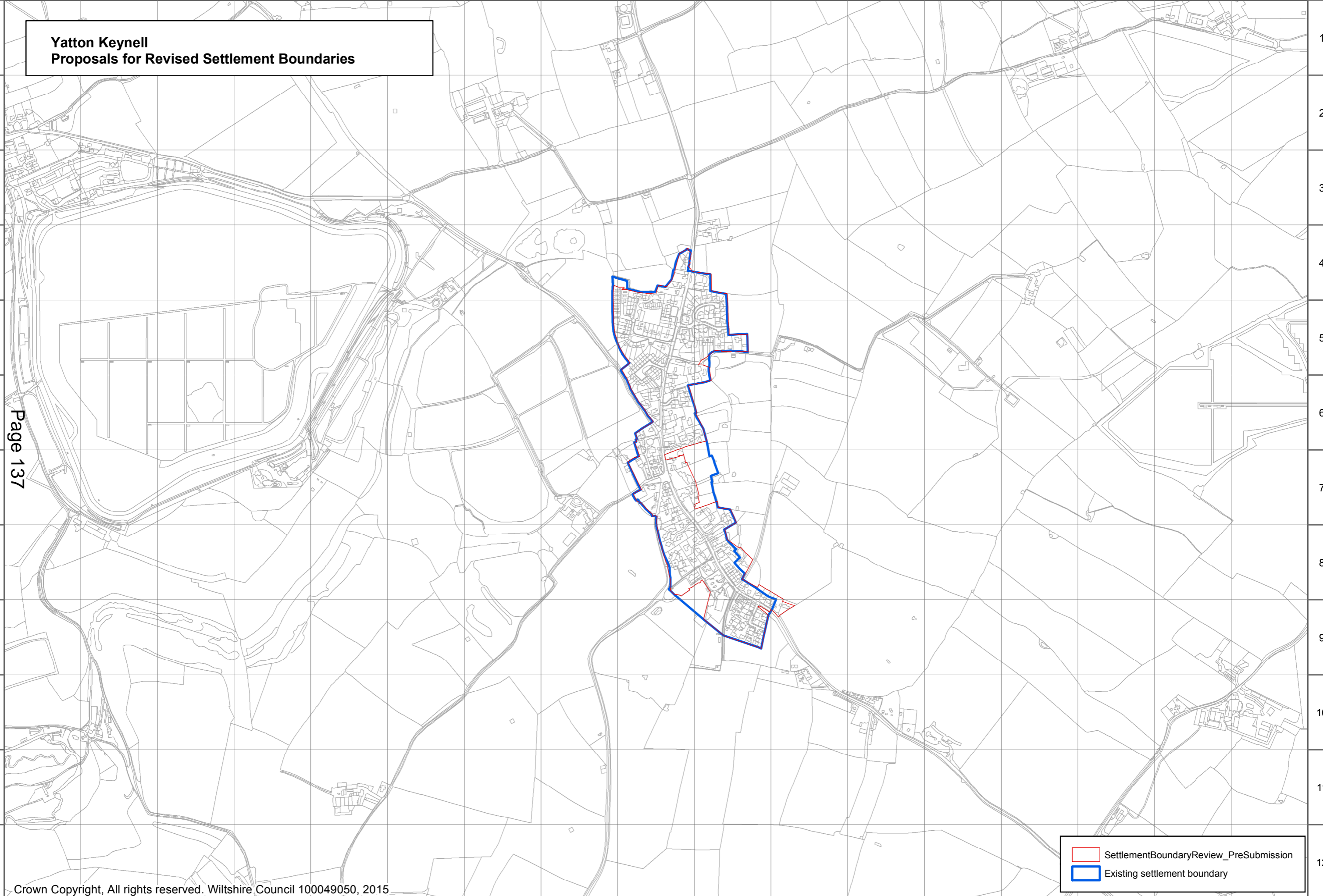
SettlementBoundaryReview\_PreSubmission  
Existing settlement boundary

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**Yatton Keynell  
Proposals for Revised Settlement Boundaries**



Page 137

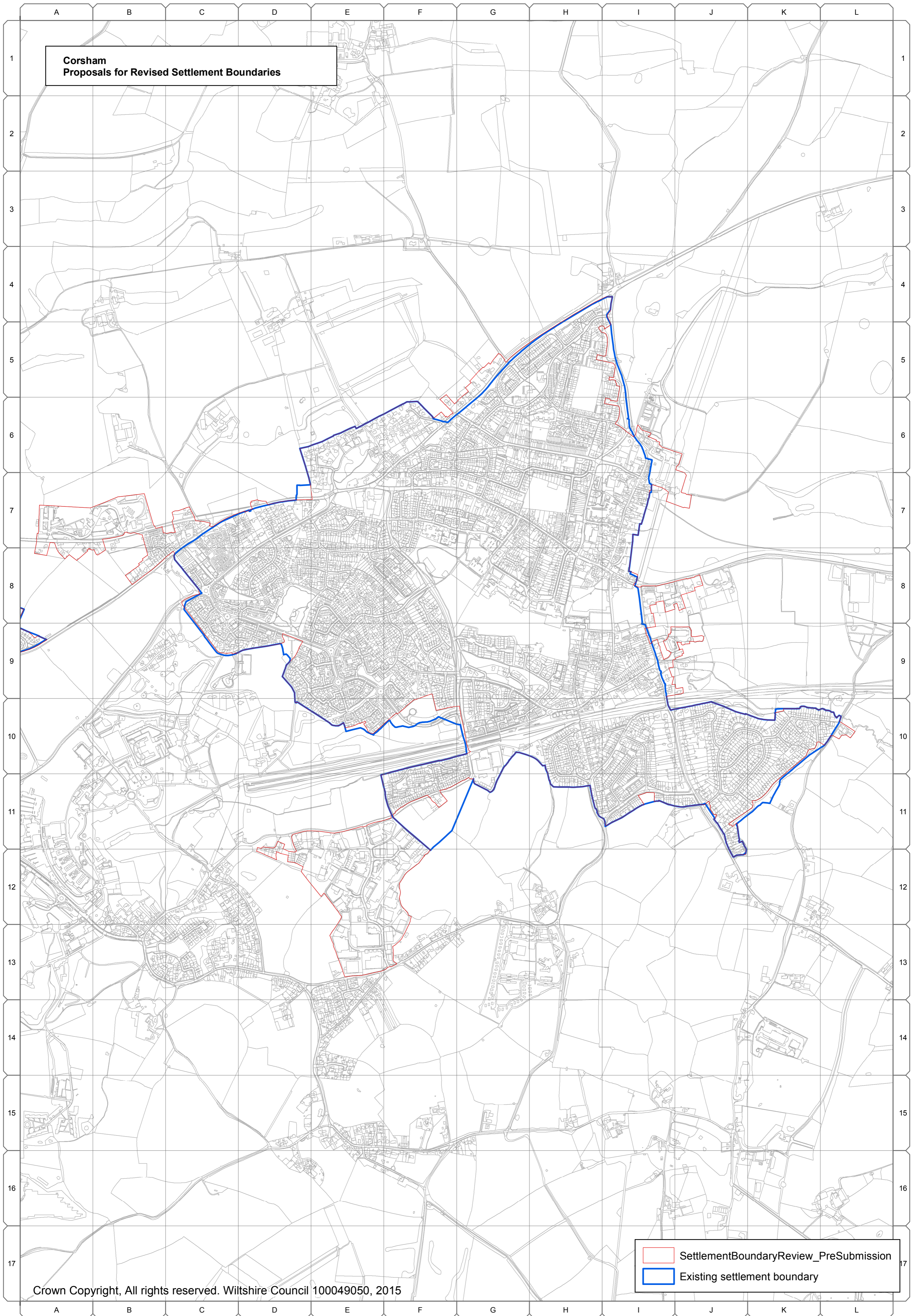
SettlementBoundaryReview\_PreSubmission  
Existing settlement boundary

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**Corsham  
Proposals for Revised Settlement Boundaries**

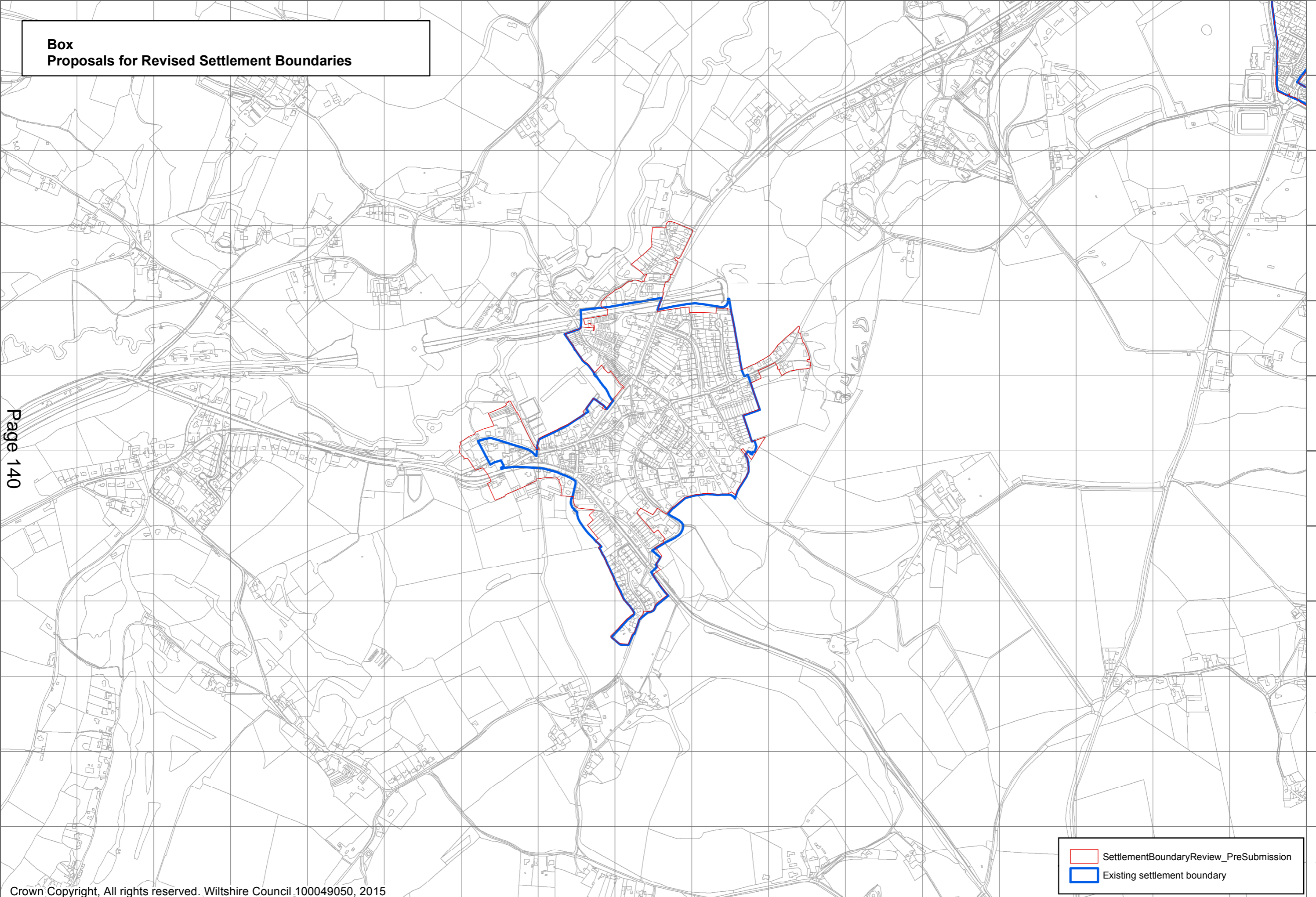
- SettlementBoundaryReview\_PreSubmission
- Existing settlement boundary



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**Box  
Proposals for Revised Settlement Boundaries**



Page 140

SettlementBoundaryReview\_PreSubmission  
Existing settlement boundary

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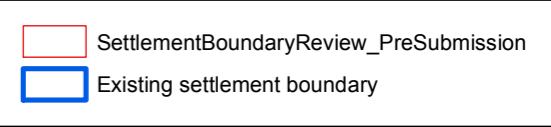
**Colerne  
Proposals for Revised Settlement Boundaries**

Page 141

- SettlementBoundaryReview\_PreSubmission
- Existing settlement boundary

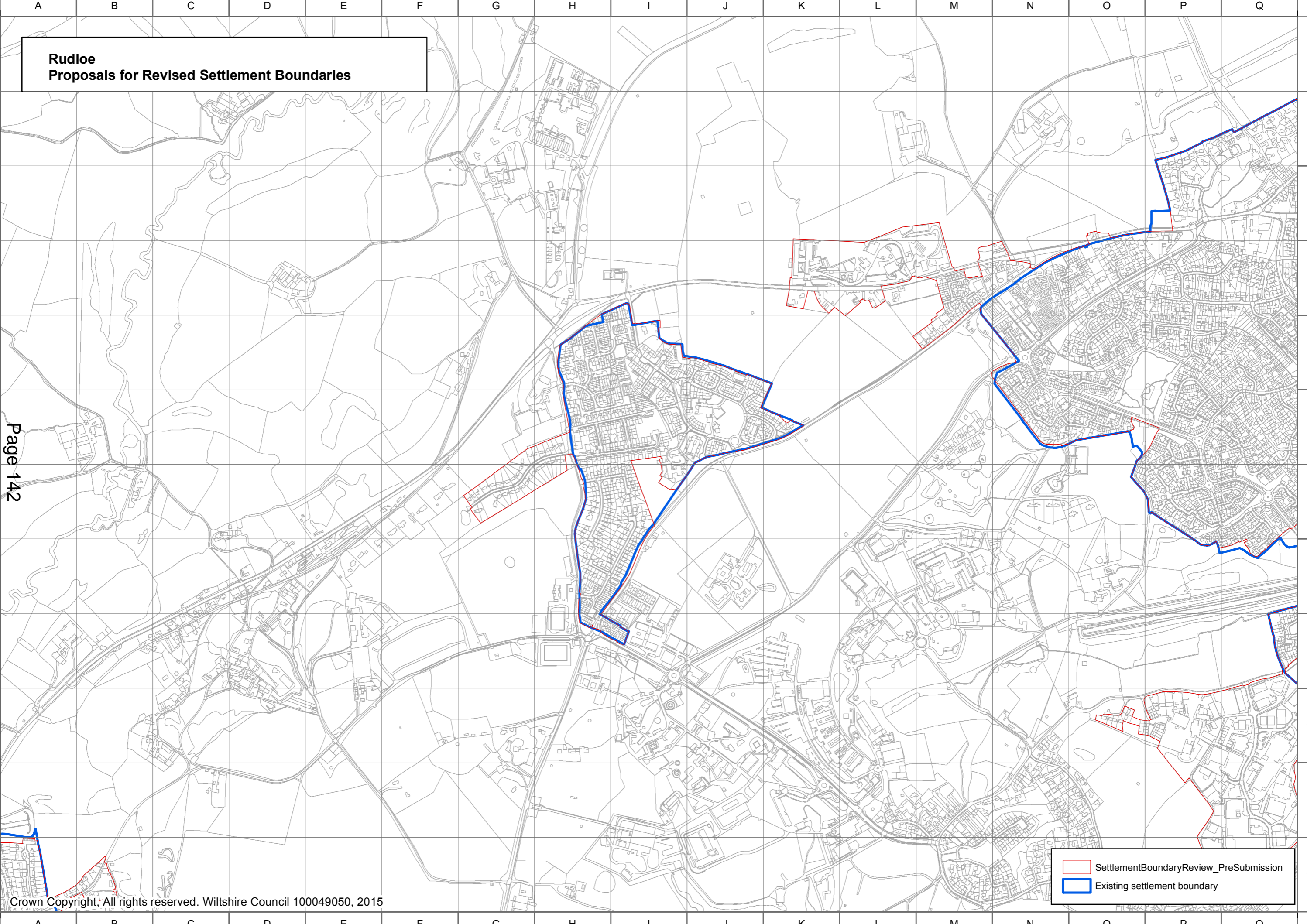


**Rudloe  
Proposals for Revised Settlement Boundaries**

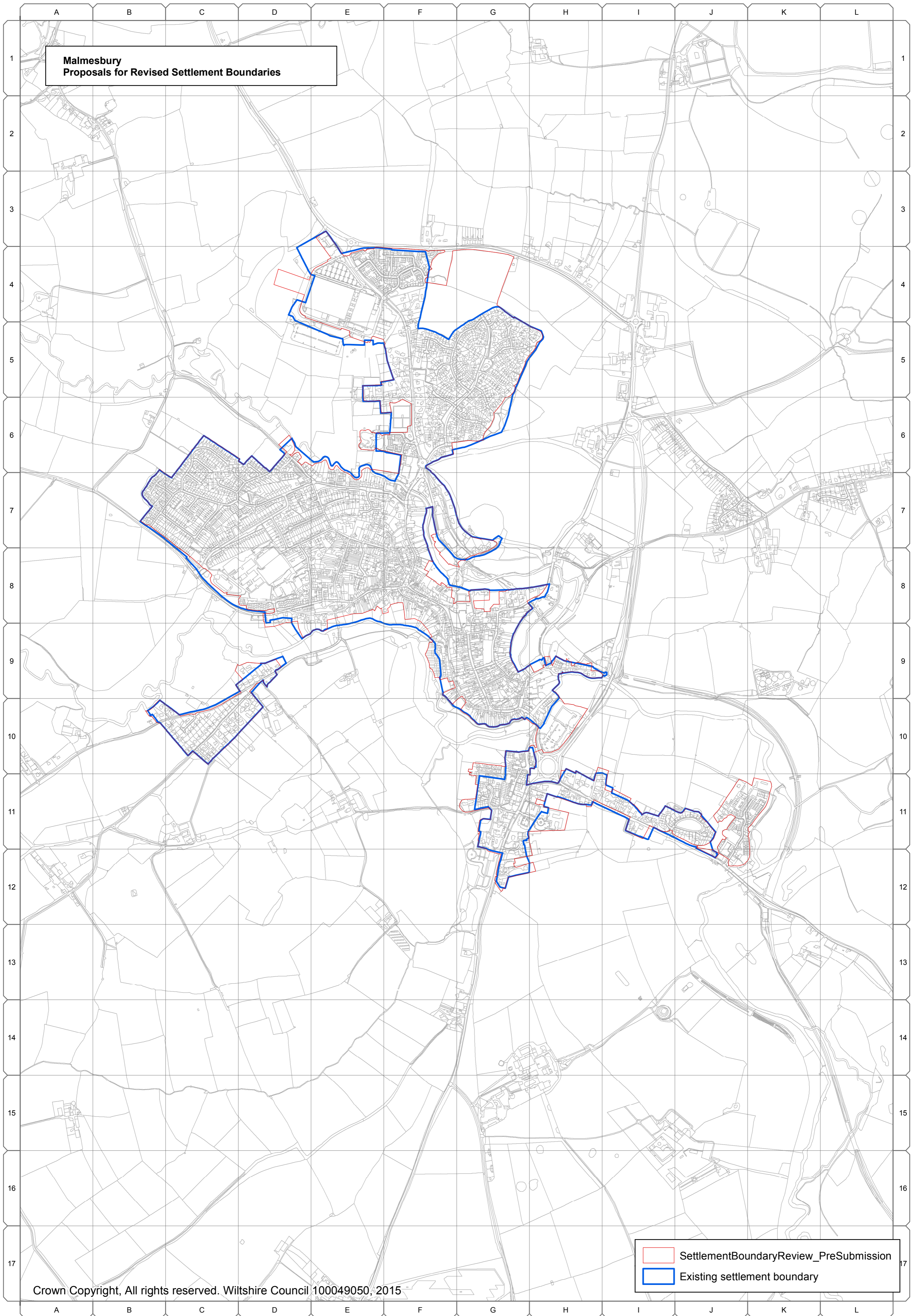


Legend for settlement boundaries:

- SettlementBoundaryReview\_PreSubmission (Red outline)
- Existing settlement boundary (Blue outline)







**Malmesbury  
Proposals for Revised Settlement Boundaries**



- SettlementBoundaryReview\_PreSubmission
- Existing settlement boundary



**Ashton Keynes  
Proposals for Revised Settlement Boundaries**

- SettlementBoundaryReview\_PreSubmission
- Existing settlement boundary

**Crudwell  
Proposals for Revised Settlement Boundaries**

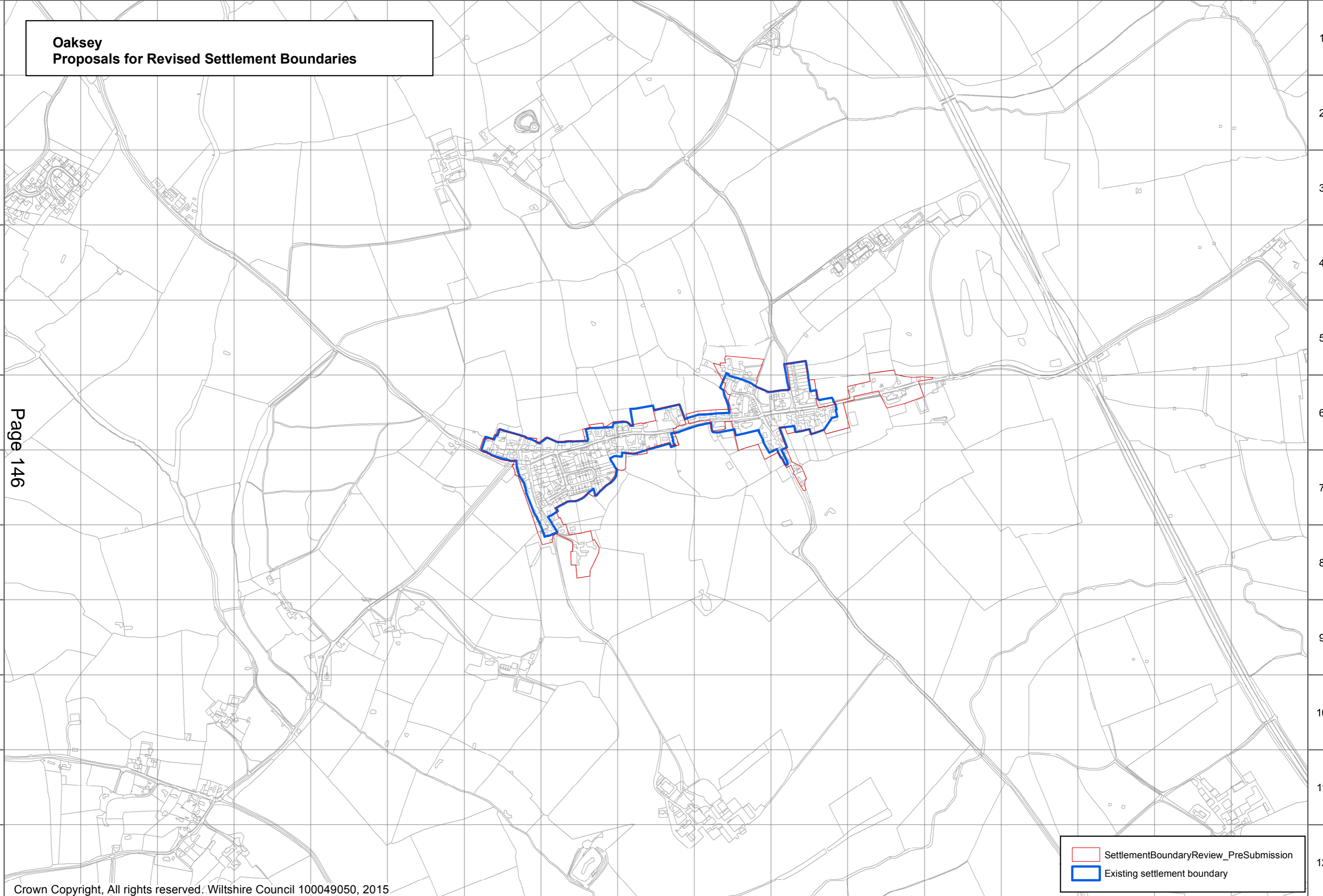
	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary



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**Oaksey  
Proposals for Revised Settlement Boundaries**



Page 146

SettlementBoundaryReview\_PreSubmission  
Existing settlement boundary

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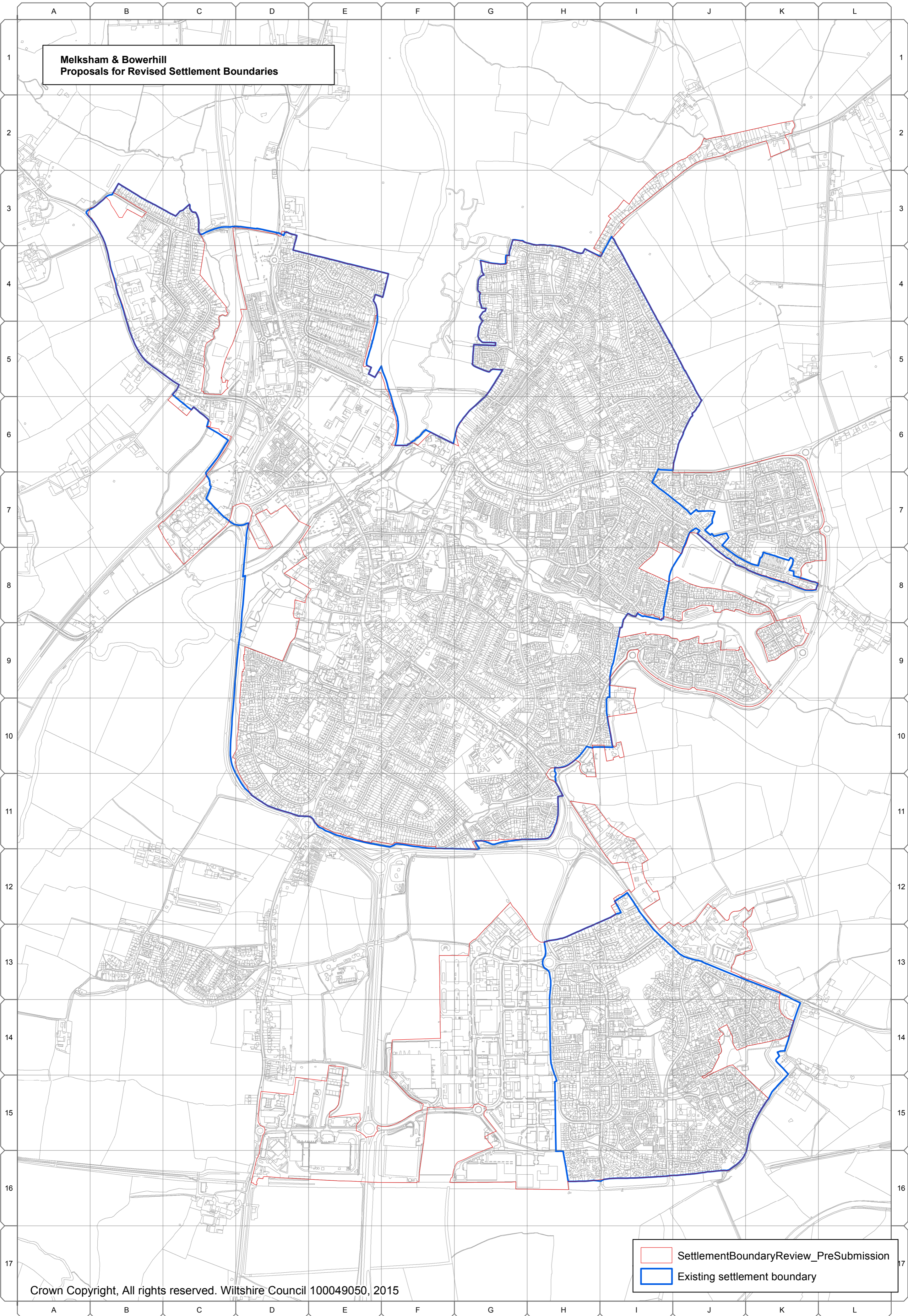
**Sherston  
Proposals for Revised Settlement Boundaries**

SettlementBoundaryReview\_PreSubmission  
Existing settlement boundary

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**Melksham & Bowerhill  
Proposals for Revised Settlement Boundaries**





SettlementBoundaryReview\_PreSubmission  
Existing settlement boundary



**Atworth  
Proposals for Revised Settlement Boundaries**



SettlementBoundaryReview\_PreSubmission  
Existing settlement boundary

**Seend  
Proposals for Revised Settlement Boundaries**

	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary



**Semington  
Proposals for Revised Settlement Boundaries**

	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary





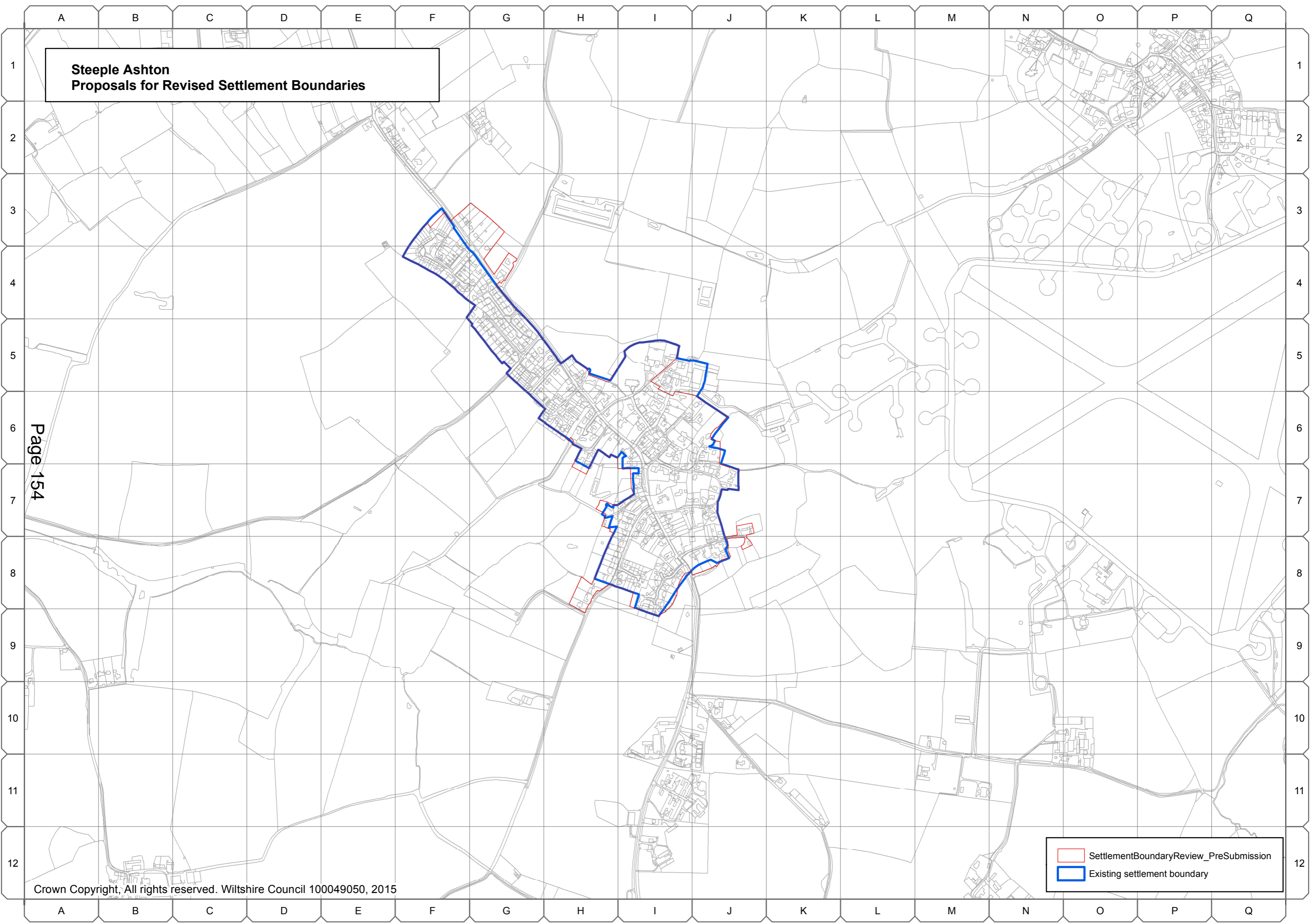
**Shaw & Whitley  
Proposals for Revised Settlement Boundaries**

Page 153

- SettlementBoundaryReview\_PreSubmission
- Existing settlement boundary

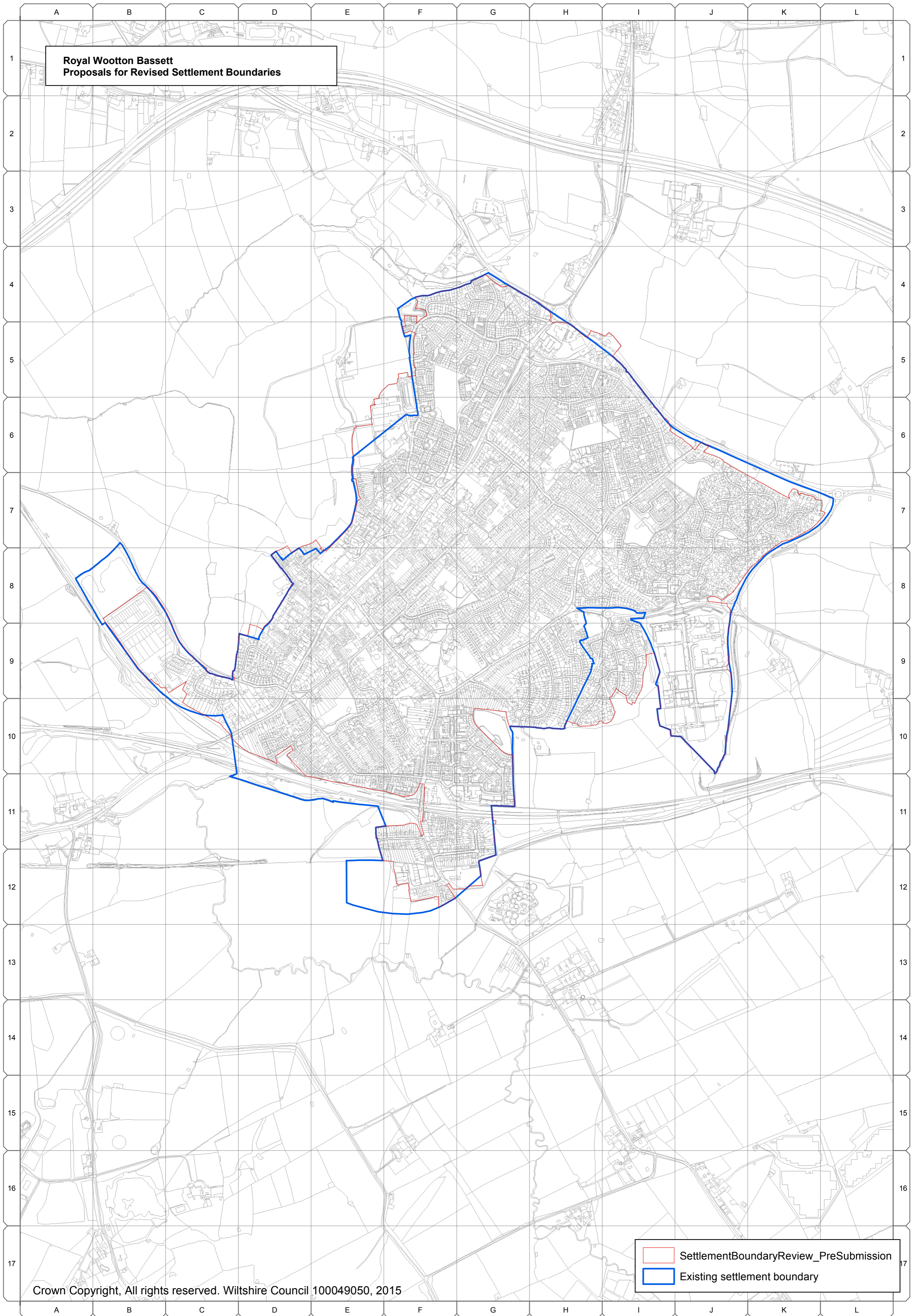
**Steeple Ashton  
Proposals for Revised Settlement Boundaries**

	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary





Royal Wootton Bassett  
Proposals for Revised Settlement Boundaries



SettlementBoundaryReview\_PreSubmission  
Existing settlement boundary





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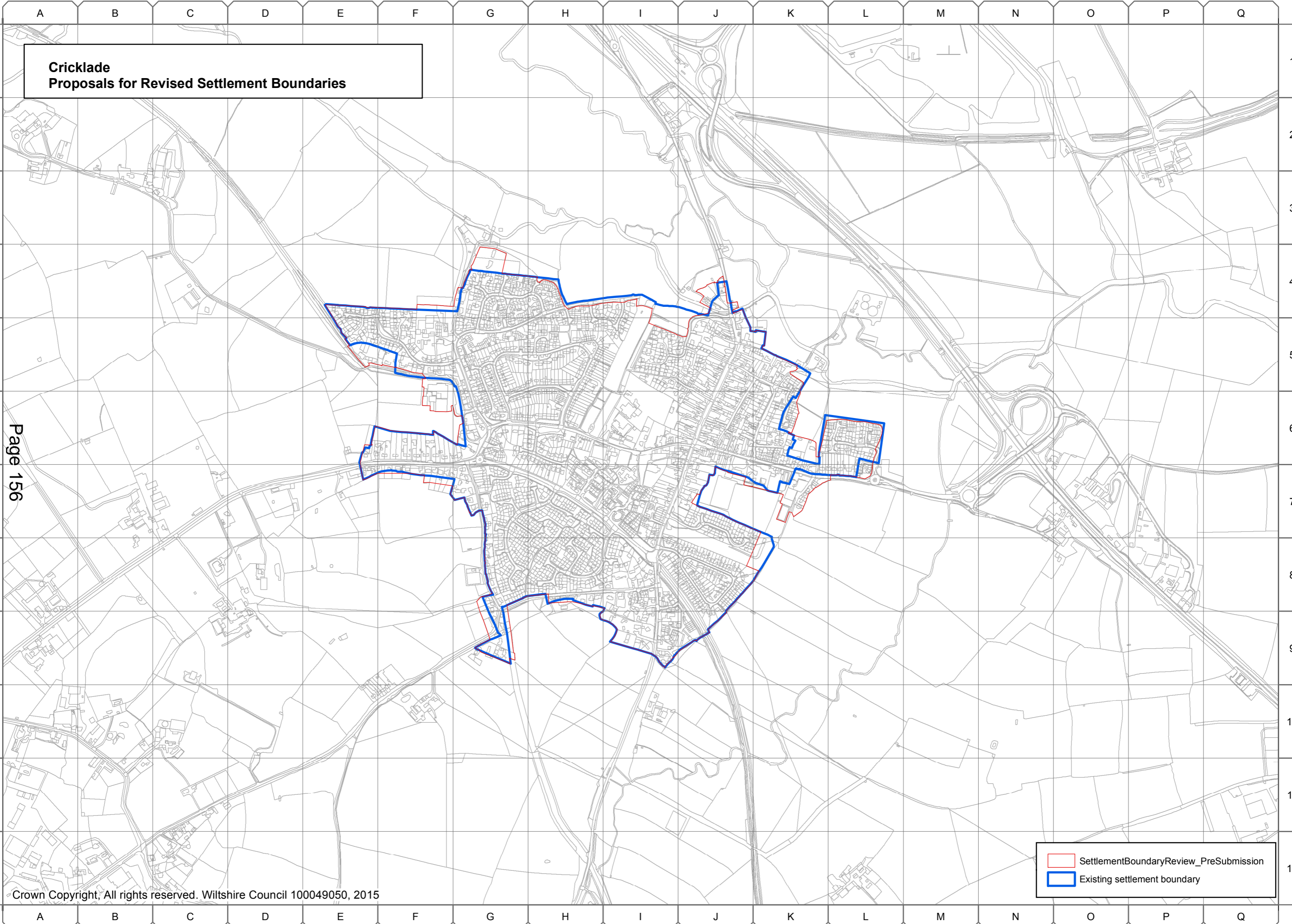
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**Cricklade  
Proposals for Revised Settlement Boundaries**

Page 156

	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary



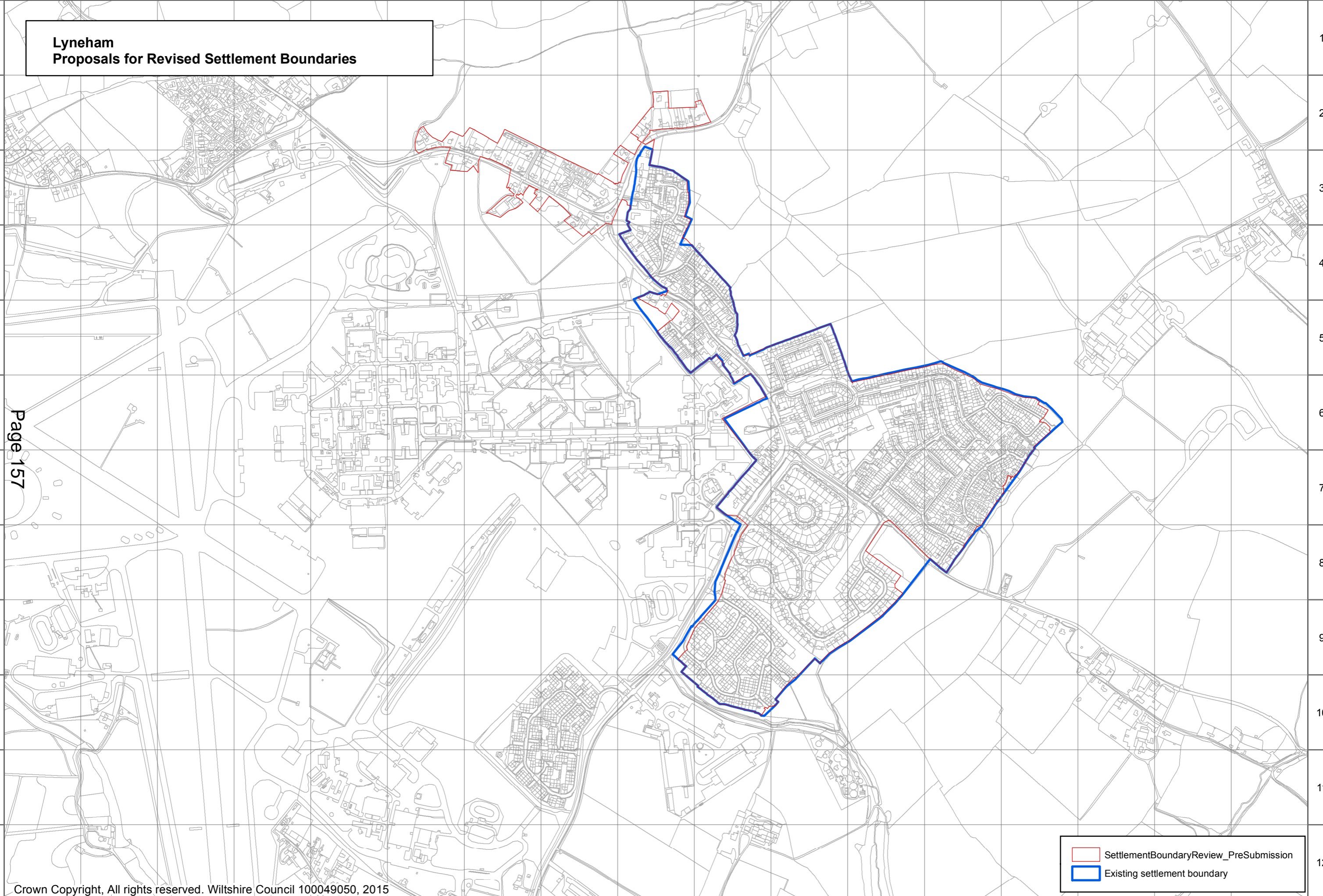


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**Lyneham  
Proposals for Revised Settlement Boundaries**

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Page 157

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	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary



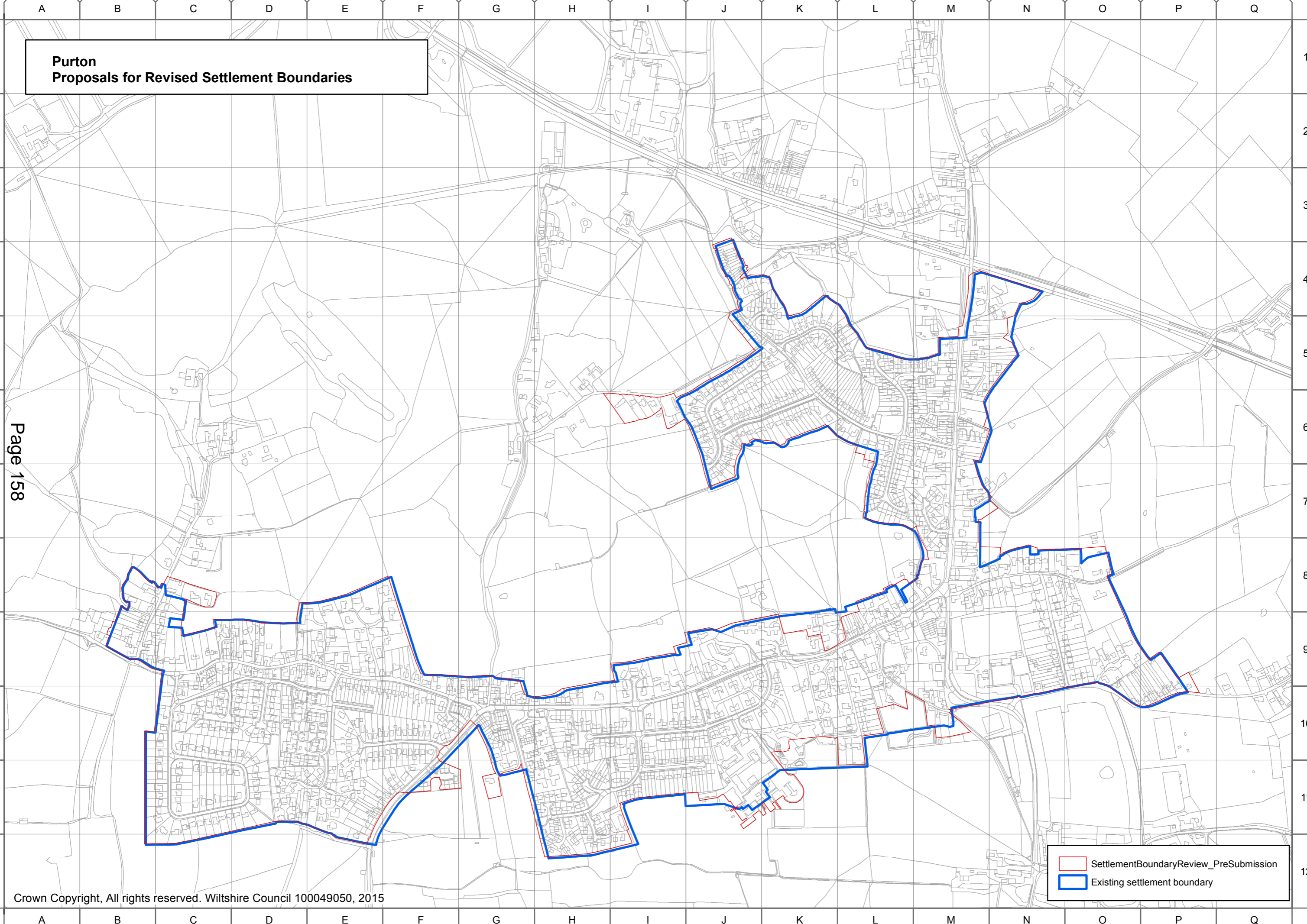
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**Purton  
Proposals for Revised Settlement Boundaries**

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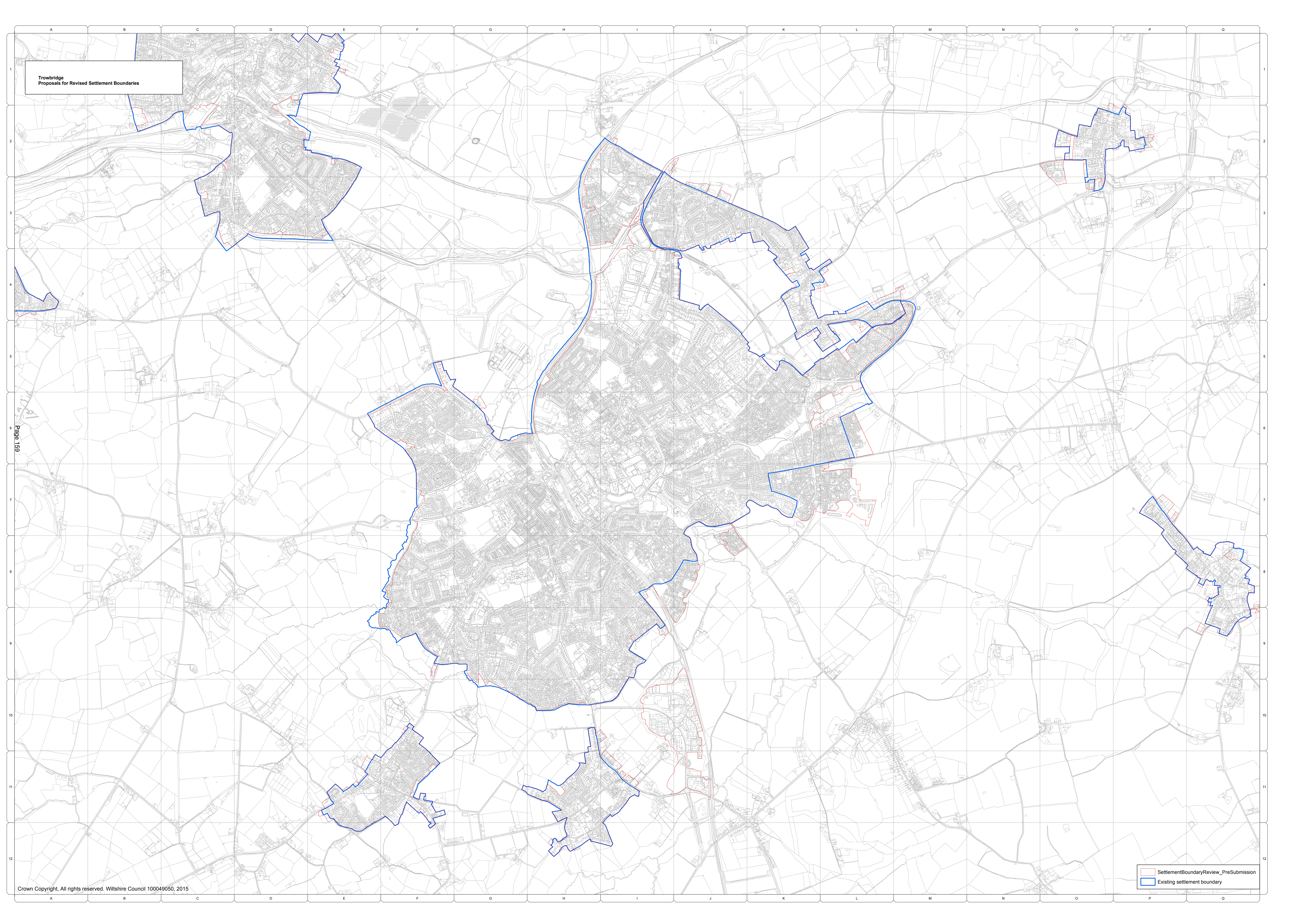
	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary

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Trowbridge  
Proposals for Revised Settlement Boundaries

SettlementBoundaryReview\_PreSubmission  
Existing settlement boundary





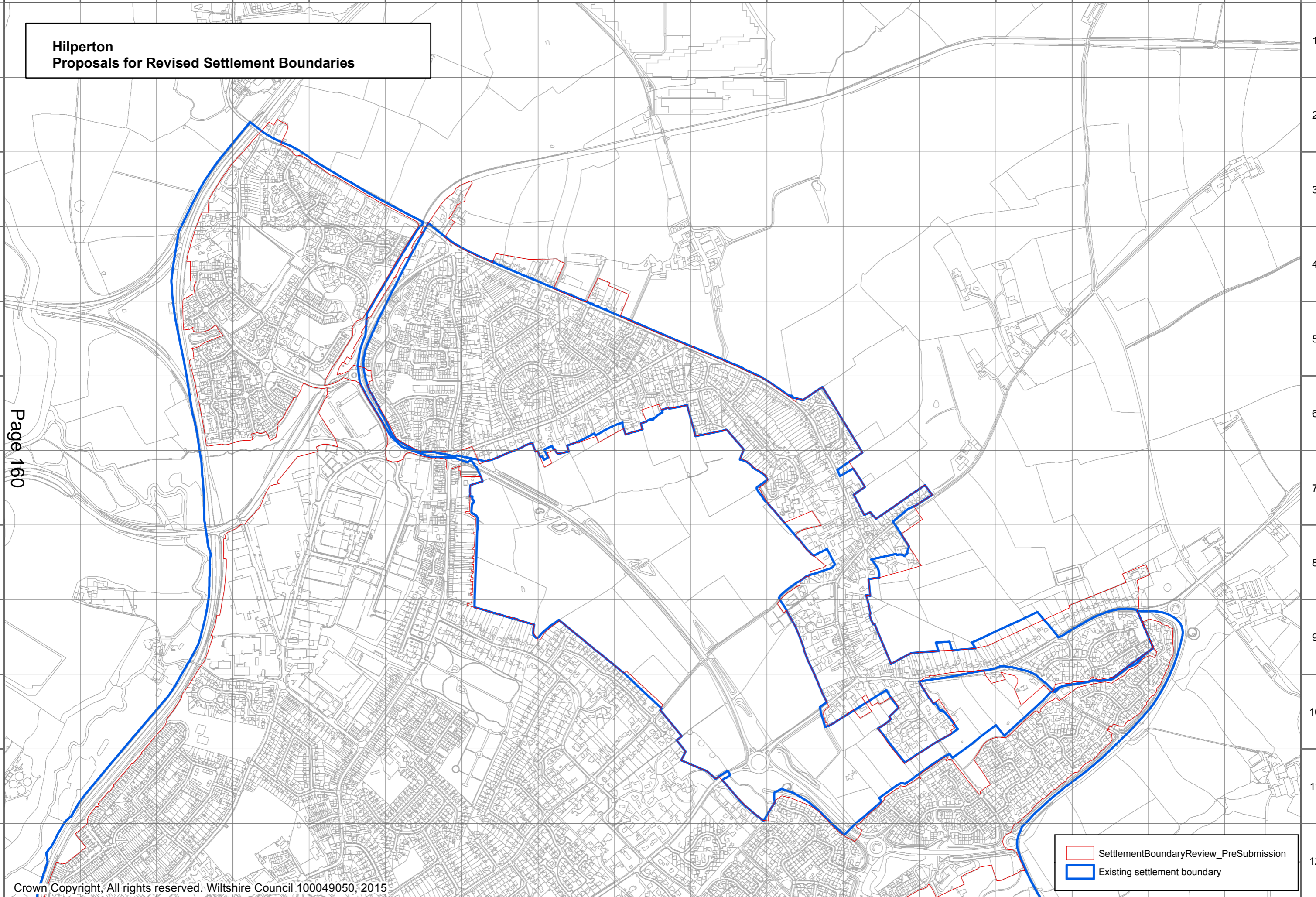
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**Hilperton  
Proposals for Revised Settlement Boundaries**

Page 160

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	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary

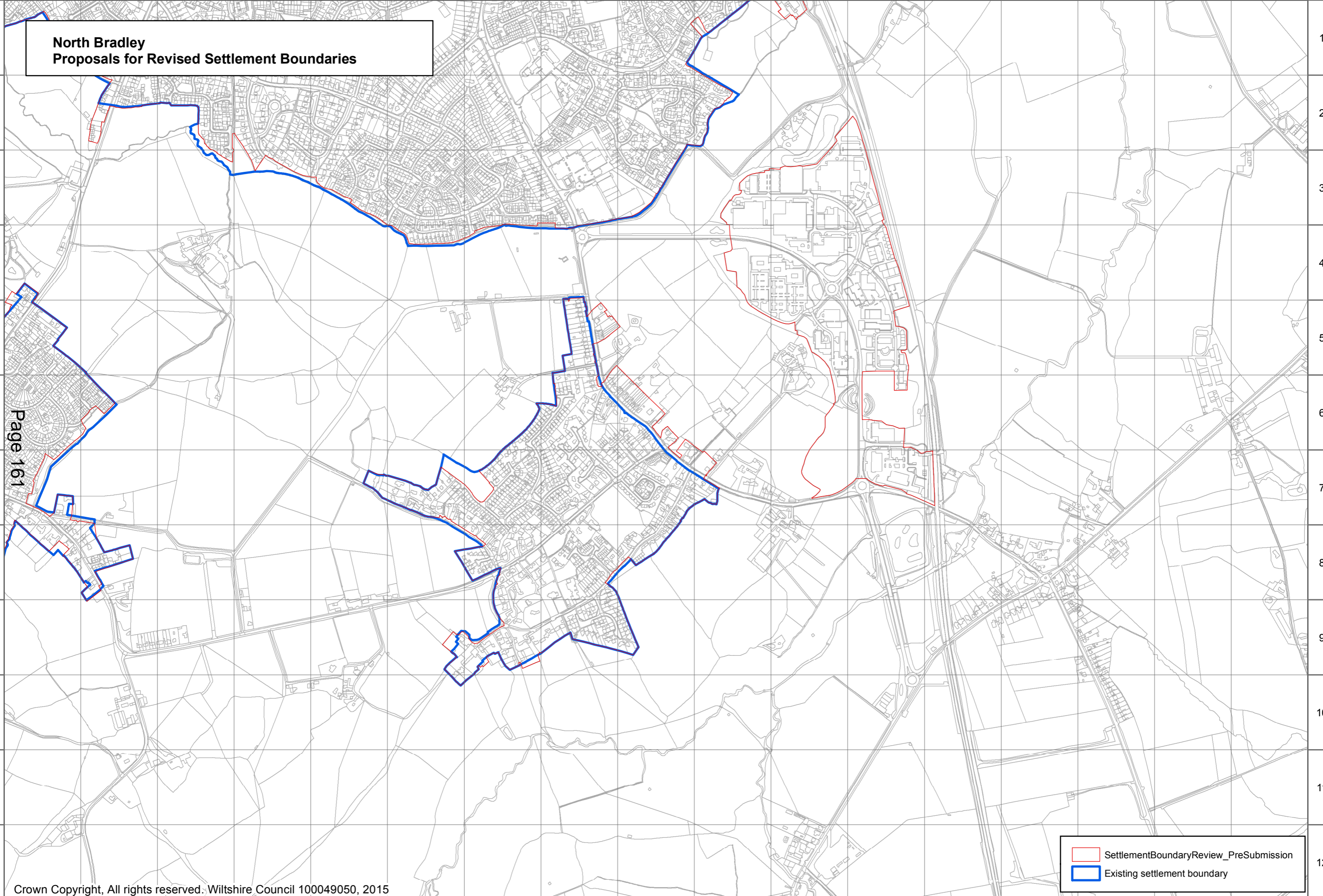


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**North Bradley  
Proposals for Revised Settlement Boundaries**





Page 161

SettlementBoundaryReview\_PreSubmission  
Existing settlement boundary

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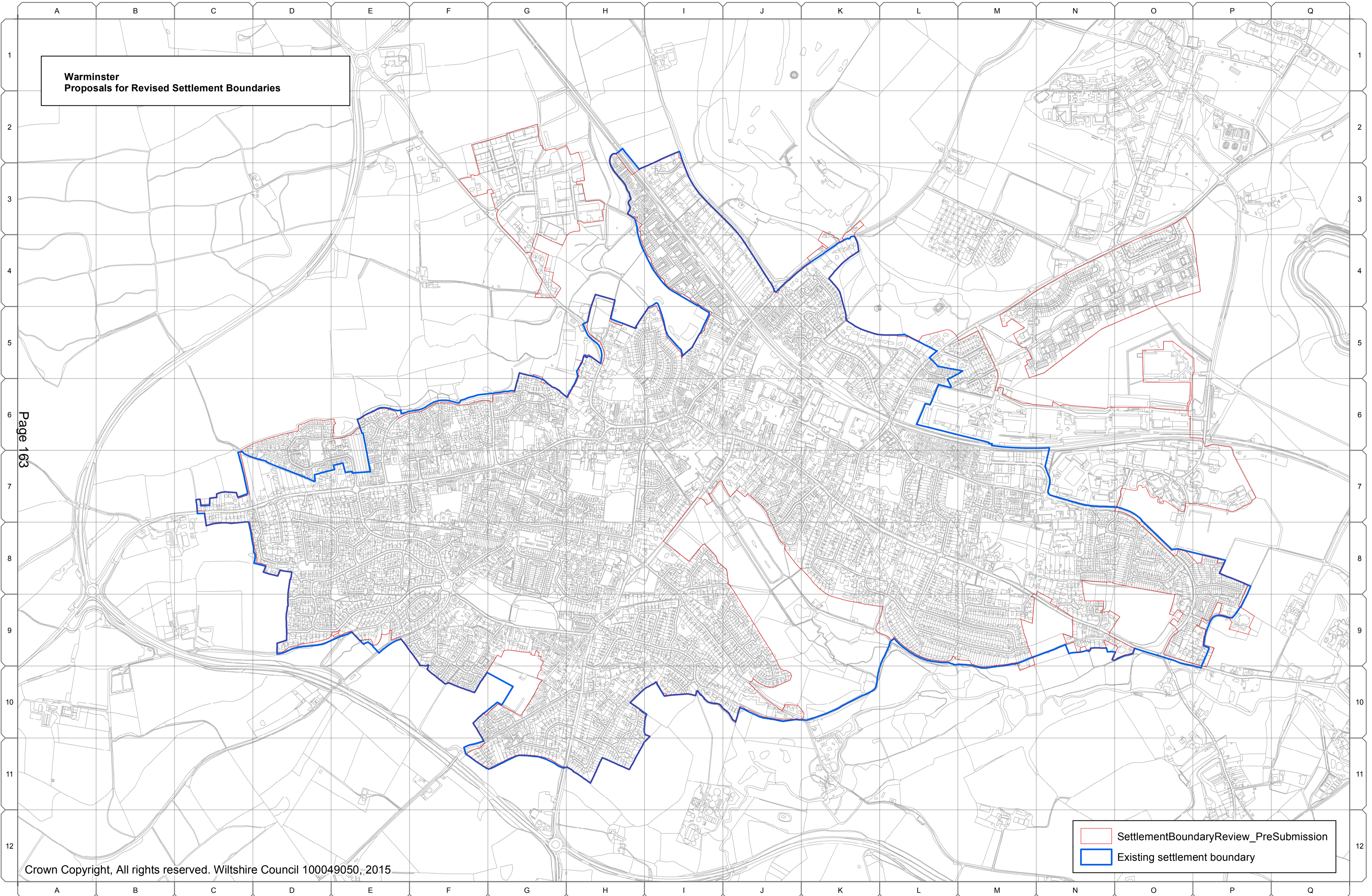




**Southwick  
Proposals for Revised Settlement Boundaries**

	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary



**Warminster  
Proposals for Revised Settlement Boundaries**



	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary





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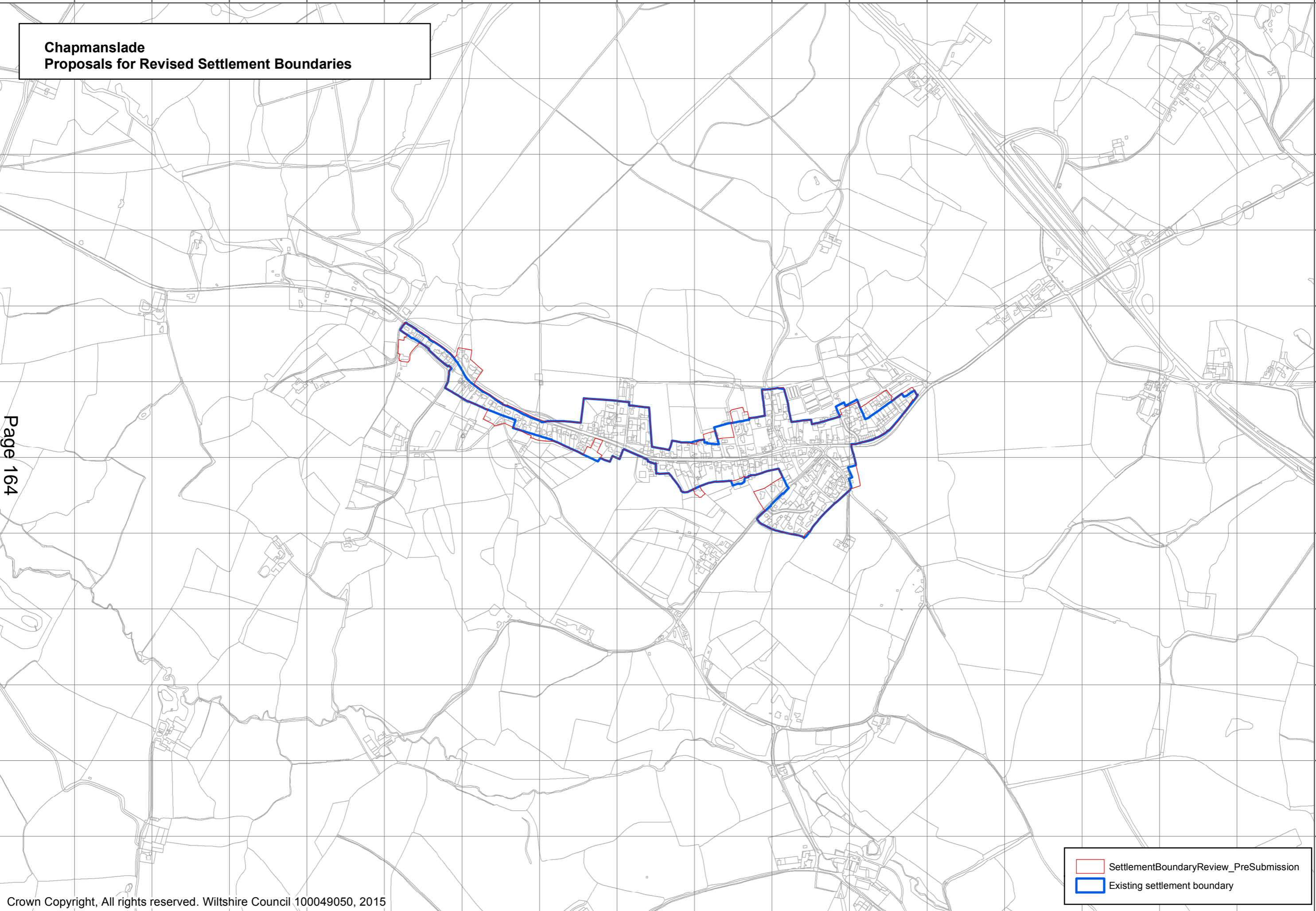
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**Chapmanslade  
Proposals for Revised Settlement Boundaries**

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Page 164

	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary





**Codford  
Proposals for Revised Settlement Boundaries**

SettlementBoundaryReview\_PreSubmission  
Existing settlement boundary

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**Corsley  
Proposals for Revised Settlement Boundaries**

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Page 166



	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary

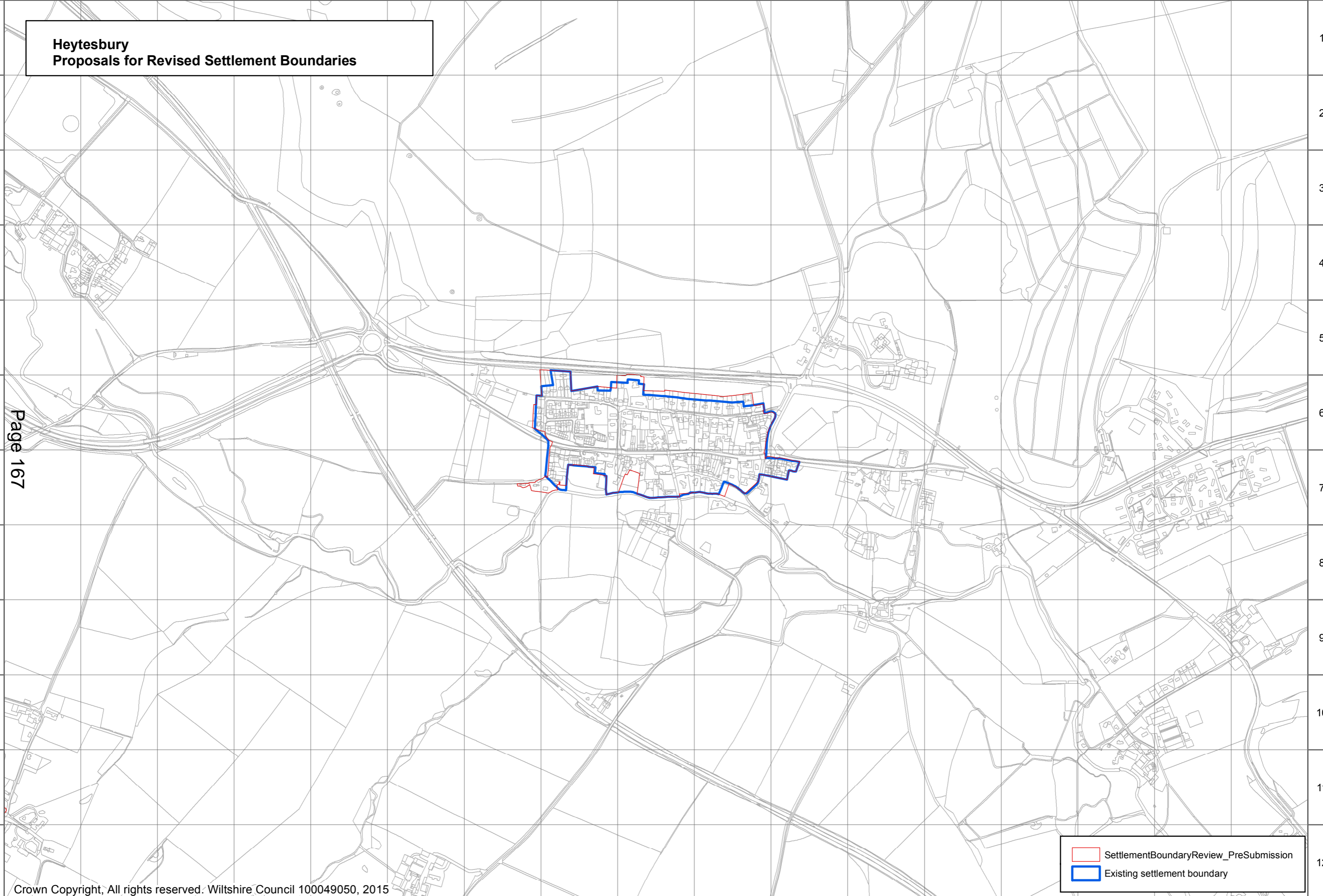
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**Heytesbury  
Proposals for Revised Settlement Boundaries**



Page 167



SettlementBoundaryReview\_PreSubmission  
Existing settlement boundary

A B C D E F G H I J K L M N O P Q

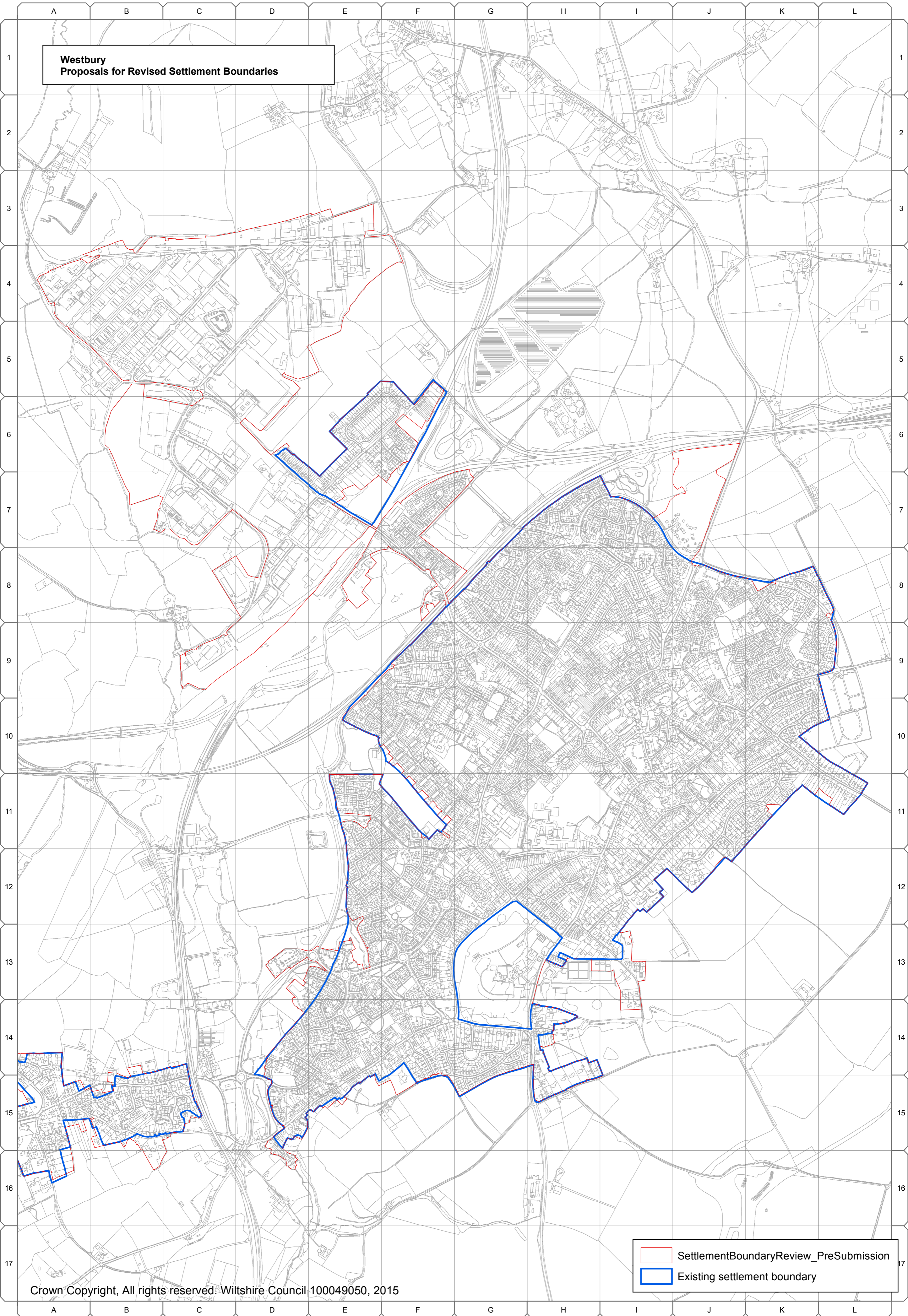


**Sutton Veny  
Proposals for Revised Settlement Boundaries**

Page 168

	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary





**Westbury  
Proposals for Revised Settlement Boundaries**

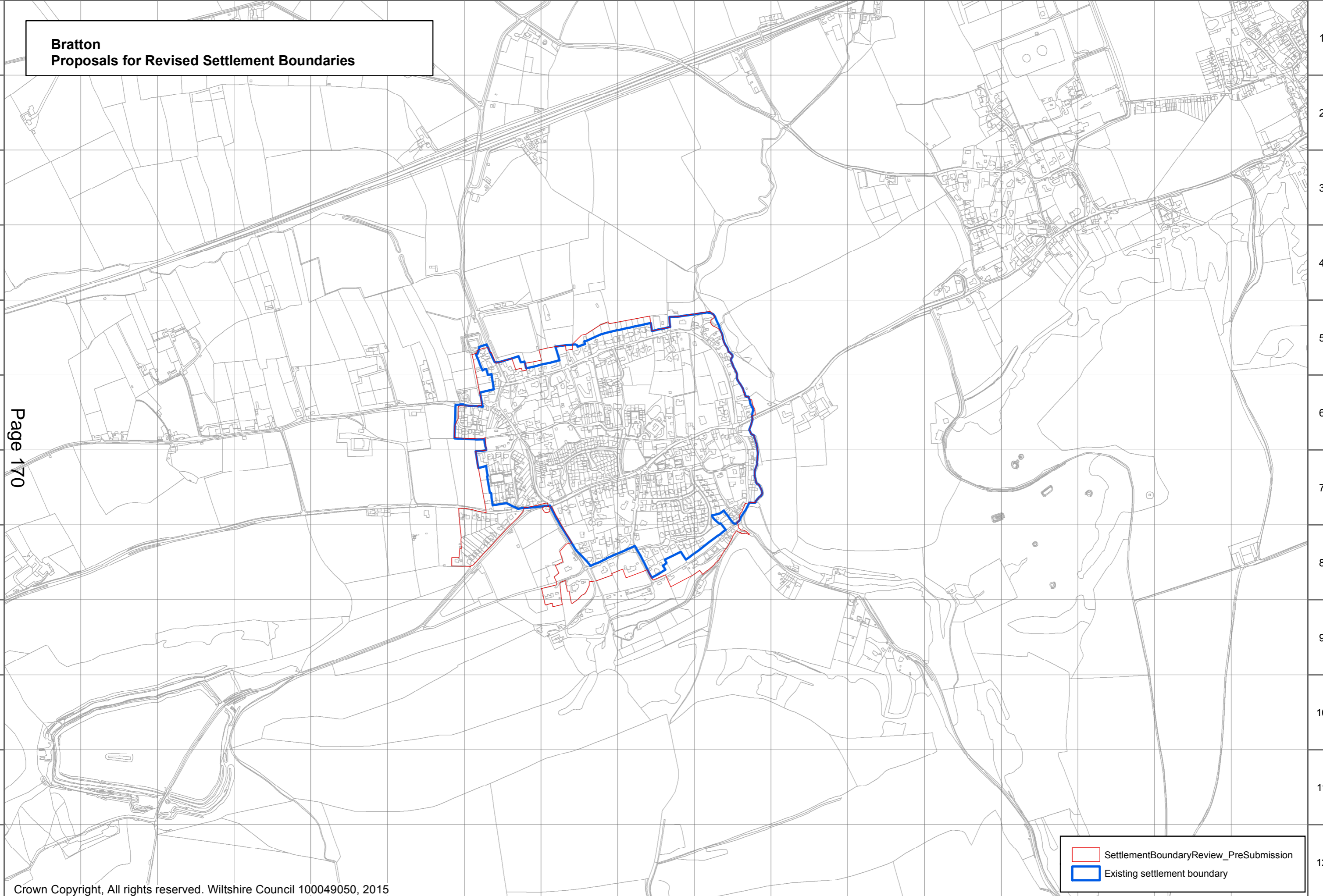
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- Existing settlement boundary



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**Bratton  
Proposals for Revised Settlement Boundaries**



Page 170

SettlementBoundaryReview\_PreSubmission  
Existing settlement boundary

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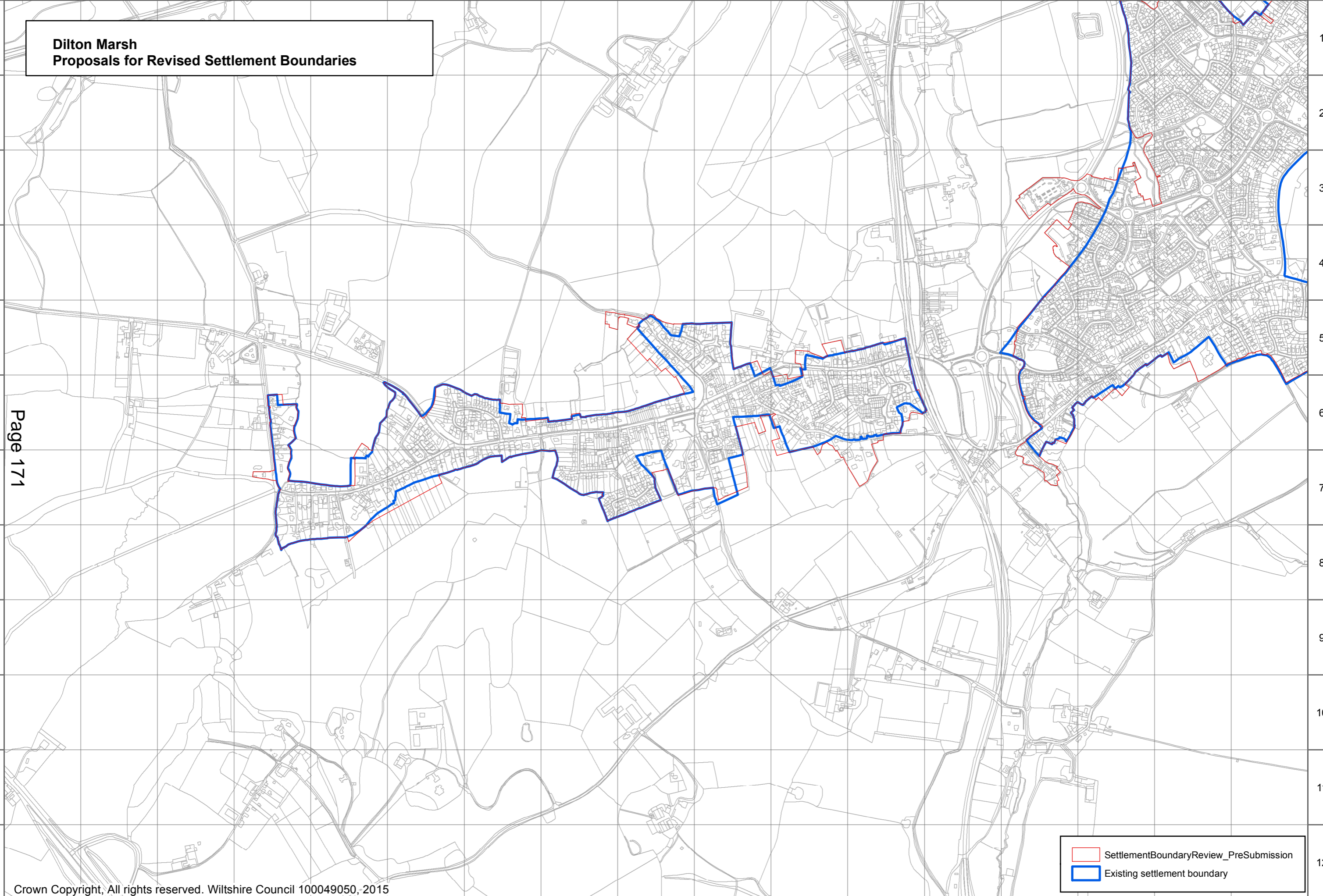
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**Dilton Marsh  
Proposals for Revised Settlement Boundaries**

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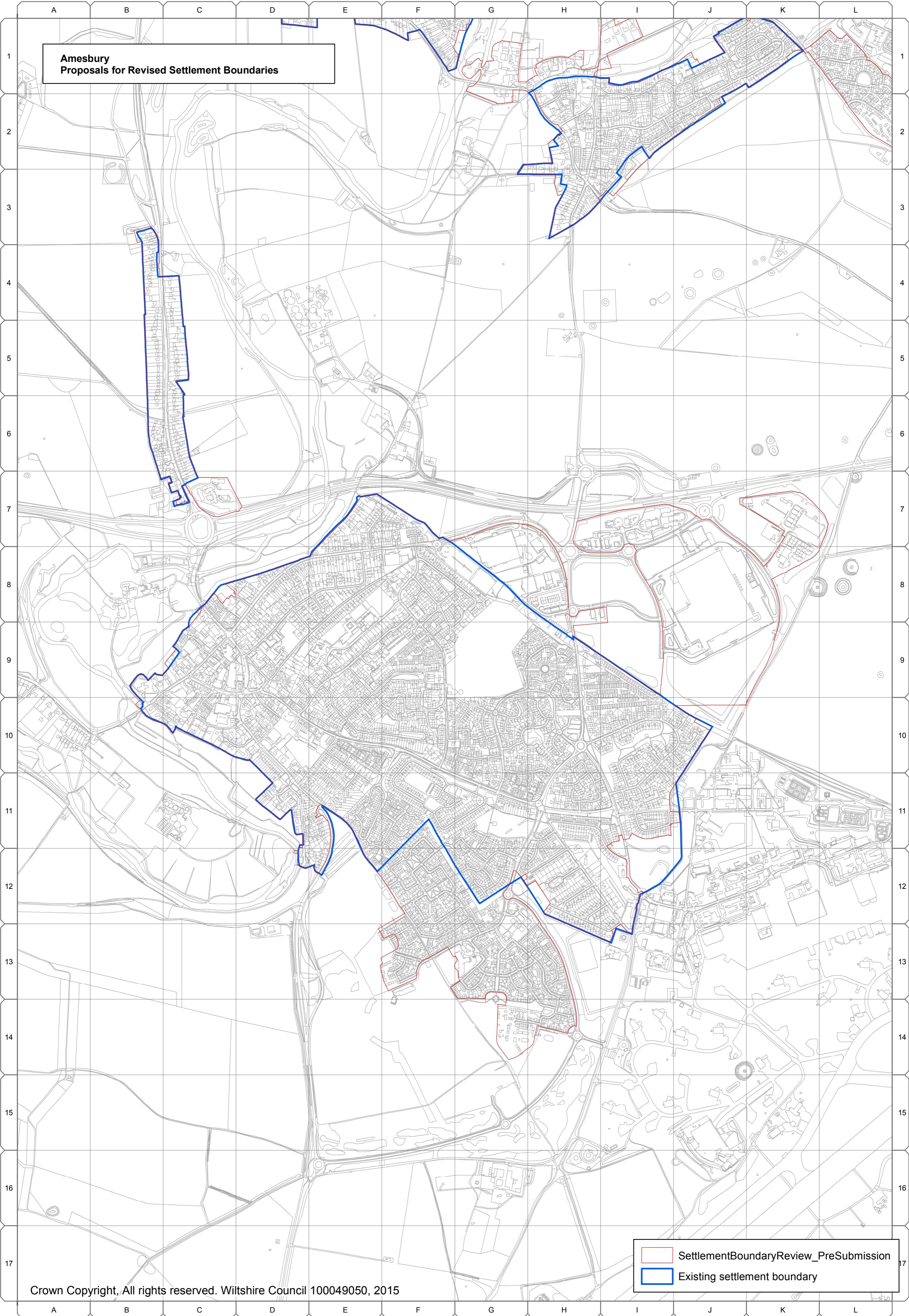
	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary

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**Amesbury  
Proposals for Revised Settlement Boundaries**



SettlementBoundaryReview\_PreSubmission  
Existing settlement boundary





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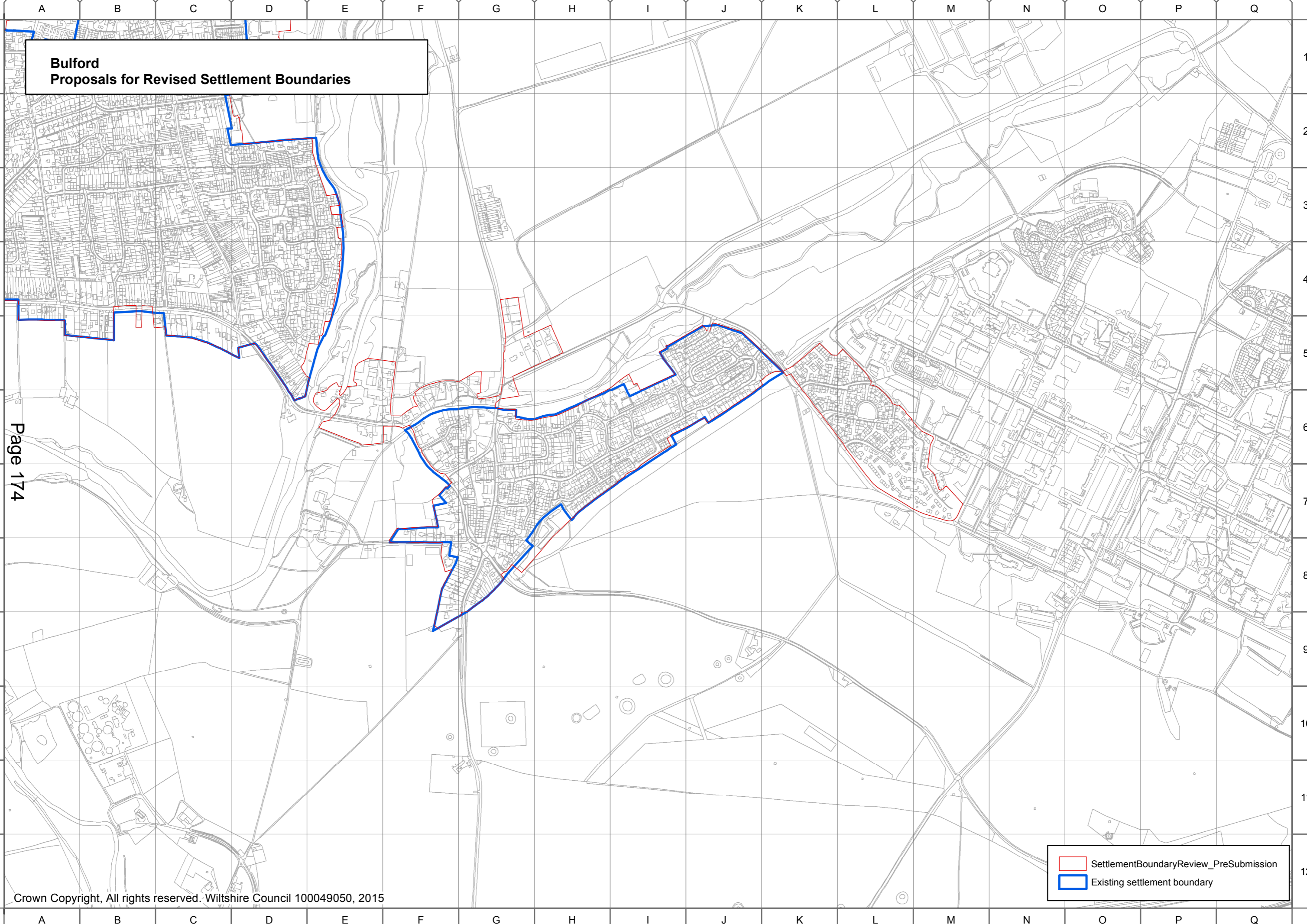
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**Bulford  
Proposals for Revised Settlement Boundaries**

Page 174

	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary



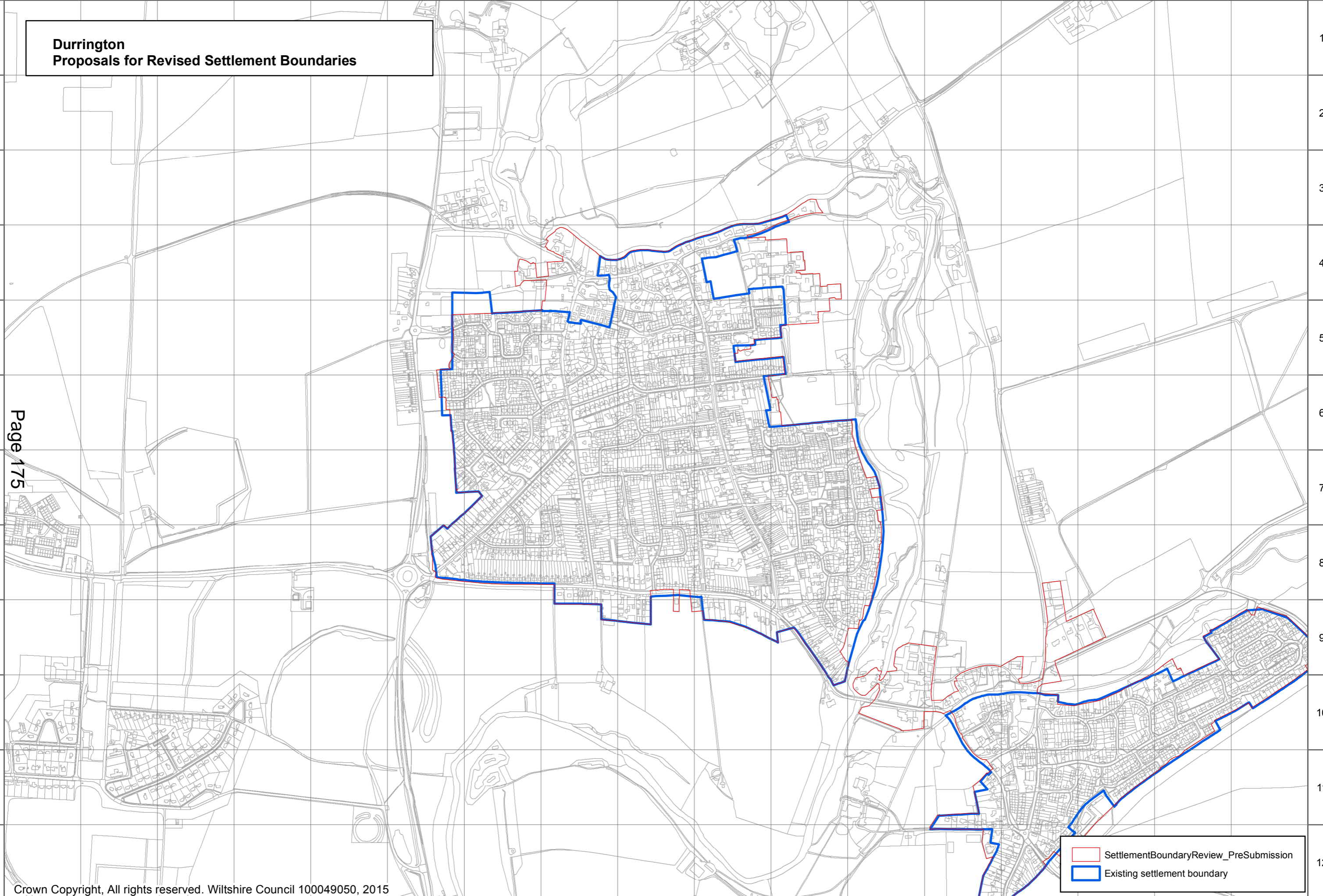


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**Durrington  
Proposals for Revised Settlement Boundaries**

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Page 175

A B C D E F G H I J K L M N O P Q





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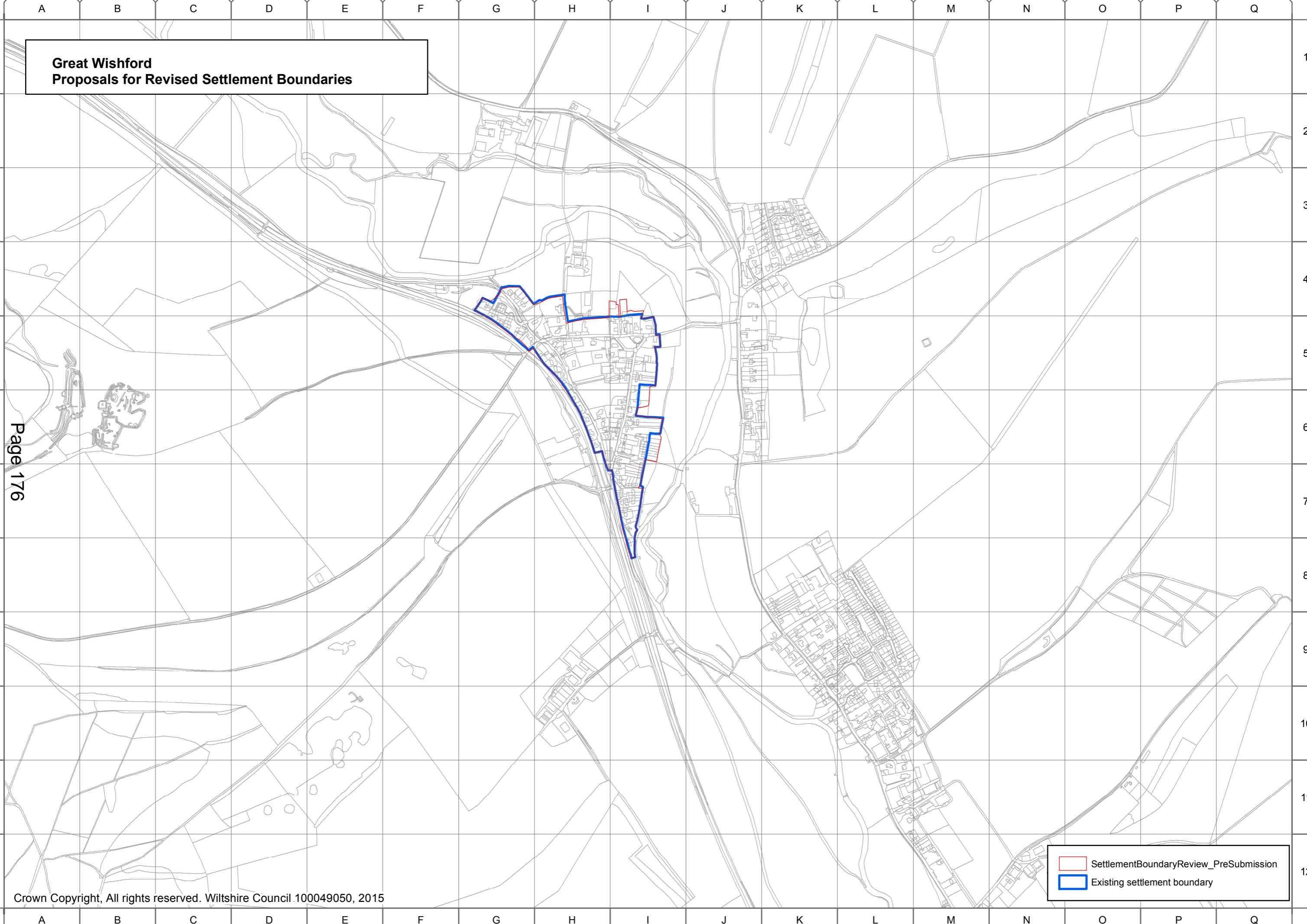
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**Great Wishford  
Proposals for Revised Settlement Boundaries**

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Page 176

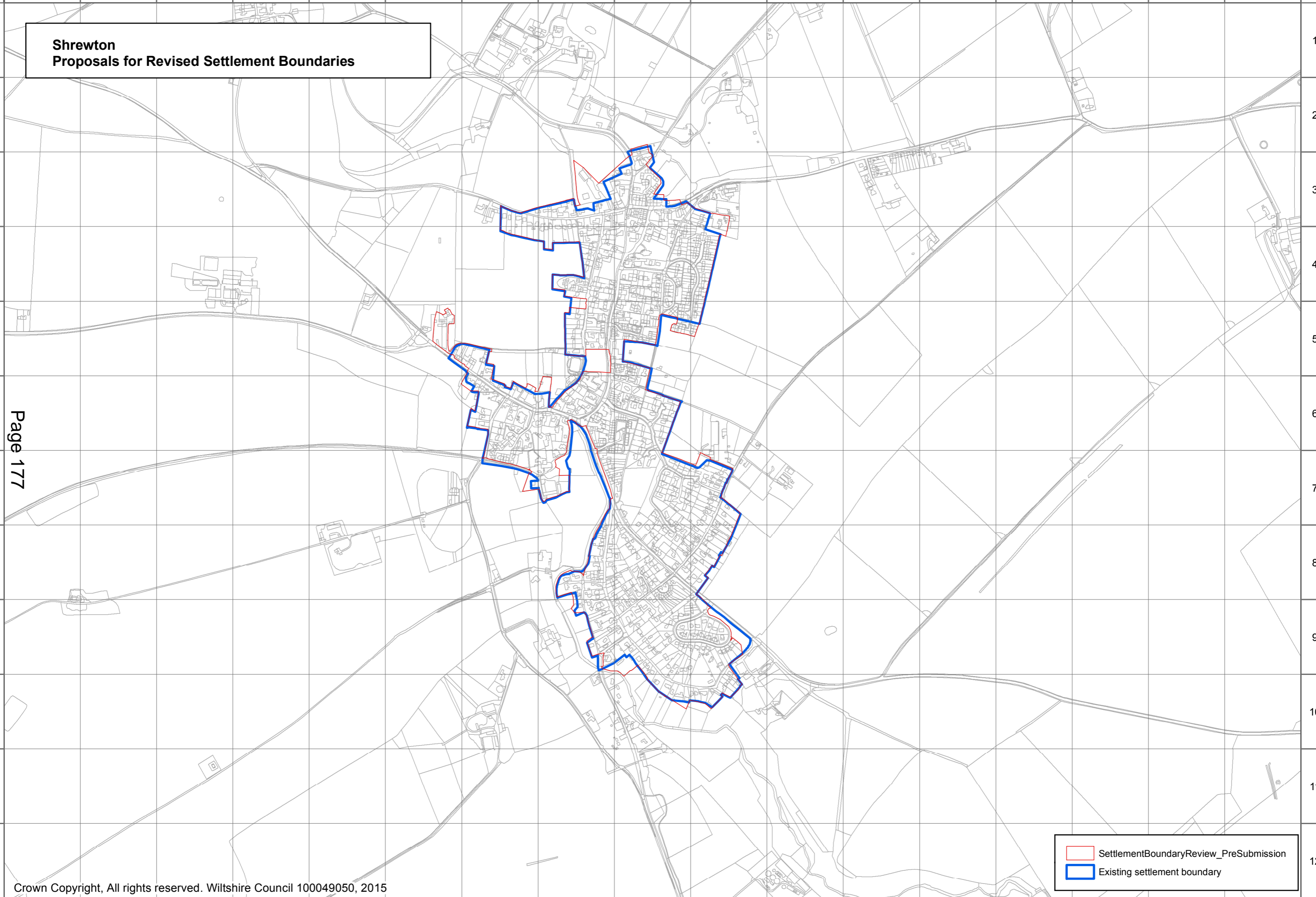
	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary





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**Shrewton  
Proposals for Revised Settlement Boundaries**





Page 177

	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary

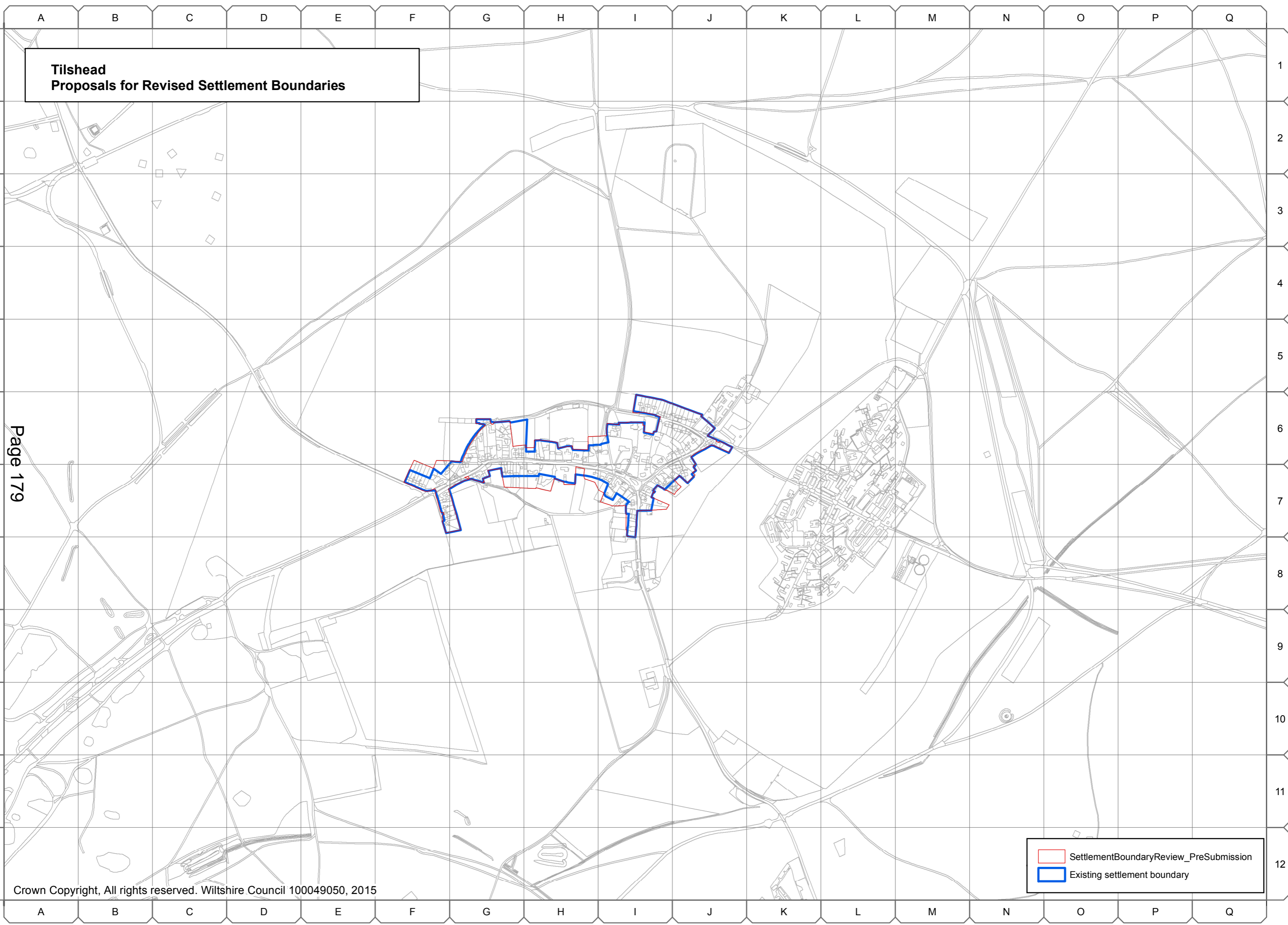
A B C D E F G H I J K L M N O P Q





**The Winterbournes  
Proposals for Revised Settlement Boundaries**

	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary

**Tilshead  
Proposals for Revised Settlement Boundaries**

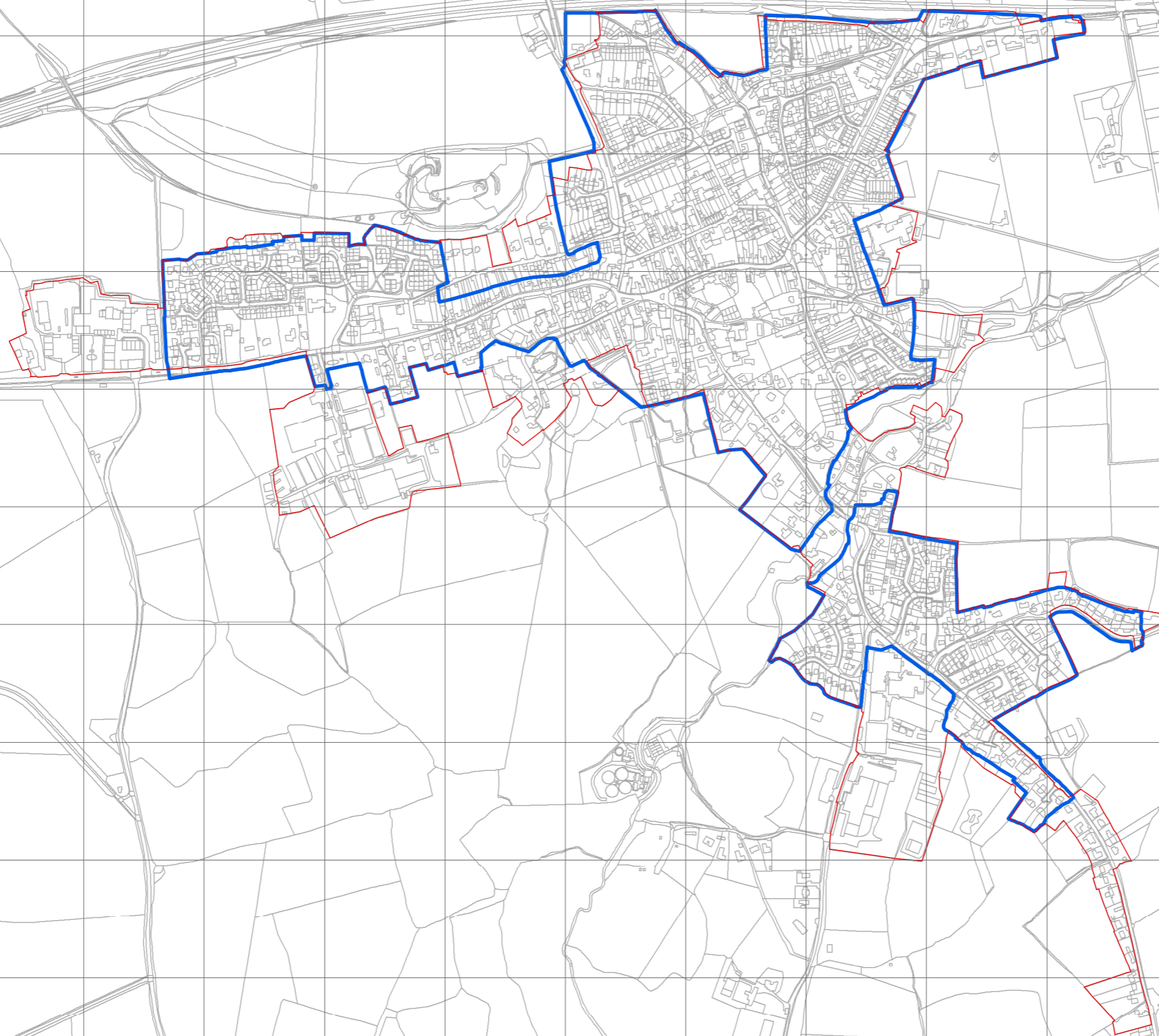


	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary





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**Mere  
Proposals for Revised Settlement Boundaries**



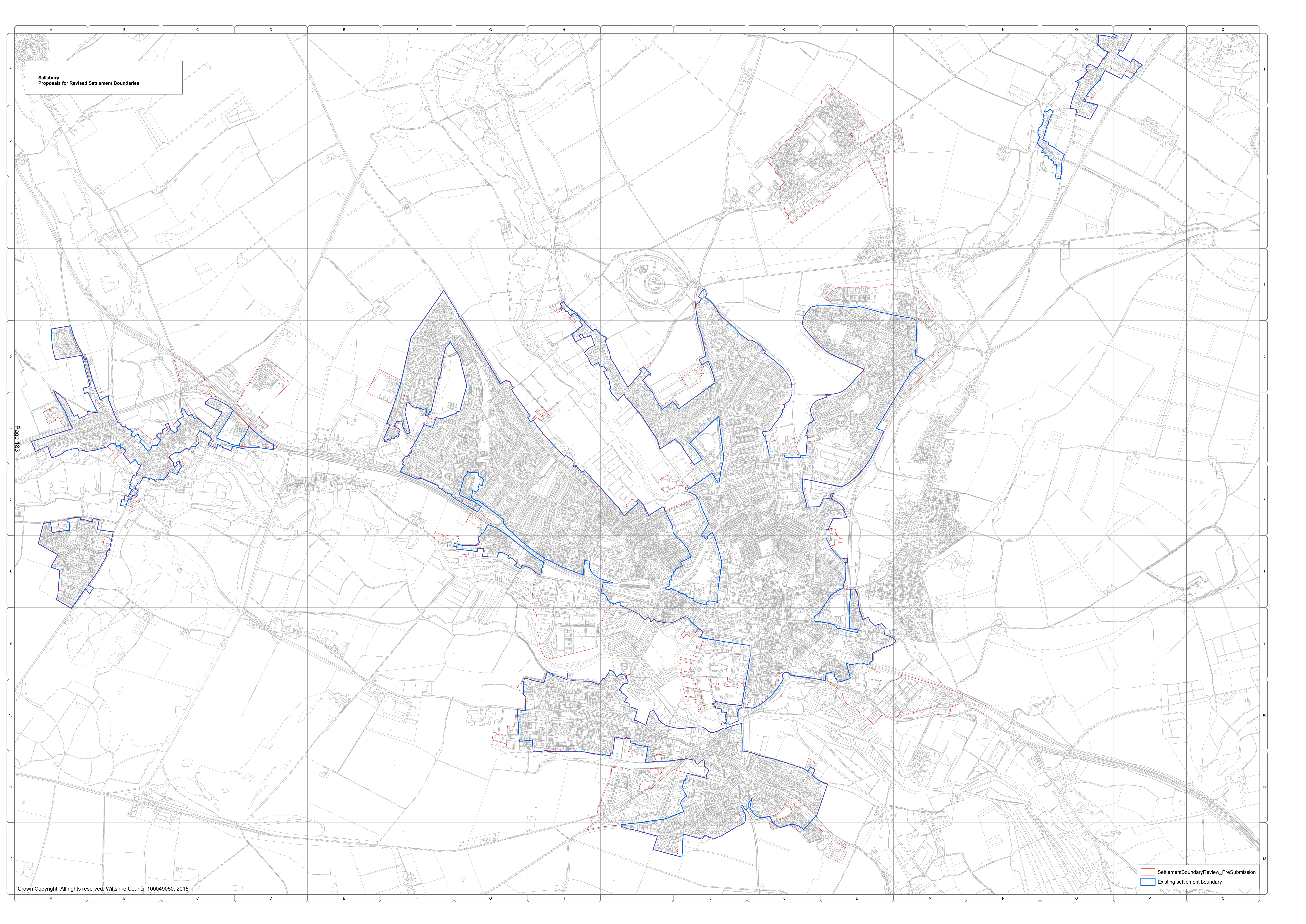
Page 181

	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary



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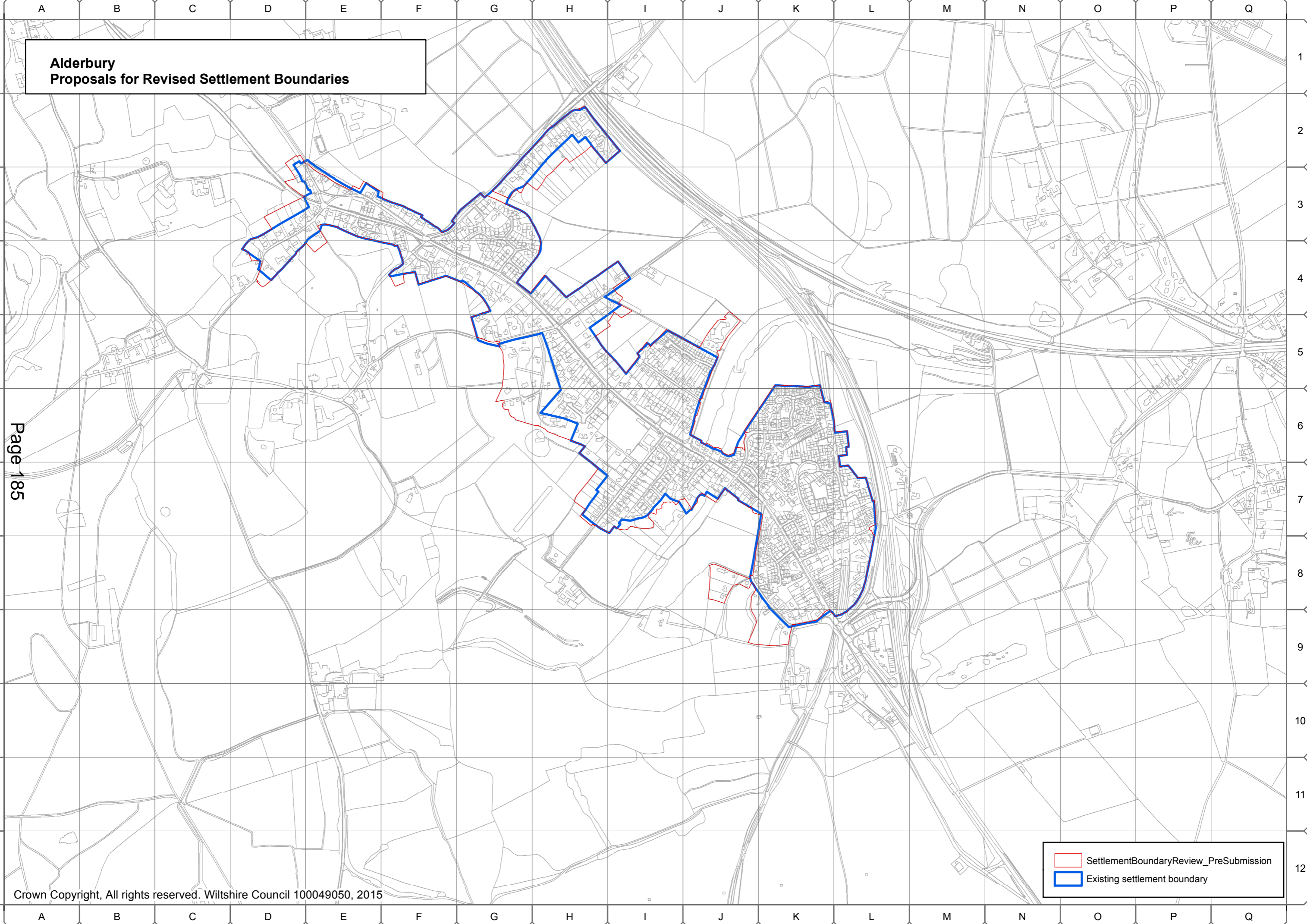
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**Alderbury  
Proposals for Revised Settlement Boundaries**

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Page 185

	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary







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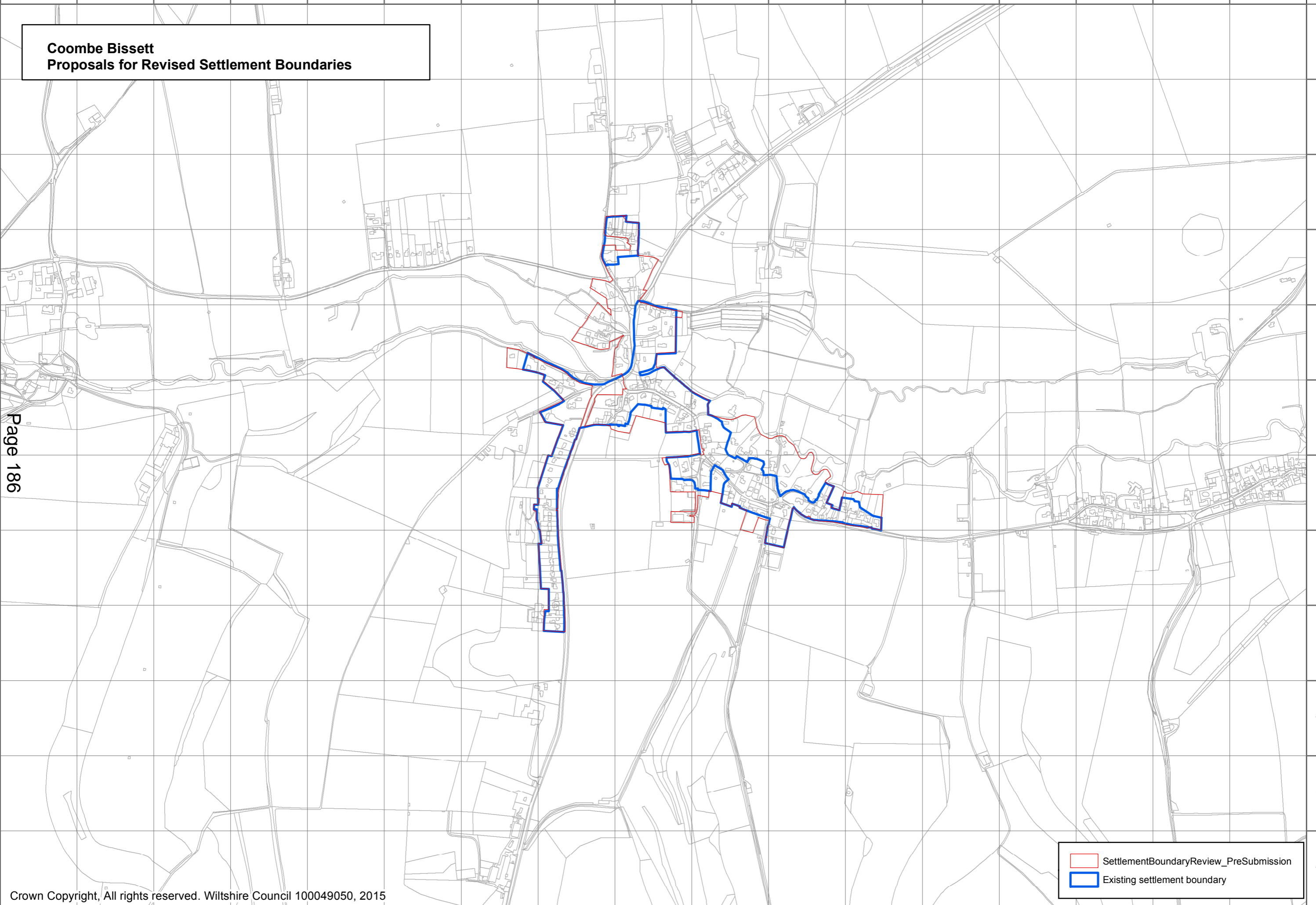
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**Coombe Bissett  
Proposals for Revised Settlement Boundaries**

Page 186

	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary

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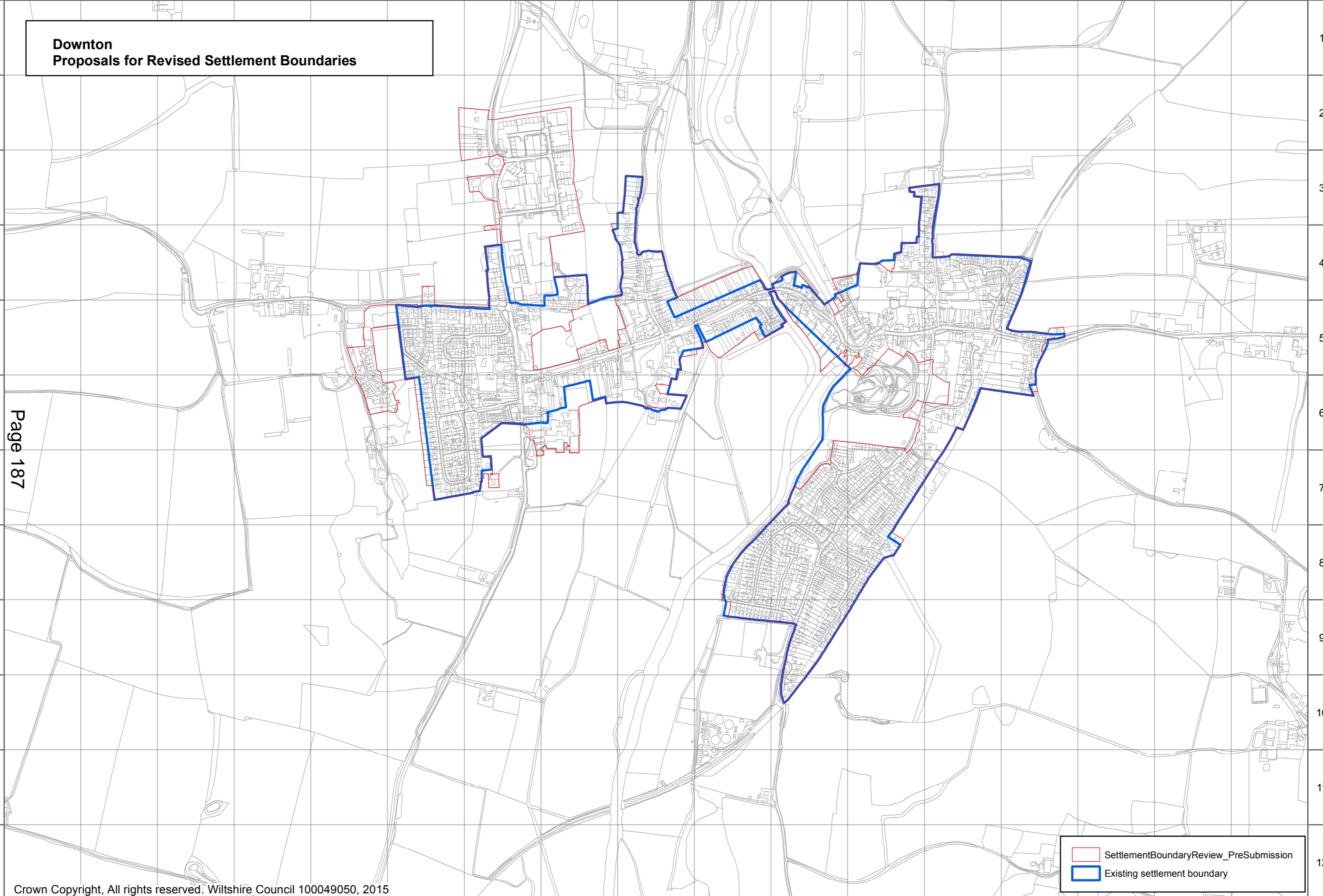
**Downton  
Proposals for Revised Settlement Boundaries**

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Page 187

	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary

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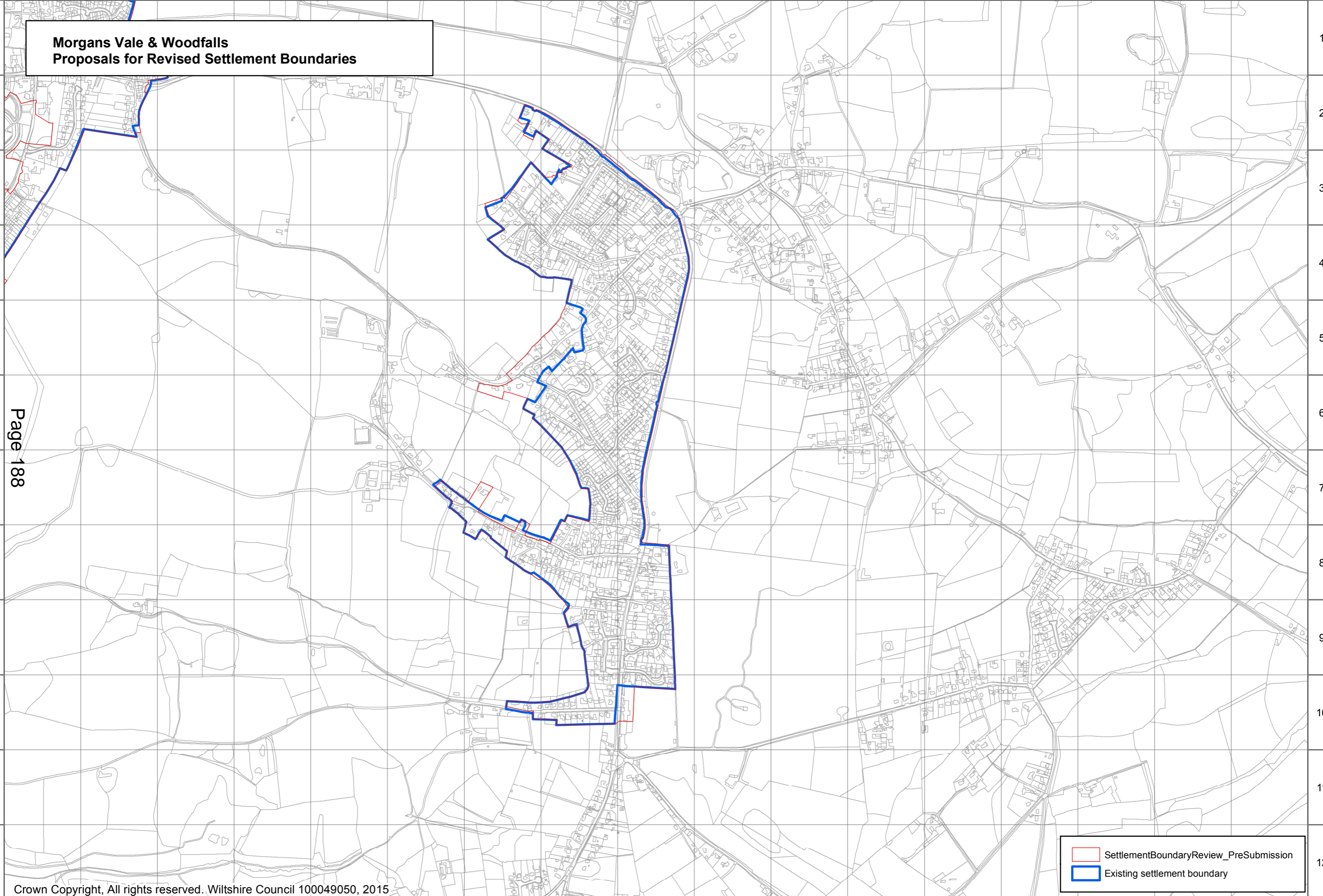






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**Morgans Vale & Woodfalls  
Proposals for Revised Settlement Boundaries**



Page 188

	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary

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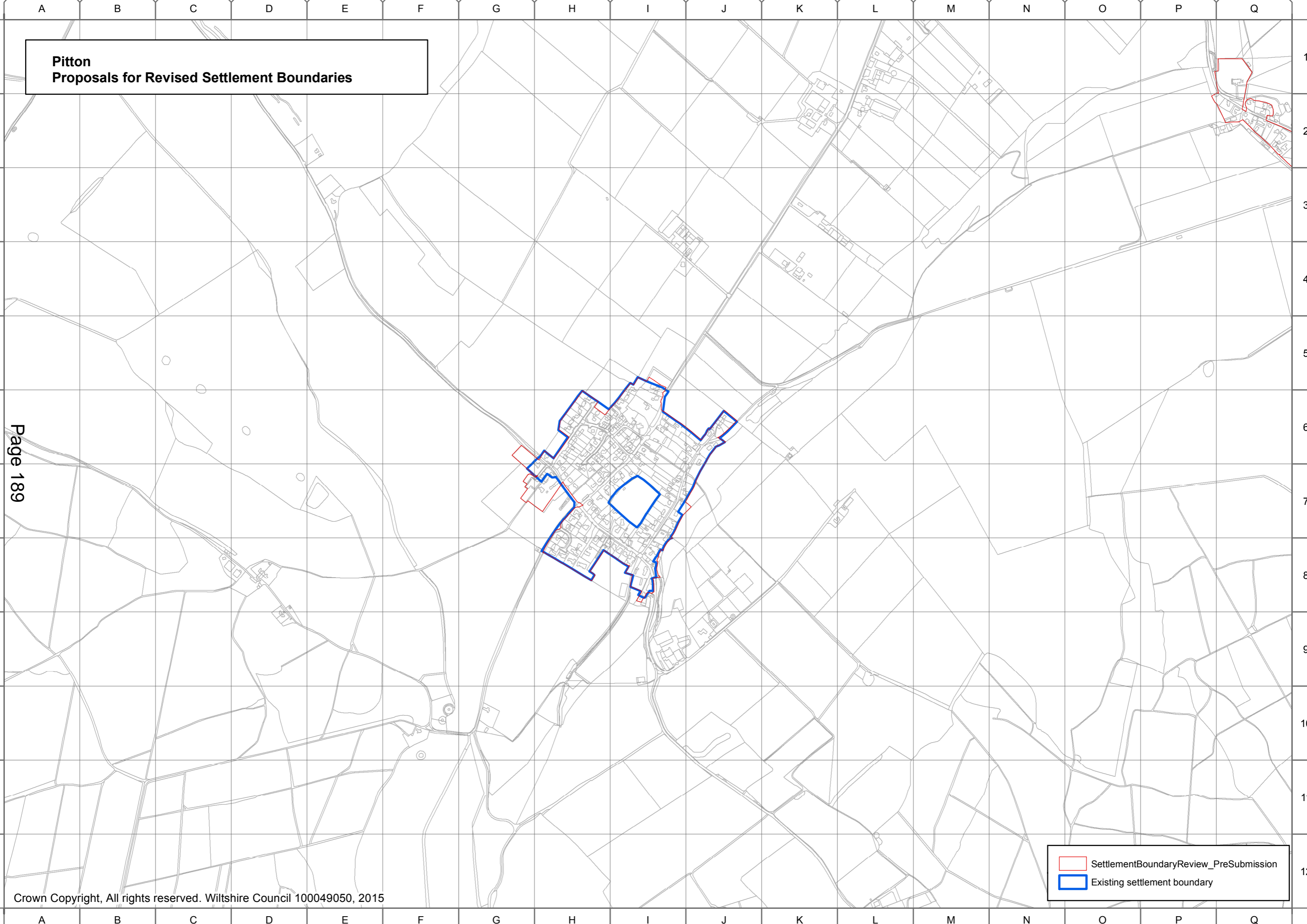
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**Pitton  
Proposals for Revised Settlement Boundaries**

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Page 189

	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary





**Whiteparish  
Proposals for Revised Settlement Boundaries**

	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary



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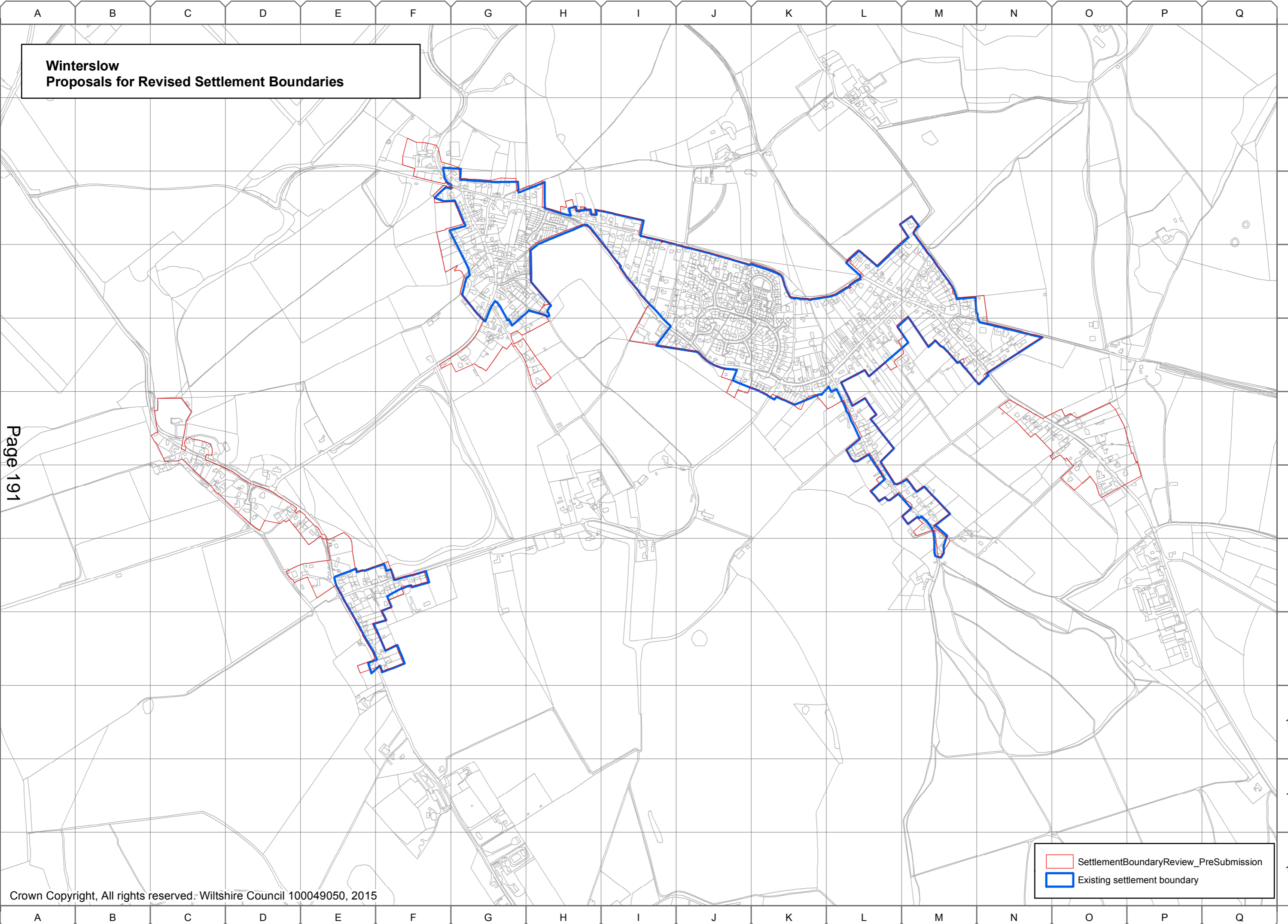
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**Winterslow  
Proposals for Revised Settlement Boundaries**

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Page 191

	SettlementBoundaryReview_PreSubmission
	Existing settlement boundary





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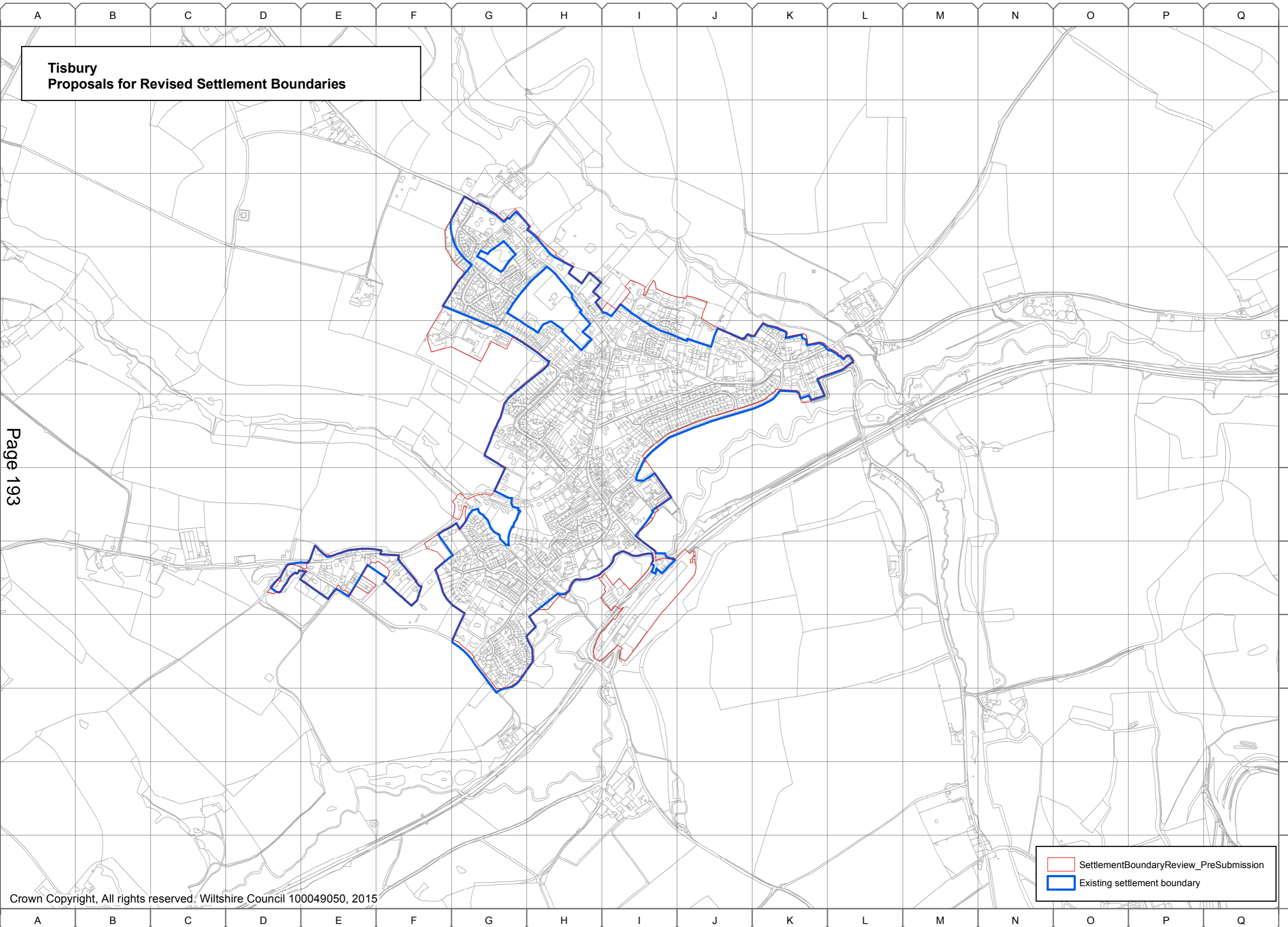
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**Tisbury  
Proposals for Revised Settlement Boundaries**

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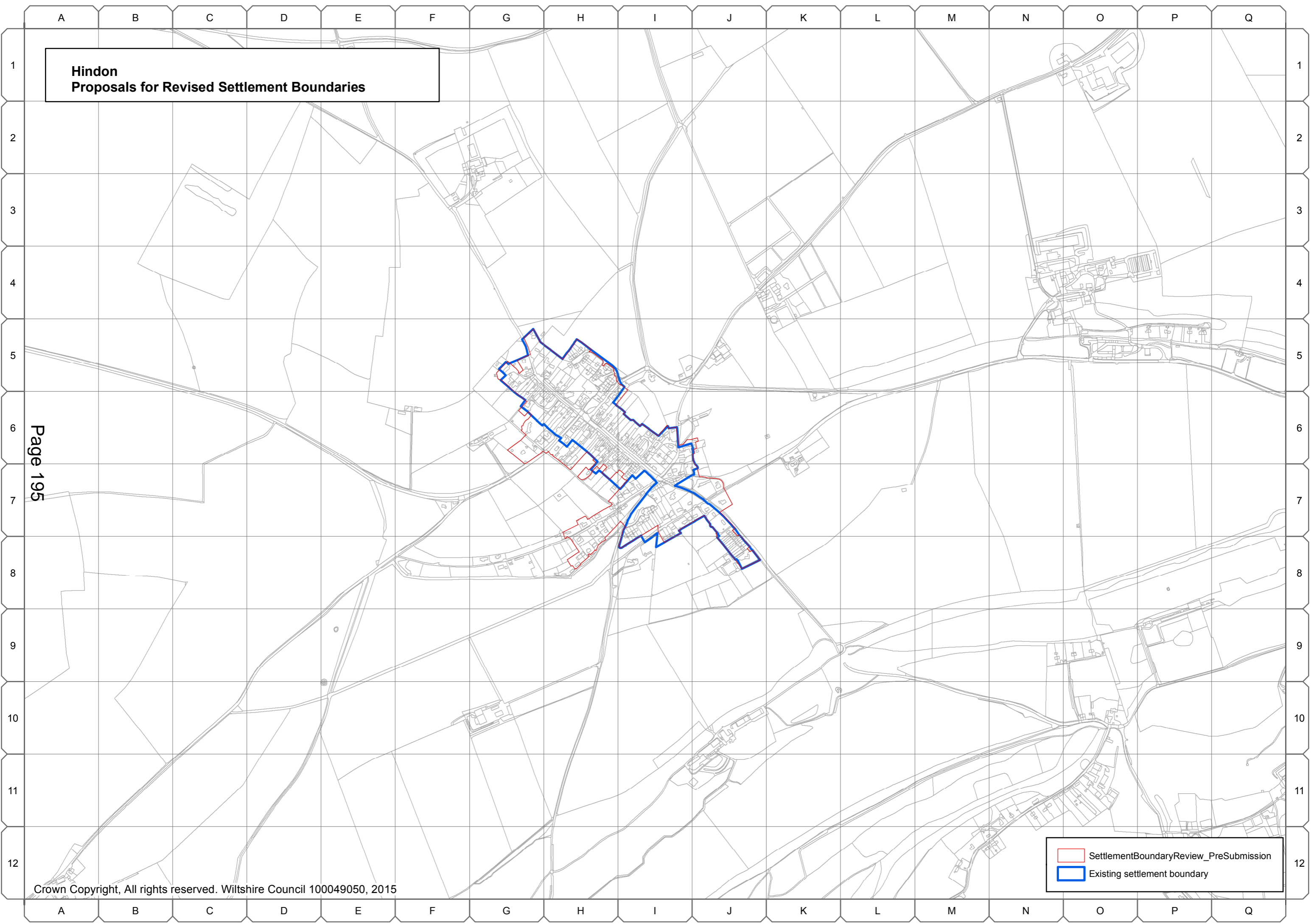
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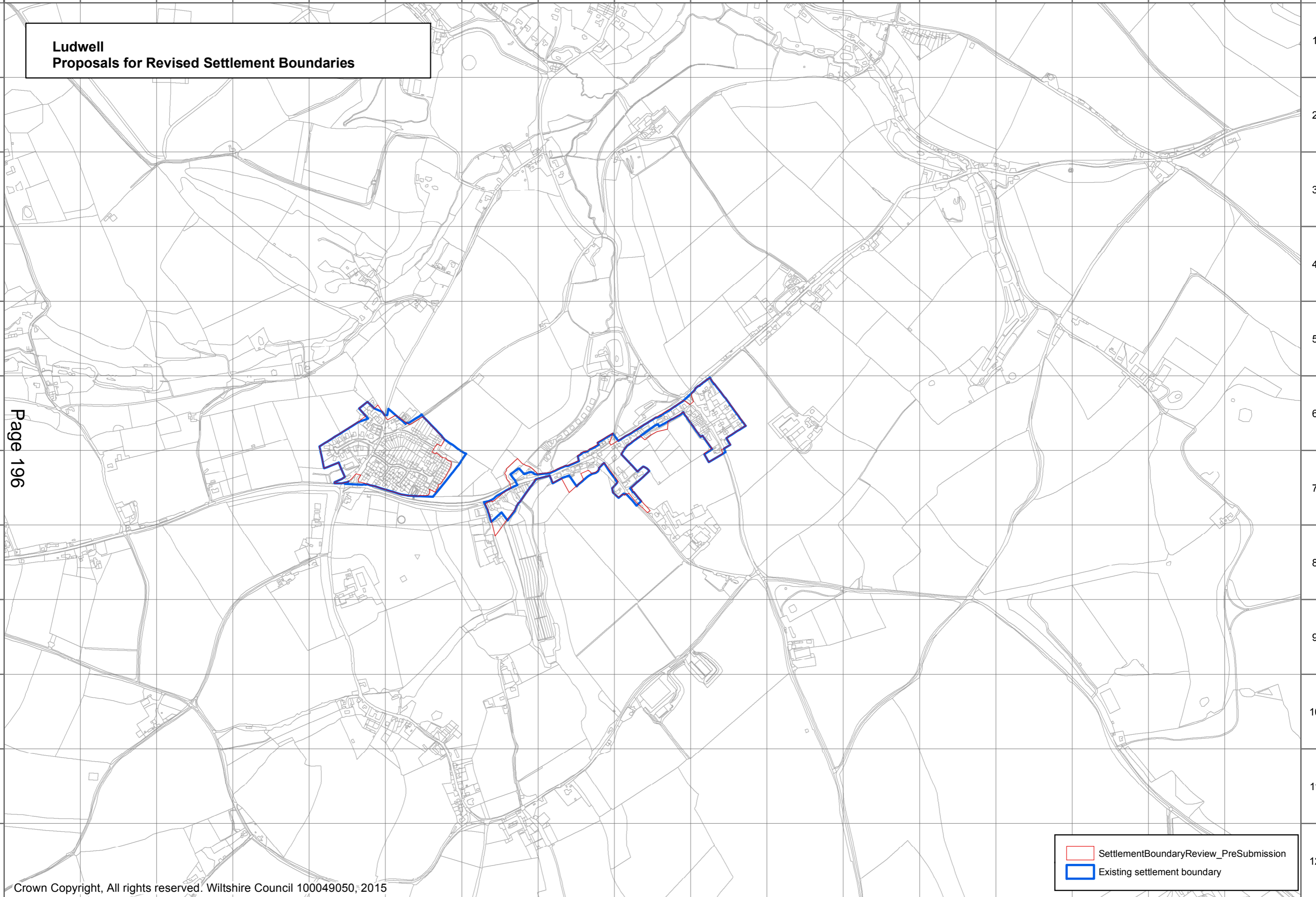
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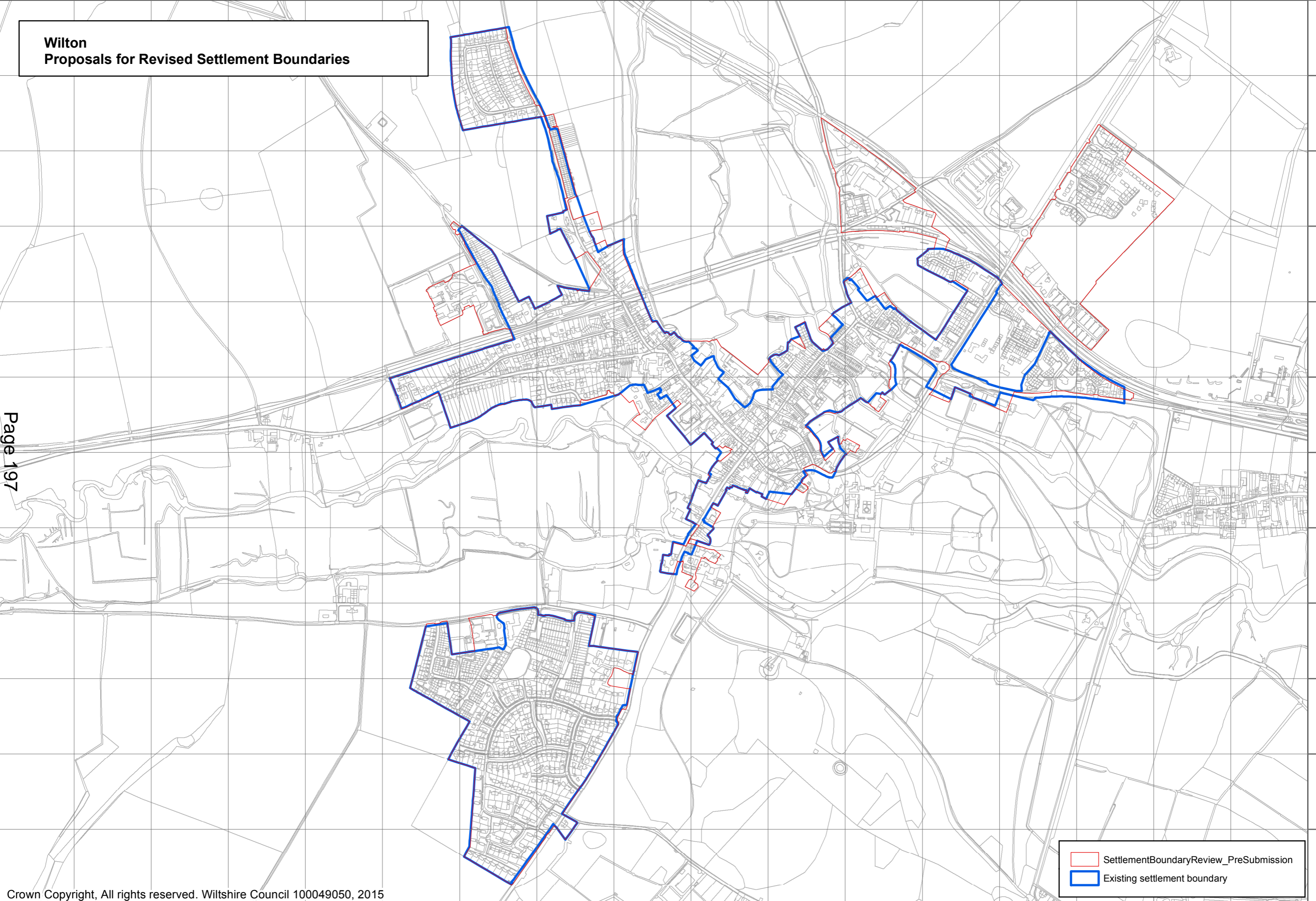
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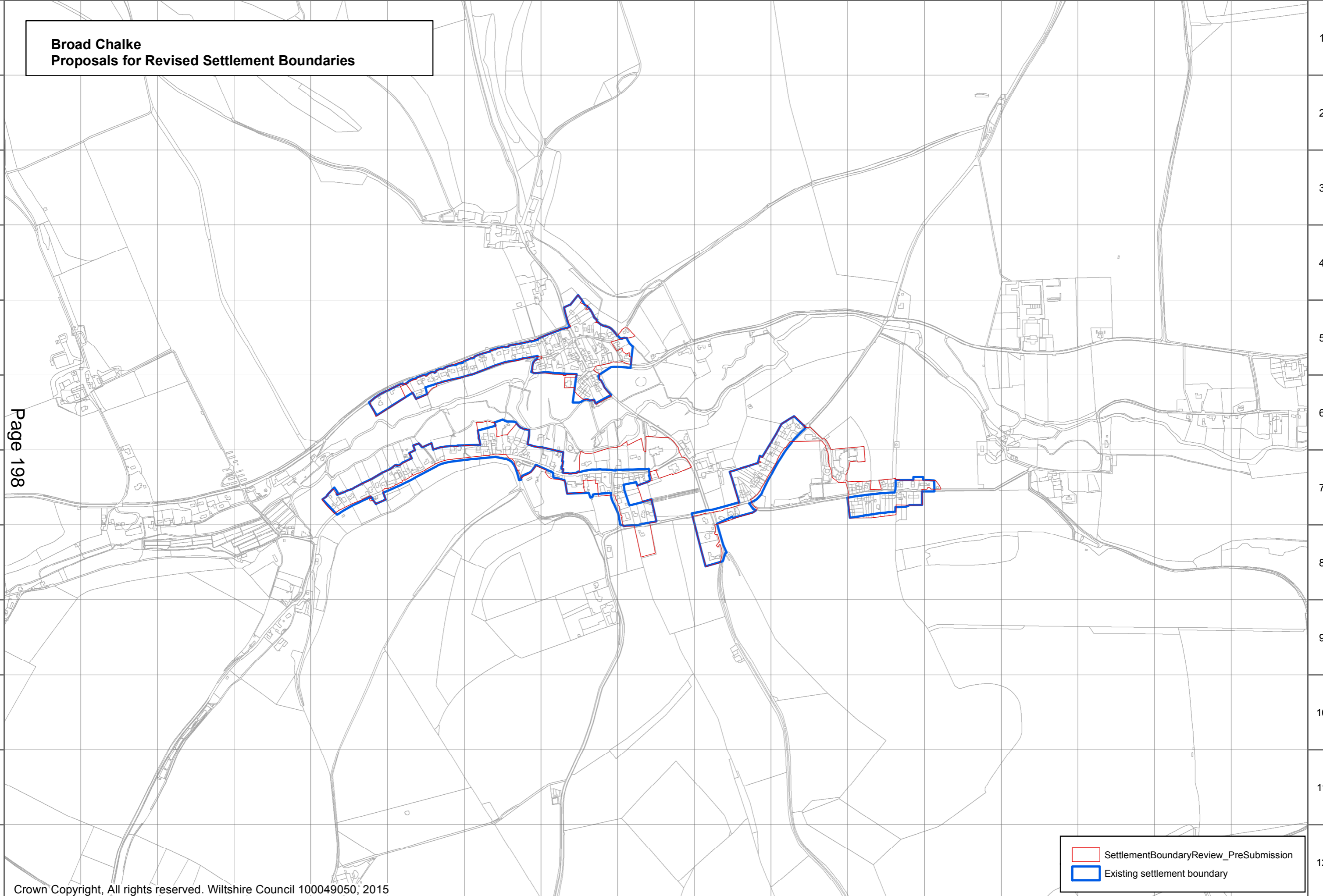


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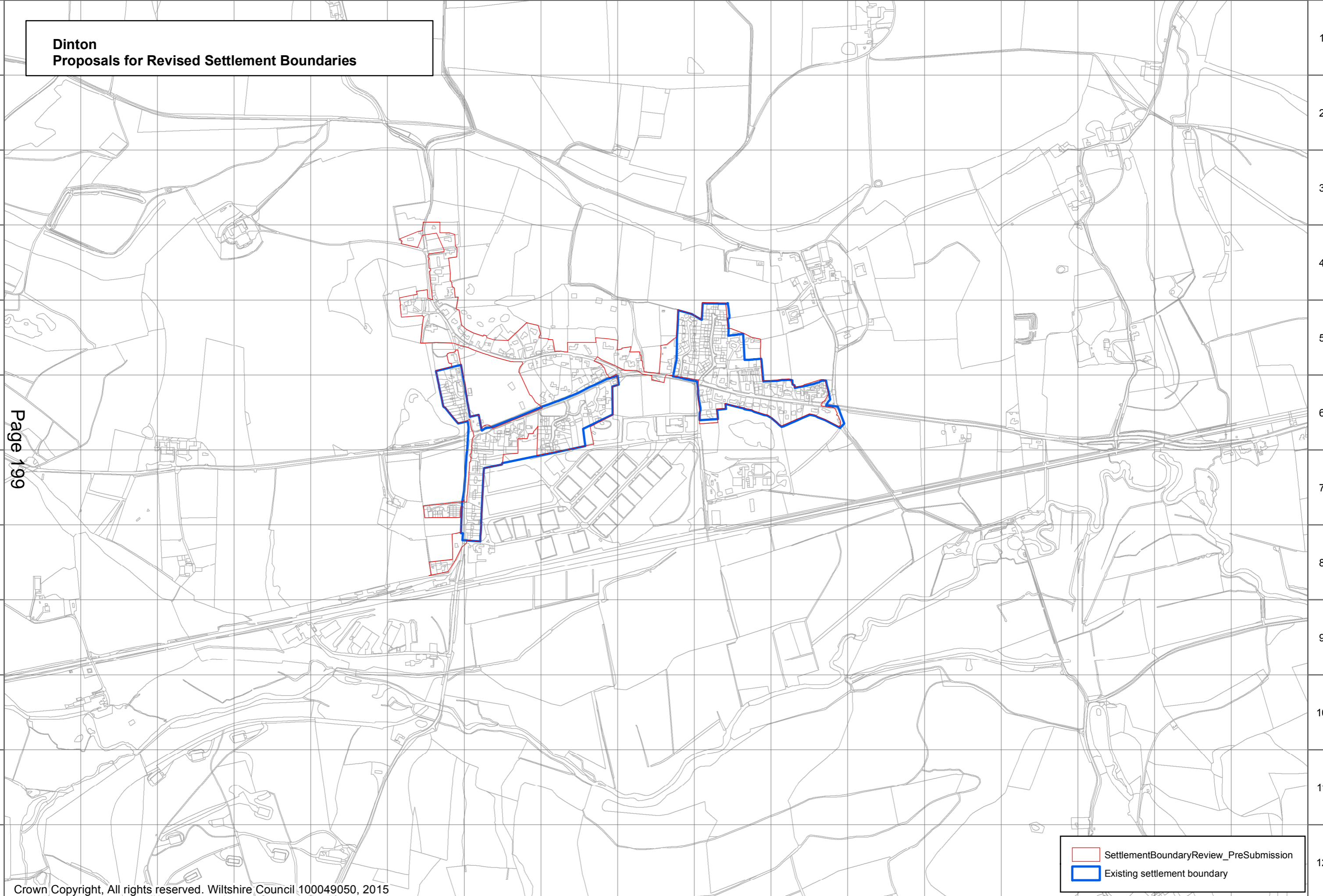
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## **APPENDIX 2**

# **Wiltshire Housing Site Allocations Plan**

## **Topic Paper 1: Settlement Boundary Review Methodology**

June 2017



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## Executive Summary

*Topic Paper 1: Settlement Boundary Review Methodology* is summarised below.

<b>Chapter/ stage</b>		
1	<b>Introduction</b>	Overview of Wiltshire Housing Site Allocations Plan and settlement boundary review process and methodology paper.
<b>Part 1</b>		
<b>Developing the draft settlement boundary review methodology</b>		
2	<b>Policy review</b>	Reviewing the policy basis for the existing settlement boundaries.
3	<b>Best practice review</b>	Reviewing selected best practice examples of approaches undertaken by other local planning authorities (LPAs) when reviewing settlement boundaries.
4	<b>Feedback from Regulation 18 Consultation</b>	Identification and consideration of the issues raised in feedback from the Regulation 18 Consultation on the scope of the Wiltshire Housing Site Allocations Plan (March to May 2014).
5	<b>Draft settlement boundary review methodology</b>	Developing a draft settlement boundary review methodology and accompanying maps showing the draft settlement boundaries for each settlement
<b>Part 2</b>		
<b>Developing the revised settlement boundary review methodology</b>		
6	<b>Informal consultation with town and parish councils</b>	Informal consultation with town and parish councils on the draft settlement boundaries for each settlement (July to September 2014).
7	<b>Feedback from the informal consultation with town and parish councils</b>	An identification and consideration of the issues raised in feedback from the informal consultation on the draft settlement boundary review methodology and maps.
8	<b>Revised settlement boundary review methodology</b>	Developing a revised settlement boundary review methodology and accompanying maps showing the draft settlement boundaries for each settlement

The Draft Plan has been published, supported by the following topic papers:

Document	Purpose
Community Area Topic Papers	<p>Reports on stages 1 to 4a of the site selection process for each community area, including a summary of relevant outputs from stage 3.</p> <p>Reports on the process and outcome of settlement boundary review for each community area settlement</p>
Topic Paper 1: Settlement Boundary Review Methodology	Explains the process followed to review settlement boundaries and how it was developed
Topic Paper 2: Site Selection Process Methodology	Explains the process followed to select preferred sites and produce plan proposals
Topic Paper 3 : Housing land Supply	Provides the quantitative evidence for housing land requirements
Topic Paper 4 : Developing Plan Proposals F	Reports on how preferred sites affect housing land supply for each Housing Market Area in terms of meeting WCS requirements and the spatial strategy
Topic Paper 5 : Assessment of Viability	Tests the ability of sites to be developed, provide policy compliant levels of affordable housing and necessary infrastructure



## Chapter 1: Introduction

- 1.1. The Wiltshire Housing Site Allocations Plan ('the Plan') does two things:
  - It reviews all settlement boundaries in the Wiltshire Core Strategy (WCS) (except for Chippenham, which has been addressed through the Chippenham Site Allocations Plan)
  - Identifies, where necessary, new allocations for housing at settlements to provide for additional housing to help deliver the WCS housing requirement

### Settlement Boundary Review

- 1.2. The Council did not review the extent of the boundaries to inform the WCS and relied upon the former district local plans. They would instead be reviewed as a part of preparing this Plan.
- 1.3. Consequently, the Council has undertaken a comprehensive review of the boundaries to ensure they are up-to-date and adequately reflect changes which have happened since they were first established. The Plan amends settlement boundaries where necessary. It is also the prerogative of local communities to review them through the preparation of neighbourhood plans.
- 1.4. This document sets out the methodology for reviewing settlement boundaries and how it was developed.

### The Site Selection Process

- 1.5. The WCS refers to the role of this Plan, in combination with the Chippenham Site Allocations Plan, to help ensure a sufficient choice and supply of suitable sites throughout the plan period in accordance with national policy and to compliment neighbourhood planning.
- 1.6. A separate paper sets out the methodology for identifying suitable sites for housing development.

### Structure of this paper

- 1.7. Part I explains the development of the draft settlement boundary review methodology, as follows:
  - Chapter 2 reviews the policy basis for the existing settlement boundaries
  - Chapter 3 reviews selected best practice examples of how other local planning authorities have reviewed their settlement boundaries

- Chapter 4 summarises the feedback from the Regulation 18 Consultation on the scope of the Plan
  - Chapter 5 sets out the draft settlement boundary review methodology
- 1.8. Part II explains the development of the revised settlement boundary review methodology following an informal consultation, which was targeted at town and parish councils but open to comments from others, as follows:
- Chapter 6 summarises the process by which the Council undertook an informal consultation with town and parish councils and the feedback received
  - Chapter 7 identifies and considers the issues raised in the feedback from town and parish councils
  - Chapter 8 sets out the revised settlement boundary review methodology



## Part I: Developing the draft settlement boundary review methodology

### Chapter 2: Policy review

- 2.1. This chapter reviews the policy basis for the existing settlement boundaries, which were established by the district local plans and retained in the Wiltshire Core Strategy ('the WCS').

#### National Planning Policy

- 2.2. The National Planning Policy Framework ('the NPPF'), published in March 2012, encourages sustainable patterns of development. For example, the eleventh core principle, in paragraph 17 of the NPPF, states that the planning system should:

*“actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus on significant development in locations which are or can be made sustainable.”*

- 2.3. Also, paragraph 53 of the NPPF states that:

*“local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”*

- 2.4. The Planning Practice Guidance supports the use of settlement boundaries as a policy tool. It affirms that all settlements may play a role in delivering sustainable development in rural areas<sup>1</sup>.

#### District plans

- 2.5. The former district local plans established the settlement boundaries and used a variety of terms to describe them, as shown in *Table 2.1* below.

District Local Plan	Terminology for settlement boundaries
Kennet Local Plan 2011	'Limits of development'
North Wiltshire Local Plan 2011	'Framework of settlement'
West Wiltshire Local Plan 1 <sup>st</sup> Alteration 2004	'Town policy limits' or 'village policy limits'
Salisbury District Local Plan 2011	'Housing policy boundary'

Table 2.1 – Terminology for settlement boundaries in district local plans

<sup>1</sup> PPG Paragraph: 001; Reference ID: 50-001-20160519.

2.6. Table 2.2 below lists the district plan policies that established the policy basis for settlement boundaries. These policies were replaced by Core Policy 1 (Settlement strategy) and Core Policy 2 (Delivery strategy) of the WCS.

District Local Plan	Policy	Description
<b>Kennet Local Plan 2011</b>	<b>Policy NR6</b> – Sustainability and protection of the countryside	Restricts development to within the Limits of Development defined for the towns and villages as identified on the proposals and inset maps, unless: (i) it is of demonstrable benefit to the local rural economy or the social well-being of the local rural community, and/ or (ii) it is permitted by other policies in the Local Plan.
<b>West Wiltshire District Plan 1<sup>st</sup> Alteration (2004)</b>	<b>H1</b> – Further housing development within towns	Restricts housing development outside of the defined town policy limits, as identified on the proposals and inset maps.
	<b>H17</b> – Village policy limits	Permits limited development within the defined village policy limits, which is compatible with the criteria within Policy H17, as identified on the proposals and inset maps.
<b>North Wiltshire Local Plan 2011</b>	<b>H3</b> – Residential development within framework boundaries	Permits residential development within the framework boundaries, as defined on the Proposals Maps, which is compatible with the criteria in Policy H3.
<b>Salisbury District Local Plan 2011</b>	<b>H16</b> – Housing policy boundaries	Permits residential development within the housing policy boundaries, as defined on the Proposals Maps, which is compatible with the criteria in Policy H16.

Table 2.2 – district local plan policies that established the existing settlement boundaries

### Wiltshire Core Strategy

2.7. The WCS uses the term “limits of development” to refer to settlement boundaries. Core Policy 1 presents a settlement strategy for managing growth over the period up to 2026. This settlement strategy establishes tiers of settlements based on:

- an understanding of their role and function, and
- how they relate to their immediate communities and wider hinterland.



- 2.8. The WCS retains settlement boundaries for principal settlements, market towns, local service centres and large villages, as shown on its accompanying Policies Map.
- 2.9. Core Policy 2 of the WCS has a general presumption in favour of sustainable development within settlement boundaries. Development will not be permitted outside settlement boundaries, other than in circumstances permitted by other policies listed in paragraph 4.25 of the WCS. These 'exception policies' are listed below:
- Additional employment land (Core Policy 34)
  - Military establishments (Core Policy 37)
  - Development related to tourism (Core Policies 39 and 40)
  - Rural exception sites (Core Policy 44)
  - Specialist accommodation provision (Core Policies 46 and 47), and
  - Supporting rural life (Core Policy 48).
- 2.10. Paragraph 4.13 of the WCS allows for the review of the existing settlement boundaries through the Wiltshire Housing Site Allocations Plan. The settlement boundary for Chippenham has been reviewed separately through the Chippenham Site Allocations Plan. Settlement boundaries can also be reviewed by the local community through the neighbourhood planning process.
- 2.11. *Appendix A* to this paper contains a list of settlements that have retained their settlement boundaries, showing those reviewed by this Plan and those reviewed by the Chippenham Site Allocations Plan or a sufficiently advanced neighbourhood planning process.

## Conclusions

- 2.12. The adopted WCS uses settlement boundaries as a policy tool for ensuring the right type of development in the right place. National planning policy encourages sustainable patterns of development and resists inappropriate development in locations where it might cause harm to the local area. These are key underlying principles that will need to be borne in mind when reviewing the existing settlement boundaries. The district local plan policies highlight the different approaches to planning sustainable patterns of development taken by the former district councils in Wiltshire. Understanding these different approaches and the similar principles upon which they are based is important in developing a consistent approach across the whole of Wiltshire.

## Chapter 3: Best practice review

- 3.1. This chapter reviews how other local planning authorities have undertaken a review of their settlement boundaries. The case studies in this review come from Winchester City Council, Purbeck District Council and Kettering Borough Council.

### Case study 1: Winchester City Council

- 3.2. Winchester City Council covers a 250 square mile area of central Hampshire, including the designated heritage city of Winchester itself and neighbouring settlements such as Bishops Waltham, Denmead and The Alresford.
- 3.3. *Table 3.1* sets out how the City Council has reviewed its settlement boundaries.

<b>Case study 1: Winchester City Council<sup>2</sup></b>	
<b>Key features:</b>	<ul style="list-style-type: none"> <li>• Boundary drawn tightly around built form</li> <li>• Follow defined physical features</li> <li>• Need not be continuous; potentially two or more separate elements</li> </ul>
<b>Includes:</b>	<ul style="list-style-type: none"> <li>• Built/ commenced allocations/ planning permissions</li> <li>• Small pieces of land below threshold for allocation or potential infill/ rounding off opportunity</li> <li>• Curtilage contained, visually part of the urban area and separated from the open countryside</li> </ul>
<b>Excludes:</b>	<ul style="list-style-type: none"> <li>• Playing fields or open space at the edge of settlements</li> <li>• Affordable housing permitted on exception sites</li> <li>• Loose knit buildings on the edge of settlements</li> <li>• Outlying or isolated development, including farm buildings</li> <li>• Large gardens or other areas, e.g. paddocks or orchards, whose inclusion would harm the character, structure or form of the area</li> <li>• Important gaps, e.g. where a settlement is fragmented or where open gaps between developed areas should be retained</li> <li>• Camping and caravanning sites not in permanent residential use</li> <li>• Agriculture, forestry, equestrian development, minerals extraction, landfill and public utilities.</li> </ul>
<b>Methodology:</b>	<ul style="list-style-type: none"> <li>• Desk top review, using GIS mapping, aerial photography and information from planning applications</li> <li>• Site visits</li> <li>• Local consultation</li> <li>• Consistent application and explanation of judgements</li> </ul>

Table 3.1 – Winchester City Council’s approach to reviewing its settlement boundary

<sup>2</sup> Winchester City Council. (2014). *Settlement Boundary Review: Winchester District Local Plan Part 2: Development Management and Site Allocations*. Available: <http://www.winchester.gov.uk/assets/files/21793/Settlement-Boundary-Review-2014-FINAL-for-consultation-on-Draft-LPP2-21.10.2014.pdf>. Last accessed 13th October 2016.



### Case study 2: Purbeck District Council

- 3.4. Purbeck District Council covers a 156 square mile area of Dorset, including the Isle of Purbeck, which forms a large proportion of the area, and settlements north and west of the River Frome, including Wareham.
- 3.5. *Table 3.2* sets out how the District Council has reviewed its settlement boundaries.

<b>Case study 1: Purbeck District Council<sup>3</sup></b>	
<b>Key features:</b>	<ul style="list-style-type: none"> <li>• Boundary must be logical, easily identifiable and (normally) follow property boundaries and permanent features</li> <li>• Relates to the urban area and prevent undesirable sprawl</li> <li>• Adhere to settlement hierarchy by directing development towards the most sustainable location</li> <li>• Uses and developments with a clear social or economic relationship with the settlement (including sites within unimplemented planning permission)</li> </ul>
<b>Includes:</b>	<ul style="list-style-type: none"> <li>• Uses and buildings (including sites with unimplemented planning permission) that have a clear social or economic function</li> <li>• Uses and buildings that relate better to the built form of the settlement than the countryside</li> </ul>
<b>Excludes:</b>	<ul style="list-style-type: none"> <li>• Outlying development or small pockets of development that are clearly detached from the settlement</li> <li>• Rural exception sites for affordable housing</li> <li>• Open spaces at the edge of settlements, e.g. sports fields or allotments</li> <li>• Large, open residential gardens or paddocks</li> <li>• Important gaps</li> <li>• Uses that would not normally be found within the settlement boundary, e.g. agriculture or forestry</li> <li>• Camping and caravanning sites unless permanent year round residential occupancy</li> </ul>
<b>Methodology:</b>	<ul style="list-style-type: none"> <li>• Public consultation</li> <li>• Meetings with town and parish councils</li> </ul>

Table 3.2 – Purbeck District Council’s approach to reviewing its settlement boundary

### Case study 3: Kettering Borough Council

- 3.6. Kettering Borough Council covers a 90 square mile area of Northamptonshire, including Kettering, the main town after which it is named and where the Council is based, and other settlements and parishes.

<sup>3</sup> Purbeck District Council. (2015). *Reviewing the Plan for Purbeck’s Future: Purbeck Local Plan Partial Review: Settlement Boundary Review*. Available: <https://www.dorsetforyou.gov.uk/article/409105/Partial-Review-of-Purbeck-Local-Plan-Part-1---Planning-Purbecks-Future>. Last accessed 13 October 2016.

3.7. Table 3.3 sets out how the Borough Council has reviewed its settlement boundaries.

Case study 1: Kettering Borough Council <sup>4</sup>	
<b>Key features:</b>	<ul style="list-style-type: none"> <li>• Boundary drawn tightly around built form</li> <li>• Follow defined physical features</li> <li>• Need not be continuous; potentially two or more separate elements</li> </ul>
<b>Includes:</b>	<ul style="list-style-type: none"> <li>• Existing commitments for built developments</li> <li>• Buildings on the edge of villages which relate closely to the economic or social function of the village</li> <li>• Curtilages of properties which are contained and visually separated from the open countryside</li> <li>• New allocations</li> </ul>
<b>Excludes:</b>	<ul style="list-style-type: none"> <li>• Playing fields or open space at the edge of settlements</li> <li>• New allocations for affordable housing</li> <li>• Isolated developments which are physically or visually detached from the settlement</li> <li>• Large gardens and other open areas which are visually open and relate to the open countryside rather than the settlement</li> <li>• Large gardens or other areas whose inclusion or possible development would harm the structure, form and character of the settlement</li> </ul>
<b>Methodology:</b>	<ul style="list-style-type: none"> <li>• Desk top review, using GIS mapping and aerial photography</li> <li>• Site visits</li> <li>• Consultation with parish councils</li> </ul>

Table 3.3 – Kettering Borough Council’s approach to reviewing its settlement boundary

## Conclusions

3.8. It is useful to understand how a range of other local planning authorities have undertaken a review of their settlement boundaries. While there are some differences in their approaches, they generally apply similar principles, such as:

- Boundaries tightly defined around the built form that follow defined and permanent features
- Exclusion of outlying or small pockets of development that are clearly detached from the settlement, and
- Boundaries need not be continuous

3.9. There does need to be, as far as possible, a consistent application of principles with a clear justification and reasoning for changes. However, it appears decisions often depend upon officer judgement such as, for example, on whether buildings relate more to the built form or open countryside.

<sup>4</sup> Kettering Borough Council. (2011). *Site Specific Proposals Local Development Document. Background Paper: Settlement Boundaries*. Available: [https://secure.kettering.gov.uk/downloads/file/4918/settlement\\_boundaries](https://secure.kettering.gov.uk/downloads/file/4918/settlement_boundaries). Last accessed 13 October 2016.



## Chapter 4: Feedback from the Regulation 18 Consultation

- 4.1. This chapter outlines the purpose of the Regulation 18 Consultation on the scope of the Wiltshire Housing Site Allocations Plan ('the Plan') and summarises the feedback.

### The Regulation 18 Consultation

- 4.2. Between 24<sup>th</sup> March and 5<sup>th</sup> May 2014, the Council undertook a formal public consultation on the scope of the Plan. The consultation signalled that the Plan would:

- Review settlement boundaries across Wiltshire, and
- Consider housing site proposals

- 4.3. The consultation also included a 'call for sites' request, which asked for potential housing sites to be submitted to the Council by completing a Strategic Housing Land Availability Assessment (SHLAA) form.

### Summary of consultation feedback

- 4.4. While the majority of responses related to potential housing sites, comments on the proposed settlement boundary focussed on the approach, the settlement strategy and the relationship with the neighbourhood planning process.

#### *Issue 1: The approach to the settlement boundary review*

- 4.5. It was suggested that there was an inconsistency between references in the WCS to the approach reviewing settlement boundaries. For instance, paragraph 4.13 states that:

*'these settlement boundaries will be reviewed as part of the Wiltshire Housing Site Allocations Plan and Chippenham Site Allocations Plan, as set out in the Council's Local Development Scheme, in order to ensure they are up to date and can **adequately** (emphasis added) reflect changes which have happened since they were first established.'*

- 4.6. However, paragraph 4.15 states that:

*'these settlement boundaries will also be reviewed as part of the Wiltshire Housing Site Allocations Plan as set out in the Council's Local Development Scheme, in order to ensure they remain up to date and **properly** (emphasis added) reflect building that has happened since they were first established.'*

- 4.7. Nevertheless, the Council considers both sentences to be similar, with the words ‘adequately’ and ‘properly’ used interchangeably.

*Issue 2: the settlement strategy*

- 4.8. It was also suggested that how settlements were classified in the district plans should be taken into account when reviewing the settlement boundary. It was highlighted that previous district plan policies had identified distinct settlements, which the WCS has then grouped together and classified them as large villages.
- 4.9. However, the Council considers that the settlement boundary review should reflect how settlements have been classified in Core Policy 1 of the WCS and can show separate boundaries for each settlement forming a group.

*Issue 3: the relationship with the neighbourhood planning process*

- 4.10. There were queries about the relationship between the settlement boundary review and the neighbourhood planning process. Would the Plan take into account proposals in Neighbourhood Plans? Would Neighbourhood Plans need to have reached an advanced stage?
- 4.11. The Council agrees that this issue requires clarification. It would be important to find out from town and parish councils if they were looking to review their settlement boundaries through a neighbourhood plan.

**Conclusions**

- 4.12. Few specific issues were identified through the Regulation 18 Consultation in relation to the proposed settlement boundary review. However, the relationship with the neighbourhood planning process is something that would need to be explored further. This could be done as part of the informal consultation with town and parish councils on draft settlement boundaries. It would help in better understanding the relationship between the two processes.
- 4.13. Further information on the consultation and feedback can be found in the Consultation Statement<sup>5</sup> accompanying the Plan.

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<sup>5</sup> Wiltshire Council (June 2017), Wiltshire Housing Sites Allocations Plan Consultation Statement. Annex A: Report on the Regulation 18 Consultation.



## Chapter 5: The draft settlement boundary review methodology

- 5.1. This chapter sets out the draft settlement boundary review methodology. It was developed from a consideration of feedback from the Regulation 18 Consultation and the policy and best practice reviews.

### The draft settlement boundary review methodology

- 5.2. *Table 5.1* below sets out the draft settlement boundary review methodology.

The draft settlement boundary review methodology	
<b>Where practical, the draft settlement boundaries follow clearly defined physical features, such as, walls, fences, hedgerows, roads and water courses in order to define the built area of the settlement.</b>	
<b>Areas which have been included are:</b>	<ul style="list-style-type: none"> <li>• Both built and extant planning permissions for residential and employment uses for areas which are physically/ functionally related to the settlement</li> <li>• Existing and extant planning permissions for community facilities, such as religious buildings, schools and community halls which are considered to be physically/ functionally related to the settlement</li> <li>• Site allocations identified in the development plan for both residential, community and employment uses which are physically/ functionally related to the settlement.</li> </ul>
<b>Areas which have been excluded are:</b>	<ul style="list-style-type: none"> <li>• Curtilages of properties which have the capacity to extend the built form of the settlement. This includes large residential gardens</li> <li>• Recreational or amenity space at the edge of settlements which primarily relate to the countryside (in form or nature)</li> <li>• Isolated development which is physically or visually detached from the settlement (including farm buildings or agricultural buildings, renewable energy installations).</li> </ul>

Table 5.1 – the draft settlement boundary review methodology

- 5.3. The Council followed this draft methodology to draw new settlement boundaries. A desktop review used geographical information system (GIS) data sets, including aerial imagery and ordnance survey maps. It sought to define a new boundary that would include the central area for each principal settlement, market town, local service centre and large village. This extended to schools, existing employment areas and defined curtilages of existing buildings within the settlement, where appropriate to the criteria in the draft methodology.

- 5.4. The Council presented the new boundaries for each settlement on OS maps, which also included the existing boundary to clearly show the areas of change. The maps were made available through the Council's online consultation portal as part of an informal consultation (between July and September 2014) targeted at town and parish councils but open to comments from others<sup>6</sup>.

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<sup>6</sup> The maps showing the draft settlement boundaries (July 2014) are available to download from the Council's online consultation portal at [http://consult.wiltshire.gov.uk/portal/spatial\\_planning/sites\\_dpd/settlement\\_boundary\\_review\\_intial\\_and\\_informal\\_consultation](http://consult.wiltshire.gov.uk/portal/spatial_planning/sites_dpd/settlement_boundary_review_intial_and_informal_consultation).



## Part II: Developing the revised settlement boundary review methodology

### Chapter 6: The informal consultation with town and parish councils

- 6.1. This chapter outlines the process of consultation with town and parish councils about the draft settlement boundary review and summarises the feedback.

#### The informal consultation with town and parish councils

- 6.2. In July 2014, the Council published the draft settlement boundary review methodology and individual maps for each settlement with a settlement boundary. The maps were made available through the Council's online consultation portal<sup>7</sup>. An informal consultation on these proposals took place for an eight week period between 28 July and 22 September 2014. During the consultation period, the Council held briefing sessions for town and parish councils in Calne, Salisbury and Trowbridge.
- 6.3. The consultation targeted town and parish councils because they are representatives of their respective communities and may have detailed knowledge of their local area. However, for transparency, the Council made the methodology and maps publically available on its website and consultation portal from the start of the consultation.
- 6.4. The Council received comments from individuals and organisations, in addition to those from town and parish councils. Many arrived after the deadline. As this was an informal consultation, the Council accepted these comments to better inform the settlement boundary review.

#### Summary of consultation feedback

- 6.5. In summary, those who responded:
- Highlighted a lack of consistency in applying the criteria
  - Agreed that the settlement boundary should follow clearly defined physical features but wanted it to be more clearly shown whether they are inside or outside the line
  - Argued that the term 'functionally' should be removed because it is too simplistic/ imprecise (for example, a garage or household amenity site located several miles away from the settlement could be considered 'functionally' related if people use the facilities)

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<sup>7</sup> The maps showing the draft settlement boundaries (July 2014) are available to download from the Council's online consultation portal at [http://consult.wiltshire.gov.uk/portal/spatial\\_planning/sites\\_dpd/settlement\\_boundary\\_review\\_intial\\_and\\_informal\\_consultation](http://consult.wiltshire.gov.uk/portal/spatial_planning/sites_dpd/settlement_boundary_review_intial_and_informal_consultation).

- Wanted to protect employment land from residential development by including only residential development within the settlement boundary or, failing that, having a separate boundary for employment development
- Disagreed that the settlement boundary should include allocations, development proposals and unimplemented planning permissions (a view supported by the majority of comments on this issue)
- Disagreed that the settlement boundary should exclude large gardens and particularly objected to the line being drawn through the middle of the curtilage of properties.
- Argued that there was less opportunity to meet National Planning Policy Framework and Wiltshire Core Strategy housing targets on land within the settlement boundary because the proposed changes removed land with only minor additions. This resulted in tightly constrained settlements, excluded large gardens, protected amenity land and excluded Strategic Housing Land Availability Assessment sites.

## Conclusions

- 6.6. The targeted consultation with town and parish councils brought up several important issues, summarised above and discussed in more detail in the next chapter.
- 6.7. The Consultation Statement that accompanies the Plan contains further details about the consultation and the feedback, including comments in full and officer responses<sup>8</sup>.

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<sup>8</sup> Wiltshire Council (June 2017). Wiltshire Housing Sites Allocations Plan Consultation Statement. Annex B: Report on the Informal Consultation with Town and Parish Councils on Draft Proposals for Amending Settlement Boundaries.



## Chapter 7: Feedback from the informal consultation with town and parish councils

- 7.1. This chapter identifies and gives further consideration to the main issues that have come out of feedback from the consultation. It then sets out how each of these issues will be addressed in developing a revised settlement boundary review methodology. Finally, the chapter summarises the changes to the method and provides a comparison with the draft settlement boundary review methodology.

### Overview

- 7.2. Those who responded to the consultation commented on the relationship between the settlement boundary and:
- Physical features on the ground
  - Different types of development
  - Planning permissions
  - Sites allocated for development in the local plan
  - The curtilage of properties, including large gardens, and
  - Recreational or amenity space at the edge of settlements
- 7.3. Many also commented on the relationship between the settlement boundary review and the neighbourhood planning process.
- 7.4. Each of these issues will be considered separately in more detail below.

### Physical features on the ground

- 7.5. The draft settlement boundary review methodology stated that:

*“Where practical, the draft settlement boundaries follow clearly defined physical features, such as, walls, fences, hedgerows, roads and water courses in order to define the built area of the settlement.”*

- 7.6. Those who responded agreed that the settlement boundary should follow clearly defined physical features. However, they wanted it to be more clearly shown whether they are inside or outside the line. Other minor points raised by consultation feedback included replacing the phrase ‘where practical’ with ‘where practicable’, which is grammatically correct in this context, and ‘built area’ with ‘built form’.

### Conclusion

- 7.7. There was no disagreement with the general approach in this section. The points raised here essentially relate to issues of clarification and consistency. Therefore, the revised settlement boundary review methodology will make it clear that the settlement boundary will follow but not include clearly defined physical features. This will be reflected in revisions to the maps. Further changes to wording and sentence structure will be made in respect of the minor grammatical points raised in order to aid clarity and understanding.

### **Different types of development**

- 7.8. The draft settlement boundary review methodology includes:

- Residential, employment and community facility uses, such as religious buildings, schools and community halls, which are physically/functionally related to the settlement

- 7.9. It excludes:

- Isolated development that is physically or visually detached from the settlement (including farm buildings or agricultural buildings, renewable energy installations)

- 7.10. Some of those who responded disagreed with the inclusion of employment land within the settlement boundary. They argued that employment land needs to be protected from residential development. Other minor points raised by consultation feedback related to some of the terms used in this part of the methodology. The term 'functionally related' was considered too imprecise. For example, a garage and a household amenity site might be located several miles away from the settlement. However, they could be said to be functionally related to a settlement if people used these facilities. Also, the term 'visually detached' was considered to be used interchangeable with 'physically' and 'functionally' throughout the methodology.

### *Conclusion*

- 7.11. There was less agreement on the general approach in this section, specifically in relation to the inclusion of employment land within the settlement boundary. This perhaps reflects the evolution of the draft settlement boundary review methodology from four different approaches in the former district local plans. Not all of the former district local plans included employment land within their settlement boundaries. There is also a desire to protect employment land from residential conversion. However, Core Policy 35 of the Wiltshire Core Strategy ('the WCS') protects employment land from residential development. Yet, the protection under Core Policy 35 only extends to principal settlements, market towns and local service centres. Employment land in large villages is not protected by Core Policy 35. Neither is employment land protected in small



villages but small villages do not have settlement boundaries. There is then a need to address the omission of large villages from Core Policy 35 and concerns raised during consultation feedback. This does not mean that employment land should be excluded from settlement boundaries in all types of settlement.

Therefore, the revised settlement boundary review methodology will exclude employment development at the edge of large villages. Further wording changes, such as removing the term ‘functionally related’ and consistent use of ‘physically’ in place of ‘visually’ or ‘functionally’, would aid clarity.

### **Planning permission**

7.12. The draft settlement boundary review methodology includes:

- Extant planning permissions

7.13. Many of those who responded disagreed with the inclusion of unimplemented planning permissions within the settlement boundary. They argued that many planning permissions never get built out and that the final built form may differ substantially from the original permission.

### *Conclusion*

7.14. The role of a settlement boundary is to define the built form of the settlement. Unimplemented planning permissions, by definition, have yet to be built and, therefore, do not form part of the built environment. Until they are built, there is still a degree of uncertainty over the exact layout of the urban form. Indeed, they may not be built out at all. However, for those planning permissions where development has commenced, there is a much greater certainty over the final built form of the development. Therefore, the revised settlement boundary review methodology will include within the settlement boundary built or commenced planning permissions but exclude all unimplemented planning permissions. Nevertheless, it is recognised that settlement boundaries represent a snapshot in time. Unimplemented planning permissions subsequently built out can be included within a future review.

### **Sites allocated for development in the local plan**

7.15. The draft settlement boundary review methodology includes:

- Site allocations identified in the development plan

7.16. Many of those who responded disagreed with the inclusion of site allocations within the settlement boundary. Their reasoning being similar to that behind their opposition to the inclusion of unimplemented planning permissions.

### *Conclusion*

7.17. Again, the purpose of the settlement boundary is to define the built form of a settlement. There is likely to be uncertainty over how much space within the red line on a site plan drawing is taken up by the built form. Therefore, the revised settlement boundary review methodology will exclude site allocations identified in the development plan.

### **The curtilage of properties, including large gardens**

7.18. The draft settlement boundary review methodology excludes:

- The curtilages of properties that have the capacity to extend the built form of the development. This includes large gardens.

7.19. Those who responded strongly disagreed with the exclusion of large gardens from within settlement boundaries. There was also opposition to the settlement boundary being drawn arbitrarily through the middle of gardens, effectively bisecting the curtilage of the property. In some cases, the settlement boundary had been drawn touching or even through the actual property.

### *Conclusion*

7.20. There needs to be a balance between tightly constraining growth and substantially extending the built form of settlements. Some parts of the curtilage of properties relate more closely to the built environment, such as gardens. Others relate more closely to the open countryside, such as fields or paddocks. However, the inclusion of some gardens within the settlement boundary could substantially extend the built form of the settlement. Whether this could happen depends upon the size of the garden and the location, i.e. its scale in relation to its immediate surroundings. It would be impractical to specify a size limitation as this may not be appropriate for all settlements. There is a need for a subtle and flexible approach. One that takes into account differences between settlements and consultation feedback and balances the need to control development with allowing for the growth of settlements. Therefore, the revised settlement boundary review methodology will include the curtilage of a property that relates more closely to the built environment, e.g. a garden), or has limited capacity to extend the built form of the settlement in terms of scale and location. However, it will exclude the curtilage of a property that relates more closely to the open countryside, e.g. a field or a paddock, or has the capacity to substantially extend the built form of the settlement in terms of scale and location.

### **Recreational or amenity space at the edge of settlements**

7.21. The draft settlement boundary review methodology excludes:

- Recreational or amenity space at the edge of settlements that primarily relate to the countryside (in form or nature)



- 7.22. Consultation feedback opposed the exclusion of small parcels of open land on the edge of settlements. Many of these had previously been included within the settlement boundary. The draft methodology drew concerns about unnecessarily tightening settlement boundaries and restricting reasonable development opportunities on unused or infill land. Some argued that removing land within the existing boundary and tightly constraining settlements meant less opportunity to meet National Planning Policy Framework and WCS housing targets.

### *Conclusion*

- 7.23. Again, there need to be a balance between tightly constraining growth and substantially extending the built form of settlements. Some recreational or amenity spaces at the edge of settlements relate more closely to the built environment. Others relate more closely to the open countryside. The inclusion within the boundary of some recreational or amenity spaces at the edge of settlements could substantially extend the built form of the settlement. Whether this could happen depends upon the size of the recreational or amenity space and its relationship to its immediate surroundings. It would be impractical to specify a size limitation as this may not be appropriate for all settlements. There is a need for a subtle and more flexible approach. One that takes into account differences between settlements and consultation feedback and balances the need to control development with allowing for the growth of settlements. Therefore, the revised settlement boundary review methodology will include recreational or amenity spaces that relate more closely to the built environment. However, it will exclude those which relate more closely to the open countryside. Nevertheless, it is recognised that these decisions will often be a matter of officer judgement that depends on the individual circumstances.

### **Relationship with neighbourhood planning**

- 7.24. The informal consultation asked town and parish councils whether they have, or were intending to review settlement boundaries as part of their neighbourhood plan. The information sought included that on any work they had undertaken and the timetable for their neighbourhood plan.
- 7.25. Consultation responses from town and parish councils requested clarification on the relationship between neighbourhood plans and the Plan. Some commented on the need for settlement boundaries in neighbourhood plans to take precedence. They also suggested the Council should confirm that the settlement boundaries in the Plan could be subject to further change arising from subsequent neighbourhood plans.

## Conclusion

- 7.26. Paragraphs 4.13 and 4.15 of the WCS support the review of settlement boundaries through the Plan or through neighbourhood plans<sup>9</sup>. Therefore, where a neighbourhood plan has been considered to have reviewed the settlement boundary and is at a sufficiently advanced stage, then the Council considers it unnecessary to duplicate this work by reviewing the relevant settlement boundary in the Plan. However, updates may be appropriate to reflect planning permissions that have been implemented since the boundary was reviewed. The position up to 1 April 2016 has been taken into account in the preparation of the Plan to reflect the latest monitoring data.
- 7.27. Neighbourhood plans will be considered to have reviewed their settlement boundaries where this issue has been explicitly addressed through the neighbourhood plan process, even if the eventual outcome is to retain the existing settlement boundary. Generally, when a neighbourhood plan submitted to the Council has reviewed a settlement boundary and proposes amendments, this Plan does not carry out a second review of the boundaries<sup>10</sup>. The community area topic papers will highlight those settlements where the settlement boundary is considered to have been reviewed by a sufficiently advanced neighbourhood plan.
- 7.28. However, for settlements where the neighbourhood plan is not considered to have reviewed their boundary, or where there is no neighbourhood plan or one at an early stage, then the settlement boundary will be reviewed through the Plan.
- 7.29. Neighbourhood plans submitted subsequently will still be able to consider their own settlement boundary through the neighbourhood planning process. Once a future neighbourhood plan is 'made', its settlement boundaries will then supersede those in the Plan.

## Summary

- 7.30. *Table 9.1* summarises the changes and compares them with the draft methodology. These have resulted from identifying and considering the issues espoused in feedback from the informal consultation with town and parish councils and further officer review.

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<sup>9</sup> The settlement boundary for Chippenham has been reviewed separately through the Chippenham Site Allocations Plan.

<sup>10</sup> Formal submission takes place under Regulation 16 of the Neighbourhood Planning Regulations 2011 (As amended).



Criteria	Draft methodology	Revised methodology
<b>Physical features on the ground</b>	<i>Where practical, the draft settlement boundaries follow clearly defined physical features, such as, walls, fences, hedgerows, roads and water courses in order to define the built area of the settlement.</i>	<b><i>The settlement boundaries define the built form of the settlement by, where practicable, following but not including clearly defined physical features, such as walls, fences, hedgerows, roads and water courses.</i></b>
<b>Different types of development</b>	<u>Includes:</u> <i>Residential, employment and community facility uses, such as religious buildings, schools and community halls, which are physically/ functionally related to the settlement</i>	<u>Includes:</u> <b><i>Residential and community facilities development, such as religious buildings, schools and community halls, that is physically related to the settlement</i></b>  <b><i>Employment development in principal settlements, market towns and local service centres<sup>11</sup> that is physically related to the settlement</i></b>
	<u>Excludes:</u> <i>Isolated development that is physically or visually detached from the settlement (including farm buildings or agricultural buildings, renewable energy installations)</i>	<u>Excludes:</u> <b><i>Employment development, farm buildings and farmyards, at the edge of large villages<sup>1</sup></i></b>  <b><i>Isolated development that is physically detached from the settlement (including farm buildings or agricultural buildings and renewable energy installations)</i></b>
<b>Planning permission</b>	<u>Includes:</u> <i>Built and extant planning permissions</i>	<u>Includes:</u> <b><i>Built and commenced planning permissions</i></b>
		<u>Excludes:</u> <b><i>All types of unimplemented planning permissions</i></b>

<sup>11</sup> As defined in Core Policy 1 Settlement Strategy in the adopted Wiltshire Core Strategy (January 2015).

<b>Criteria</b>	<b>Draft methodology</b>	<b>Revised methodology</b>
<b>Sites allocated for development in the local plan</b>	<u>Includes:</u> <i>Site allocations identified in the development plan</i>	
		<u>Excludes:</u> <b>Site allocations</b>
<b>The curtilage of properties, including large gardens</b>	<u>Includes:</u>	<u>Includes:</u> <b>The curtilage of a property that relates more closely to the built environment (e.g. a garden) or has limited capacity to extend the built form of the settlement in terms of scale and location</b>
	<u>Excludes:</u> <i>The curtilages of properties that have the capacity to extend the built form of the development. This includes large gardens.</i>	<u>Excludes:</u> <b>The curtilage of a property that relates more closely to the open countryside (e.g. a field or paddock) or has the capacity to substantially extend the built form of the settlement in terms of scale and location</b>
<b>Recreational or amenity space at the edge of settlements</b>	<u>Includes:</u>	<u>Includes:</u> <b>Recreational or amenity space at the edge of a settlement that relates more closely to the built environment</b>
	<u>Excludes:</u> <i>Recreational or amenity space at the edge of settlements that primarily relate to the countryside (in form or nature)</i>	<u>Excludes:</u> <b>Recreational or amenity space at the edge of the settlement that relates more closely to the open countryside</b>

Table 7.1 – Comparison between draft and revised settlement boundary methodologies

7.31. The Plan will not review the settlement boundary of settlements where it is already considered to have been reviewed by a sufficiently advanced neighbourhood plan. Should a subsequent neighbourhood planning process review a settlement boundary then it can decide whether to keep the boundary in the Plan, or develop and consult upon its own, bespoke boundary.





## Chapter 8: The revised settlement boundary review methodology

8.1. This chapter sets out the revised settlement boundary review methodology, which resulted from consultation feedback and further officer review.

### The revised settlement boundary review methodology

8.2. *Table 8.1* sets out the revised settlement boundary review methodology.

<b>The revised settlement boundary review methodology</b>	
<b>The settlement boundaries define the built form of the settlement by, where practicable, following but not including clearly defined physical features, such as walls, fences, hedgerows, roads and water courses.</b>	
<b>Areas which have been included are:</b>	<ul style="list-style-type: none"> <li>• Built and commenced residential and community facilities development such as religious buildings schools and community halls, that is physically related to the settlement</li> <li>• Built and commenced employment development in principal settlements, market towns and local service centres<sup>12</sup> that is physically related to the settlement</li> <li>• The curtilage of a property that relates more closely to the built environment (e.g. a garden) or has limited capacity to extend the built form of the settlement in terms of scale and location</li> <li>• Recreational or amenity space at the edge of a settlement that relates more closely to the built environment</li> </ul>
<b>Areas which have been excluded are:</b>	<ul style="list-style-type: none"> <li>• Employment development, farm buildings and farmyards, at the edge of large villages</li> <li>• Isolated development that is physically detached from the settlement (including farm buildings or agricultural buildings and renewable energy installations)</li> <li>• The extended curtilage of a property that relates more closely to the open countryside (e.g. a field or paddock) or has the capacity to substantially extend the built form of the settlement in terms of scale and location</li> <li>• Recreational or amenity space at the edge of the settlement that relates more closely to the open countryside</li> <li>• All types of unimplemented planning permission</li> <li>• Site allocations</li> </ul>

**Table 8.1 – the revised settlement boundary review methodology**

<sup>12</sup> As defined in Core Policy 1 Settlement Strategy in the adopted Wiltshire Core Strategy (January 2015)

### **Undertaking the review of settlement boundaries**

- 8.3. The Council undertook a desktop review of each boundary using geographical information system (GIS) data sets, including aerial imagery and ordnance survey maps. The desktop review produced a revised boundary that followed the methodology above but also considered consultation responses received in regards to specific locations.
- 8.4. It was recognised that a desktop review alone may not necessarily take into account the detail and most recent changes on the ground. Therefore, following the desktop assessment, planning officers with relevant local knowledge were consulted on the maps produced for each settlement. They have more detailed, up to date local knowledge of the area they cover. It was considered that they would be able to provide further critical assessment of the proposed boundary. Feedback from planning officers was then taken into account and any final revisions to the boundary maps were made.

### **The proposed changes to settlement boundaries**

- 8.5. Each community area topic paper supporting the Wiltshire Housing Site Allocations Plan contains OS maps showing settlement boundaries where they are proposed for review. The maps show both the existing settlement boundary, as set out in the Wiltshire Core Strategy Policies Map or where relevant neighbourhood plan, and the revised settlement boundary for comparison. A schedule and justification of the main changes from the existing settlement boundary are also provided alongside the maps.

## Appendix A – Amended Settlement Boundaries

### East Wiltshire Housing Market Area (HMA): Amended Settlement Boundaries

Community Area	Settlement Boundaries reviewed by the Wiltshire Housing Site Allocations Plan	Settlement Boundaries not reviewed because of Neighbourhood Plans
<b>Devizes</b>		
	Devizes*	Devizes*
	Bromham	Potterne
	Market Lavington	Urchfont
	Rowde	
	West Lavington and Littleton Panell	
	Worton	
<b>Marlborough</b>		
	Aldbourn	
	Baydon	
	Broad Hinton	
	Marlborough	
	Ramsbury	
<b>Tidworth and Ludgershall</b>		
	Collingbourne Ducis	
	Ludgershall	
	Netheravon	
	Tidworth	
<b>Pewsey</b>		
	Burbage	Pewsey
	Great Bedwyn	
	Shalbourne	
	Upavon	

\* Devizes has a made Neighbourhood Plan which has reviewed its settlement boundary. The Devizes Neighbourhood Plan had the intention of including its site allocations within its settlement boundary however one allocation was omitted in error. Wiltshire Council has not conducted a wholesale review of the settlement boundary of Devizes however it does include the site omitted from the boundary in error in the Neighbourhood Plan.

### North and West Wiltshire Housing Market Area (HMA): Amended Settlement Boundaries

Community Area	Settlement Boundaries reviewed by the Wiltshire Housing Site Allocations Plan	Settlement Boundaries not reviewed because of Neighbourhood Plans
<b>Bradford on Avon</b>		
	Westwood	Bradford on Avon
	Winsley	Holt



Community Area	Settlement Boundaries reviewed by the Wiltshire Housing Site Allocations Plan	Settlement Boundaries not reviewed because of Neighbourhood Plans
<b>Calne</b>		
	Calne	
	Studley and Derry Hill	
<b>Chippenham<sup>13</sup></b>		
	Christian Malford	
	Hullavington	
	Kington St Michael	
	Sutton Benger	
	Yatton Keynell	
<b>Corsham</b>		
	Box	
	Colerne	
	Corsham	
	Rudloe	
<b>Malmesbury</b>		
	Malmesbury	Great Somerford
	Ashton Keynes	
	Crudwell	
	Oaksey	
	Sherston	
<b>Melksham</b>		
	Atworth	
	Melksham and Bowerhill	
	Seend	
	Semington	
	Shaw and Whitley	
	Steeple Ashton	
<b>Royal Wootton Bassett and Cricklade</b>		
	Cricklade	
	Lyneham	
	Purton	
	Royal Wootton Bassett	
<b>Trowbridge</b>		
	Hilperton	
	North Bradley	
	Southwick	
	Trowbridge	
<b>Warminster</b>		
	Chapmanslade	
	Codford	

<sup>13</sup> The settlement boundary for the town of Chippenham has been reviewed by the Chippenham Site Allocations Plan.

Community Area	Settlement Boundaries reviewed by the Wiltshire Housing Site Allocations Plan	Settlement Boundaries not reviewed because of Neighbourhood Plans
	Corsley	
	Heytesbury	
	Sutton Veny	
	Warminster	
<b>Westbury</b>		
	Bratton	
	Dilton Marsh	
	Westbury	

**South Wiltshire Housing Market Area (HMA): Amended Settlement Boundaries**

Community Area	Settlement Boundaries reviewed by the Wiltshire Housing Site Allocations Plan	Settlement Boundaries not reviewed because of Neighbourhood Plans
<b>Amesbury, Bulford and Durrington</b>		
	Amesbury	Porton (Idmiston NP)
	Bulford	
	Durrington	
	Great Wishford	
	Shrewton	
	The Winterbournes	
	Tilshead	
<b>Mere</b>		
	Mere	
<b>Salisbury</b>		
	Salisbury	
<b>Southern Wiltshire</b>		
	Alderbury	
	Combe Bissett	
	Downton	
	Morgan Vale and Woodfalls	
	Pitton	
	Whiteparish	
	Winterslow	
<b>Tisbury</b>		
	Fovant	
	Hindon	
	Ludwell	
	Tisbury	

<b>Wilton</b>		
	Broad Chalke	
	Dinton	
	Wilton	

For settlement boundaries reviewed by the Wiltshire Housing Site Allocations Plan, the Community Area Topic Papers include maps showing previous and amended boundaries for settlements in each HMA. Each map is accompanied by a table of changes from the current adopted boundary.



## **APPENDIX 3**

# **Wiltshire Housing Site Allocations Plan**

## **Topic Paper 2: Site Selection Process Methodology**

June 2017



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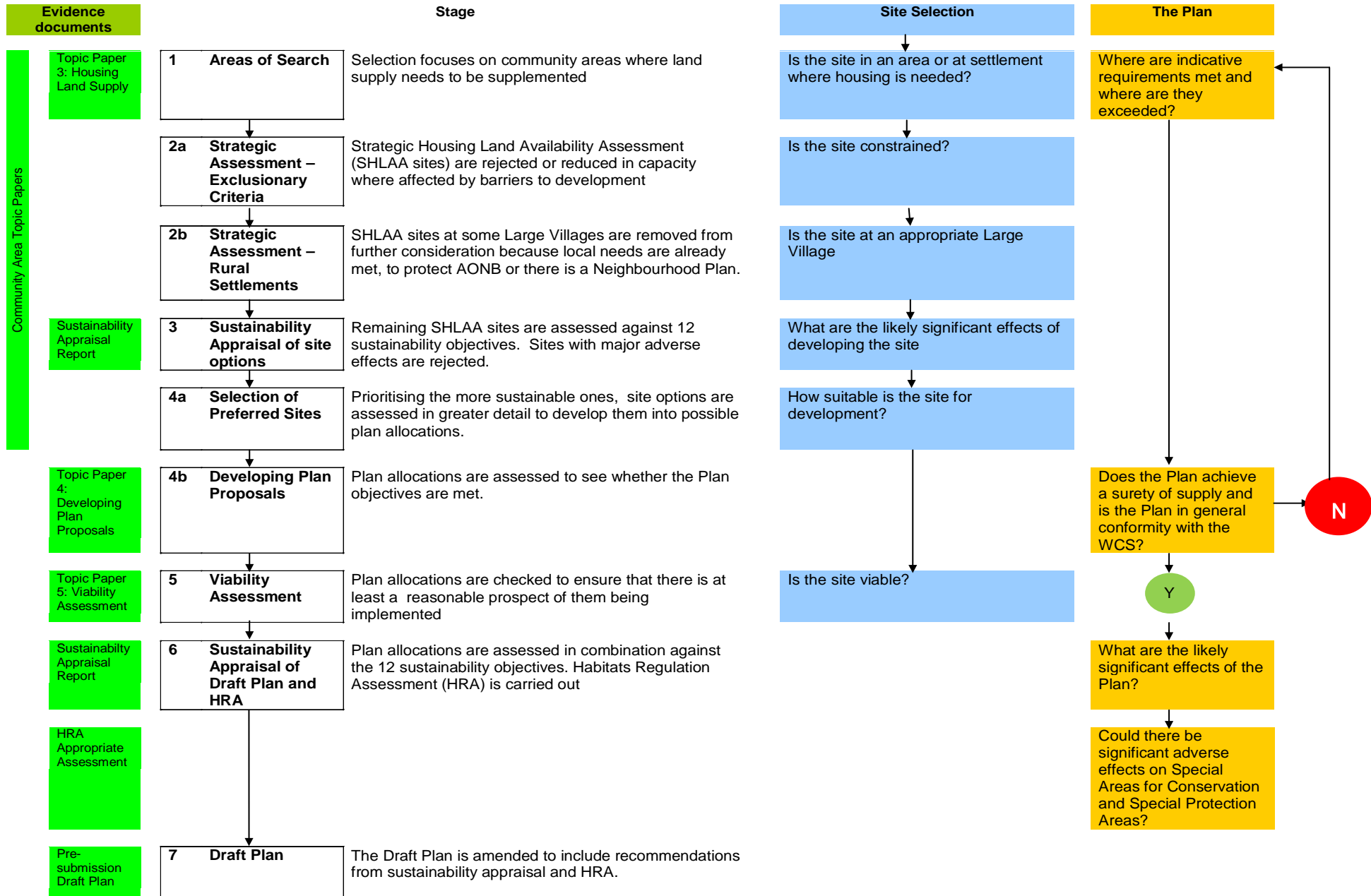


The Draft Plan has been published supported by the following Topic Papers:

Document	Purpose
Community Area Topic Papers	<p>Reports on stages 1 to 4a of the site selection process for each community area, including a summary of relevant outputs from stage 3.</p> <p>Reports on the process and outcome of settlement boundary review for each community area settlement</p>
Topic Paper 1: Settlement Boundary Review Methodology	Explains the process followed to review settlement boundaries and how it was developed
Topic Paper 2: Site Selection Process Methodology	Explains the process followed to select preferred sites and produce plan proposals
Topic Paper 3 : Housing land Supply	Provides the quantitative evidence for housing land requirements
Topic Paper 4 : Developing Plan Proposals	Reports on how preferred sites affect housing land supply for each Housing Market Area in terms of meeting WCS requirements and the spatial strategy
Topic Paper 5 : Assessment of Viability	Tests the ability of sites to be developed, provide policy compliant levels of affordable housing and necessary infrastructure

## Executive Summary

Stage		
1	Areas of Search	Site selection focuses on community areas where housing land supply needs to be supplemented in order to meet WCS indicative levels of housing development for 2006 - 2026
2a	Strategic Assessment – Exclusionary Criteria	<p>Land promoted for development is recorded in Strategic Housing Land Availability Assessment (SHLAA sites). These represent the pool of possibilities for Plan proposals.</p> <p>SHLAA sites are rejected from further consideration or their capacity reduced where affected by obstacles to development such as heritage and wildlife designations and flood plain, or because the site is already a commitment for development or located in the built up area.</p>
2b	Strategic Assessment – Rural Settlements	SHLAA sites at some Large Villages are removed from further consideration because previous and committed development already meets those villages local needs, they are in AONB and alternatives are available or a Neighbourhood Plan for the settlement has already reached an advanced stage.
3	Sustainability Appraisal of site options	Remaining SHLAA sites are assessed against 12 sustainability objectives. Sites with major adverse effects are rejected. Other sites are divided into 'more' or 'less' sustainable site options.
4a	Selection of Preferred Sites	The suitability of site options, prioritising the more sustainable ones, is assessed in greater detail to develop them into possible plan allocations. They are checked to be sure they fit with WCS strategy and preferred sites are selected.
4b	Developing Plan Proposals	The total contribution of all the preferred sites to each Housing Market Area is assessed in terms of overall land supply and whether Plan objectives are met. The selection of preferred sites is amended if necessary and confirmed as Plan proposal.
5	Viability Assessment	Plan proposals are checked to ensure that there is at least a reasonable prospect of them being implemented
6	Sustainability Appraisal of Draft Plan and HRA screening	<p>A draft Plan is prepared containing the Plan proposals and their likely significant effects are assessed in combination against the 12 sustainability objectives.</p> <p>The Plan is 'screened' under the Habitats Regulations as to whether the draft Plan will result in significant adverse effects upon designated sites. As a consequence, an appropriate assessment is carried out and mitigation measures proposed.</p>
7	Draft Plan	The Draft Plan is amended to include recommendations from sustainability appraisal and HRA screening.





## **1. Introduction**

1.1 The purpose of the Wiltshire Housing Site Allocations Plan ('the Plan') is established in the Wiltshire Core Strategy (WCS) to:

- Revise, where necessary, settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns, Local Service Centres and Large Villages; and
- Allocate new sites for housing to ensure the delivery of homes across the plan period in order to maintain a five year land supply in each of Wiltshire's three HMAs over the period to 2026.

### **Settlement Boundary Review**

1.2 The Council did not review the extent of the boundaries to inform the WCS and relied upon the former district local plans. They would instead be reviewed as a part of preparing this Plan (paragraph 4.13 of the WCS).

1.3 Consequently, the Council has undertaken a comprehensive review of the boundaries to ensure they are up-to-date and adequately reflect changes which have happened since they were first established. The Plan amends settlement boundaries where necessary. It is also the prerogative of local communities to review them through the preparation of neighbourhood plans.

1.4 A separate methodology topic paper explains the review process and how it was developed<sup>1</sup>.

### **The Site Selection Process**

1.5 The WCS refers to the role of this Plan, in combination with the Chippenham Site Allocations Plan, to help ensure a sufficient choice and supply of suitable sites throughout the plan period in accordance with national policy and to compliment Neighbourhood Planning.

1.6 The WCS disaggregates the scale of housing required over the plan period to three separate Housing Market Areas (HMAs) shown below (East, North and West and South). The National Planning Policy Framework (NPPF) requires that each Local Planning Authority demonstrates that there is five years supply of deliverable of land for housing development for each HMA based on the implied delivery rates of the WCS requirement. Fluctuations can occur in the delivery of housing but a central objective of the Plan, ensuring surety of supply, is to sustain a 'five year housing land supply' over the remainder of the plan period to 2026.

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<sup>1</sup> Topic Paper 1: Wiltshire Housing Site Allocations Plan - Settlement Boundary Review Methodology

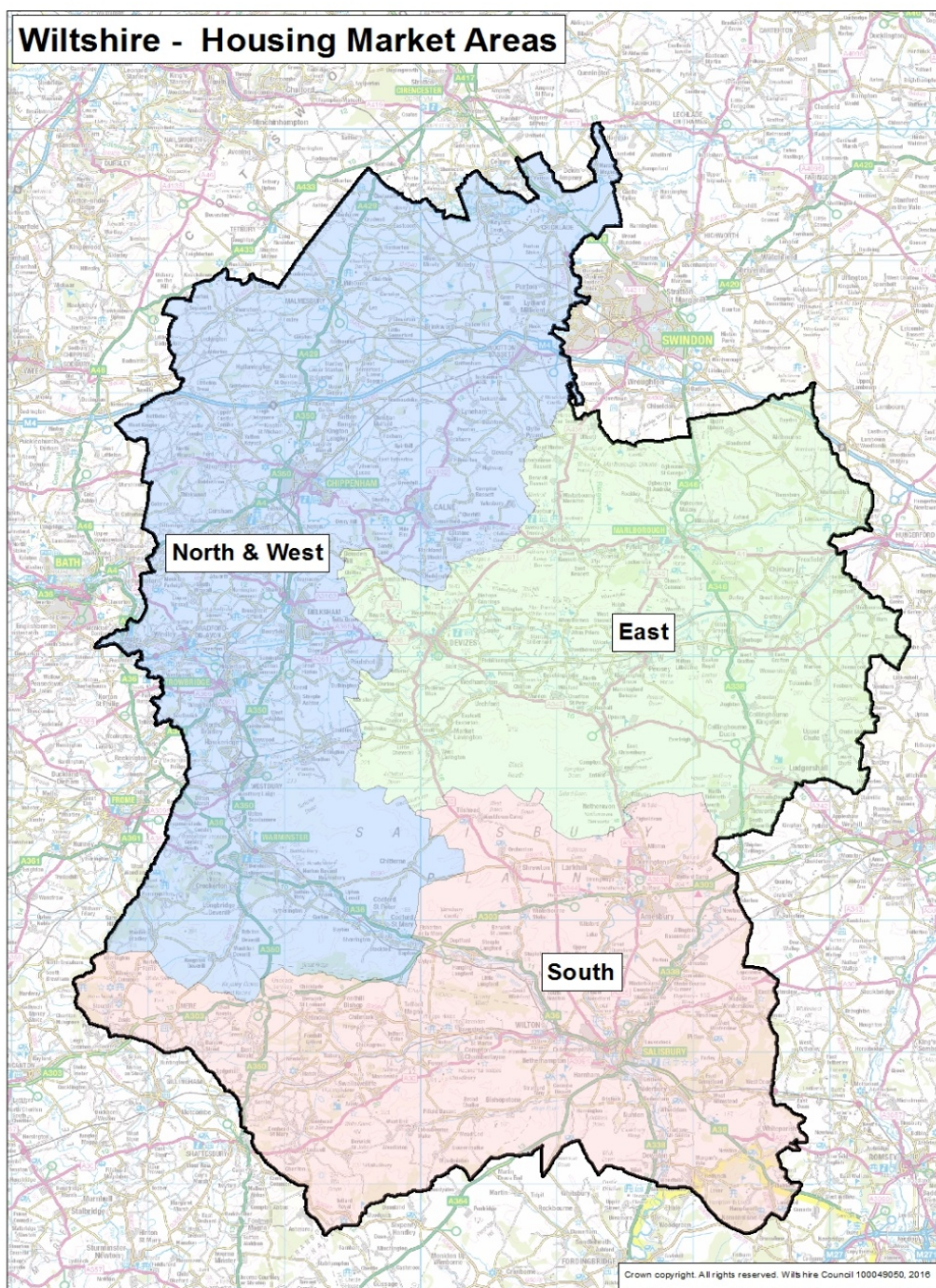


Figure 1: Wiltshire Housing Market Areas

- 1.7 The WCS also defines a hierarchy of settlements within the County and disaggregates indicative levels of housing to each Community Area and includes indicative requirements for the Principal Settlements, Market Towns and in the South Wiltshire HMA, the Local Service Centres and their surrounding community areas<sup>2</sup>. This distribution of development directs the majority of development to these main settlements and promotes a sustainable pattern of development. The Plan's

<sup>2</sup> Paragraph 4.26 and Table 1, WCS

allocations focus on those settlements and areas where land supply falls short of the indicative levels. In so doing it helps to deliver the WCS spatial strategy.

- 1.8 This document sets out the methodology for identifying suitable sites for housing development in accordance with the settlement strategy and housing market areas established in the WCS.

### Context

- 1.9 The WCS contains a settlement strategy for managing growth over the period up to 2026. The strategy establishes tiers of settlements based on an understanding of their role and function; and how they relate to their immediate communities and wider hinterland.

- 1.10 Core Policy 1 of the Core Strategy identifies four categories of settlements, namely:

- Principal Settlements
- Market Towns
- Local Service Centres
- Large and Small Villages

- 1.11 Except small villages each of these settlements has a “settlement boundary”. In simple terms, they are the dividing line, or boundary between areas of built/ urban development (the settlement) and non-urban or rural development – the countryside. In general, development within the settlement boundary is, in principle, acceptable, whereas development outside the settlement boundary is, with limited exceptions, unacceptable. The WCS uses settlement boundaries as a policy tool for managing how development should take place.

- 1.12 The table below sets out the relationship between each settlement’s role within the settlement strategy and the expected level of development under Core Policy 1.

Settlement	Level of development
Principal Settlement	The primary focus for development and will provide significant levels of jobs and homes
Market Town	Have the potential for significant development that will increase the number of jobs and homes to help sustain/ enhance services and facilities and promote self-containment and sustainable communities
Local Service Centre	Modest levels of development to safeguard their role and deliver affordable housing
Large village	Development limited to that need to help meet the housing needs of settlements and improve housing opportunities, services and facilities
Small village	Some modest development may be appropriate to respond to local needs and



Settlement	Level of development
	contribute to the vitality of rural communities but limited to infill

**Table 1 : Settlement Levels of Development**

- 1.13 Core Policy 2 of the WCS also proposes a minimum housing requirement for each HMA as follows:

Housing Market Area (HMA)	Minimum housing requirement (dwellings)
East Wiltshire	5,940
North and West Wiltshire	24,740
South Wiltshire	10,420

**Table 2: Housing Market Areas Housing Requirements**

- 1.14 Table 1 and the Area Strategy Policies of the WCS provide indicative housing requirements for settlements, community area remainders and community areas.

Area	Indicative requirement 2006-2026
Devizes	2,010
Devizes CA remainder	490
Devizes CA Total	2,500
Marlborough	680
Marlborough CA remainder	240
Marlborough CA Total	920
Pewsey CA Total	600
Tidworth and Ludgershall	1,750
Tidworth CA remainder	170
Tidworth CA Total	1,920
<b>EAST WILTSHIRE HMA</b>	<b>5,940</b>
Bradford on Avon	595
Bradford on Avon CA remainder	185
Bradford on Avon CA Total	780
Calne	1,440
Calne CA remainder	165
Calne CA Total	1,605
Chippenham	4,510
Chippenham CA remainder	580
Chippenham CA Total	5,090
Corsham	1,220
Corsham CA remainder	175
Corsham CA Total	1,395

Area	Indicative requirement 2006-2026
Malmesbury	885
Malmesbury CA remainder	510
Malmesbury CA Total	1,395
Melksham and Bowerhill	2,240
Melksham CA remainder	130
Melksham CA Total	2,370
Royal Wootton Bassett	1,070
Royal Wootton Bassett and Cricklade CA remainder <sup>3</sup>	385
Royal Wootton Bassett and Cricklade CA <sup>5</sup> Total	1,455
Trowbridge	6,810
Trowbridge CA remainder	165
Trowbridge CA Total	6,975
Warminster	1,920
Warminster CA remainder	140
Warminster CA Total	2,060
Westbury	1,500
Westbury CA remainder	115
Westbury CA Total	1,615
<b>NORTH &amp; WEST WILTSHIRE HMA</b>	<b>24,740</b>
Amesbury, Bulford and Durrington	2,440
Amesbury CA remainder	345
Amesbury CA Total	2,785
Mere	235
Mere CA remainder	50
Mere CA Total	285
Salisbury	6,060
Wilton	
Wilton CA remainder	255
Salisbury and Wilton CAs Total	6,315
Downton	190
Southern Wiltshire CA remainder	425
Southern Wiltshire CA Total	615

<sup>3</sup> Totals for Royal Wootton Bassett & Cricklade CA remainder and Royal Wootton Bassett & Cricklade CA exclude any development at the West of Swindon.

Area	Indicative requirement 2006-2026
Tisbury	200
Tisbury CA remainder	220
Tisbury CA Total	420
<b>SOUTH WILTSHIRE HMA</b>	<b>10,420</b>

Table 3: Community Area Indicative Requirements

1.15 Paragraph 4.30 of the WCS makes clear however that:

*“The disaggregation to Community Areas set out above is not intended to be so prescriptive as to be inflexible and potentially ineffective in delivering the identified level of housing for each market area. It clarifies the council’s intentions in the knowledge of likely constraints in terms of market realism, infrastructure and environmental capacity. They provide a strategic context for the preparation of the Housing Sites Allocation DPD and in order to plan for appropriate infrastructure provision.”*

1.16 There are a number of sources for new homes to meet the requirements of Core Policy 2. They include:

- strategic allocations made within the WCS
- retained Local Plan allocations
- existing commitments
- regeneration projects, for example, those in Chippenham, Trowbridge and Salisbury
- neighbourhood plans
- windfall

1.17 Sites identified in the Plan supplement housing land supply providing not just an additional number of homes but improving the choice of location and house types.



## The Site Selection Process

### Plan Objectives

2.1 The Plan allocates sites for housing development to ensure enough land is allocated to help meet the minimum requirements of each housing market area. In so doing, the Plan has been prepared to achieve the following objectives:

**1. To help demonstrate a rolling five year supply of deliverable land for housing development.**

In principle, land within settlements, in particular previously developed land, is acceptable for housing redevelopment. A realistic allowance is included for this source of new housing when calculating the scale of land supply<sup>4</sup>. Within a predominantly rural area however, there is a limited amount of previously developed land. Not only are such opportunities limited, they can also be difficult to rely on as a large proportion of overall supply. The consequence is that the Plan must identify a number of sites involving the loss of countryside. As the WCS recognises it is a challenge to plan for sufficient new homes in Wiltshire<sup>5</sup>.

**2. To allocate sites at the settlements in the County that support the spatial strategy of the Wiltshire Core Strategy.**

The spatial strategy describes a hierarchy of settlements within the County. Each tier recognises the particular role of those settlements and plans a level of new housing development that is appropriate. Chippenham, Salisbury and Trowbridge, are Principal Settlements supported by a number of market towns. Designated large and small villages all serve their rural hinterlands. Local service centres have also been identified that have a more pronounced role than villages. They possess a level of facilities and services that provide the best opportunities outside the Market Towns for sustainable development.

### Stage 1: Areas of Search

*Site selection focuses on community areas where housing land supply needs to be supplemented in order to meet WCS indicative levels of housing development for 2006 – 2026*

#### *Defining ‘Areas of Search’*

3.1 The site selection methodology, as a first stage, prioritises the consideration of housing sites at those settlements and areas<sup>6</sup> where land supply needs to be supplemented in order to help meet the distribution and levels of housing provided by the WCS. These locations are termed ‘Areas of Search’.

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<sup>4</sup> See Topic Paper 2: Housing Land Supply, Wiltshire Council, (Ju I2017)

<sup>5</sup> WCS, paragraph 2.12, Wiltshire Council (Jan 2015)

<sup>6</sup> Each area strategy, for each community area in the WCS, proposes a level of housing for Principal Settlements, Market Towns and the ‘Community Area Remainder’. A level of housing is also proposed at some of the Local Service Centres designated by the WCS. For further information about the role and function of each tier of the County’s settlement hierarchy see Core Policy 1 of the WCS and its supporting text.

- 3.2 There are WCS Core Policies for each Community Area in the County. They propose a level of housing for each Principal Settlement, Market Town and some of the Local Service Centres designated by the WCS. An approximate provision is made for the remainder of the Community Area ('the Community Area remainder'). For the purposes of this Plan these levels are termed indicative requirements.
- 3.3 Initial Areas of Search are therefore Principal Settlements, Market Towns, some Local Service Centres and those Community Area remainders, where evidence suggests additional housing land is necessary to meet indicative requirements. In these areas there is a quantified need for development.
- 3.4 With regard to Community Area remainders, Core Policy 2 limits development to infill within the existing built up area at designated Small Villages. The Plan therefore does not seek to identify land for housing development at Small Villages. Instead, where a community area remainder is identified as an Area of Search, the focus of the approach to site selection is Local Service Centres (which in the North and West and East HMAs do not have a specific indicative housing requirements) and Large Villages.

#### *Neighbourhood Planning*

- 3.5 Neighbourhood Plans are an important part of the planning system. The National Planning Policy Framework (NPPF) describes their role:

*“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need. Parishes and neighbourhood forums can use neighbourhood planning to:*

*set planning policies through neighbourhood plans to determine decisions on planning applications...”<sup>7</sup>*

- 3.6 The Council supports passing direct powers over planning to local communities as a part of building up the resilience of local communities.

- 3.7 Referring to the role of Local Plans prepared by the Council the NPPF states:

*“Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:*

*the homes and jobs needed in the area ...”<sup>8</sup>*

- 3.8 It is only necessary for this Plan to allocate land for housing development where it is a strategic priority to do so. WCS Core Policy 1 proposes that development at Large Villages should be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. Unless there is a strategic priority to deliver the homes needed in an HMA, then the most appropriate means to assess local needs and plan growth at each Large Village is through the neighbourhood planning process.

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<sup>7</sup> National Planning Policy Framework, DCLG, March 2012 para 183

<sup>8</sup> National Planning Policy Framework, DCLG, March 2012 para 156

- 3.9 Topic Paper 3 explains that there is a high level of existing housing supply in the East Wiltshire HMA and unlike the two other HMAs, a forecast rolling supply 20% in excess of five years for all the remaining years of the plan period except the last. At the outset, therefore, it was considered unnecessary to allocate sites for housing development at Large Villages in this HMA. At this level of settlement, the priority should be for communities to meet local needs for housing through neighbourhood planning. Possible plan allocations were however still considered at Market Towns and the Local Service Centre where there was an indicative requirement.
- 3.10 Assessment at Stage 2b (see paragraph 4.16 below) looks separately at each Large Village within Areas of Search and the role being played by neighbourhood plans in meeting housing needs at individual settlements.

#### *Community Area Topic Papers*

- 3.11 Topic Papers have been prepared for all the Community Areas using a 2017 baseline for information on dwellings built or already committed compared to indicative requirements. They show how land supply will meet indicative housing requirements for the WCS plan period or whether fresh land for housing needs to be allocated in accordance with the remaining stages of the site selection process.
- 3.12 Plan allocations based on the 2017 baseline are the culmination of reviews of Areas of Search that have taken place whilst the Plan was being prepared. 2014 data was the first baseline. Since then, as work has progressed on the Plan, some areas have been excluded because they have met indicative requirements by a combination of dwellings built, existing allocations or land with planning consent. (Topic Paper 3 Table 1 shows how residual indicative requirements changed during the formation of the Plan.)

### **Stage 2 : Strategic Assessment**

#### *2A: Exclusionary Criteria*

*Strategic Housing Land Availability Assessment (SHLAA) sites are rejected from further consideration or their capacity reduced where affected by obstacles to development such as heritage and wildlife designations and flood plain, or because the site is already a commitment for development or located in the built up area .*

- 4.1 All councils are required to maintain a register of land that is put forward for development. This is referred to as the Strategic Housing Land Availability Assessment (SHLAA). Within Areas of Search the SHLAA provides a pool of land opportunities for possible housing development. Sites with a capacity of less than five dwellings were considered too small for inclusion in the Plan. From this pool SHLAA sites unrelated to Principal Settlements, Market Towns, Local Service Centres and Large Villages have been excluded. Those sites remaining are therefore broadly consistent with the Plan objective of making land allocations to support the WCS spatial strategy and focus development in these settlements.
- 4.2 Other land, not included in the SHLAA, may possibly be capable of development but because neither a developer nor landowner has promoted the site for development,



the site cannot be said to be available within the plan period<sup>9</sup>. It cannot be counted on to supplement housing land supply and therefore, for the Plan to be effective, land other than SHLAA sites has not been considered for inclusion.

- 4.3 SHLAA sites were therefore the basic building blocks of the Plan, but they simply amount to land put forward for development<sup>10</sup>. This does not mean any particular site is capable or suitable for development; either in part or whole.
- 4.4 For the Plan to be effective, SHLAA sites need to be suitable and capable of being built during the plan period. The availability of each SHLAA site being reviewed was also checked with its owner or promoter. The National Planning Policy Framework describes land for housing development in terms of being, 'developable', 'available' and 'suitable'.<sup>11</sup>
- 4.5 The site selection process considers their suitability to help meet housing requirements. Their suitability may be affected by a variety of different constraints. It may also be the case that SHLAA sites are not developable, for example because there is no reasonable prospect of creating a suitable vehicle access. In such circumstances, they do not represent a reasonable alternative.
- 4.6 There may be a number of barriers to development ruling out a site in whole or part: for example, SHLAA sites involving land with areas at risk of flooding or protected by a designation because of important biodiversity interests or heritage value.
- 4.7 A systematic strategic assessment has tested each SHLAA site against a number of exclusionary criteria. These were:

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<sup>9</sup> All those submitting a SHLAA site were contacted to confirm land was available for inclusion in the plan.

<sup>10</sup> The site selection process did not consider SHLAA sites that had a gross capacity of less than 5 dwellings

<sup>11</sup> Footnote 12 of the National Planning Policy Framework, DCLG, March 2012

### Exclusionary criteria

- Is the SHLAA site fully or partly a commitment? Or is the site fully or partly within a Principal Employment Area, or other existing development plan allocation? Or is the site isolated from the urban edge of the settlement i.e. not adjacent to the settlement boundary and not adjacent to a SHLAA site that is?
- Is the site fully or partly within the settlement boundary
- Is the site fully or partly within one more of the following environmental designations of biodiversity or geological value?
  - SAC
  - SPA
  - Ramsar sites
  - National Nature Reserve
  - Ancient woodland
  - SSSI
- Is the site fully or partly within green belt?
- Is the site fully or partly within flood risk areas, zones 2 or 3?
- Is the site fully or partly within areas involving any of the following internationally or nationally designated heritage asset?
  - World Heritage Site
  - Scheduled Ancient Monument
  - Historic Park and Garden
  - Registered Park and Garden
  - Registered Battlefield

Table 4: Exclusionary criteria

- 4.8 Some SHLAA sites were detached from a settlement's built up area. Greenfield development should take place in a way that expands an existing built up area in order to properly manage the growth of settlements and prevent the premature loss of open countryside.
- 4.9 SHLAA sites entirely within a settlement boundary were also excluded from the site selection process<sup>12</sup>. In principle, brownfield sites carry a presumption in favour of development and establishing an allocation for development is unnecessary. The council may grant permission in principle for housing-led development<sup>13</sup>. Important brownfield sites may also advance swiftly by more flexible development briefs or more simply through the planning application process. This different approach is often more adaptable to individual circumstance and may better deliver the higher priority accorded to developing brownfield land. In accordance with national guidance, an allowance is made for windfall development. Calculated individually for each Housing Market Area, this ensures this source of land supply is fully and properly accounted for as a part of land supply. (Allowances estimated for smaller areas, such as individual towns, are difficult to substantiate and would not be statistically valid.)

<sup>12</sup> SHLAA sites that would no longer be within the settlement boundary as a result of boundary review were treated by the site selection process as if they were already outside.

<sup>13</sup> The Town and Country Planning (Brownfield Land Register) Regulations 2017

- 4.10 SHLAA sites were rejected or reduced in capacity because one or more of the considerations in Table 4 applied to part of a site or the whole, leaving a smaller set of potential sites within Areas of Search. Each Community Area Topic Paper records all the SHLAA sites that are unaffected by exclusionary criteria, those that were rejected or their capacity reduced in size because of them. (An example extract is provided at appendix one of this paper.) Where reduced, the whole SHLAA area was still considered in later stages of the selection process but with a lower development capacity. Land, unsuited to development, yet within the control of a developer could be important to a scheme as a benefit (for example, as open space) or as a means to help mitigate harmful adverse effects of development (for example, by being used for tree planting).

#### *2B: Large villages and Local Service Centres*

*SHLAA sites at some Large Villages are removed from further consideration because previous and committed development already meets those villages local needs, they are in AONB and alternatives are available or a Neighbourhood Plan for the settlement has already reached an advanced stage..*

- 4.11 The WCS provides indicative requirements for new housing at each of the County's main settlements. It provides an approximate scale of housing development for the remainder of a community area. These areas may contain several rural settlements that do not have individually prescribed levels of development unlike Market Towns and Principal Settlements.
- 4.12 The spatial strategy requires new housing development at Large and Small Villages to be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. Some rural settlements are designated as Local Service Centres where levels of facilities and local employment suggest greater potential for growth and better self-containment.
- 4.13 Housing development at Small Villages is required to take the form purely of limited infill. House building will be small in scale, for sites of single figures and the Plan does not seek to identify sites of less than five dwellings.
- 4.14 On the other hand, all SHLAA sites at Local Service Centres were assessed since the WCS specifically identifies these settlements as more suited to growth.
- 4.15 Opportunities at some Large Villages, however, have not been explored because local housing needs for the plan period have already been accommodated; either through development that has already taken place or that is planned. Further development brought about by additional Plan allocations would exceed meeting local needs and result in conflict with WCS Core Policy 1. SHLAA sites at these Large Villages were not therefore considered reasonable alternatives.
- 4.16 Another factor was that for some large villages growth has already been thoroughly considered by Neighbourhood Plans, where these plans have advanced to a sufficient stage<sup>14</sup>. It is a priority of the Council for local communities to take direct

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<sup>14</sup> Where a Neighbourhood Plan has been publicised by the Council under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012



control over planning their settlements, as it is national policy. Alternative consideration by the Housing Site Allocations Plan would contradict that priority and conflict with policy contained in the NPPF.

- 4.17 Preparing a Neighbourhood Plan addresses the housing needs of a settlement in accordance with Core Policy 1 of the WCS. It is unnecessary for the Plan to supplement local consideration. SHLAA sites at Large Villages where Neighbourhood Plan preparation is at an advanced stage are not considered reasonable alternatives.
- 4.18 In rural areas involving Areas of Outstanding Natural Beauty (AONB), Large Villages outside the AONB are preferred locations to consider housing allocations compared to those at settlements inside the designation (provided they have not already experienced development meeting local needs and there are site options to consider). In these circumstances, consistent with national policy on AONBs<sup>15</sup>, options at Large Villages within the designation are not considered reasonable alternatives.
- 4.19 In a few cases, other reasons specific to particular Large Villages also prevented them from being considered reasonable alternatives. These instances are documented in the relevant Community Area Topic Paper and an example is included in appendix one.

### **Stage 3: Sustainability Appraisal**

*SHLAA sites are assessed against 12 sustainability objectives. Sites with major adverse effects are rejected. Other sites are divided into 'more' or 'less' sustainable site options.*

- 5.1 After a high level assessment, remaining potential sites have been assessed using sustainability appraisal. This is a transparent and systematic way of carrying out a detailed assessment of the performance of all the remaining site options using a sustainability appraisal framework.
- 5.2 The sustainability appraisal framework contains 12 objectives that cover the likely environmental, social and economic effects of development.

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<sup>15</sup> NPPF paragraphs 115-116, DCLG (Mar 2012)

### Sustainability Objectives

1. Protect and enhance all biodiversity and geological features and avoid irreversible losses
2. Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings
3. Use and manage water resources in a sustainable manner
4. Improve air quality throughout Wiltshire and minimise all sources of environmental pollution
5. Minimise our impacts on climate change and reduce our vulnerability to future climate change effects
6. Protect, maintain and enhance the historic environment
7. Conserve and enhance the character and quality of Wiltshire's rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place
8. Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures
9. Reduce poverty and deprivation and promote more inclusive and self-contained communities
10. Reduce the need to travel and promote more sustainable transport choices.
11. Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth
12. Ensure adequate provision of high quality employment land and diverse employment opportunities to meet the needs of local businesses and a changing workforce

Table 5: Sustainability Objectives

- 5.3 The performance of each site has been assessed against each of the objectives using a set of decision-aiding questions. Each option was then scored under each objective based on a generic assessment scale from major positive to a major adverse effect.

<b>Major adverse effect (---)</b>	Option likely to have a <b>major adverse</b> effect on the objective with no satisfactory mitigation possible. <b>Option may be inappropriate for mixed use development</b>
<b>Moderate adverse effect (--)</b>	Option likely to have a <b>moderate adverse</b> effect on the objective with difficult or problematic mitigation
<b>Minor adverse effect (-)</b>	Option likely to have a <b>minor adverse</b> effect on the objective because mitigation measures are achievable to reduce the significance of effects
<b>Neutral or no effect (0)</b>	On balance option likely to have a neutral effect on the objective or no effect on the objective
<b>Minor positive effect (+)</b>	Option likely to have a <b>minor positive</b> effect on the objective as enhancement of existing conditions may result
<b>Moderate positive effect (++)</b>	Option likely to have a <b>moderate positive</b> effect on the objective as it would help resolve an existing issue
<b>Major positive effect (+++)</b>	Option likely to have a <b>major positive</b> effect on the objective as it would help maximise opportunities

Note: Major and moderate adverse and positive effects are considered significant.

**Table 6: Sustainability Appraisal- Generic Assessment Scale**

- 5.4 Objectives and decision aiding questions resulted from consultation on a scoping report. The appraisal used common evidence and the process therefore ensured a transparent, consistent and equitable comparison of all reasonable alternatives.
- 5.5 Potential sites are rejected where the appraisal concludes development would result in one or more major adverse effects with no satisfactory mitigation possible.
- 5.6 The remaining potential sites in each area or settlement are compared in terms of the balance of their sustainability benefits versus adverse effects. The appraisal therefore suggests potential sites that are ‘more sustainable’, ‘less sustainable’ and rejected others. Where potential sites were rejected, the reasons for doing so are clearly stated. There is a separate draft Sustainability Appraisal Report, but each Community Area paper summarises the assessment and its recommendations.

## Stage 4: Selection of Preferred Sites and Developing Plan Proposals

### 4A: Selection of preferred sites

*The suitability of site options, prioritising the more sustainable ones, is assessed in greater detail to develop them into possible plan allocations. They are checked to be sure they fit with WCS strategy and preferred sites are selected.*

- 6.1 The site options that were identified to be taken forward from Stage 3 were analysed further. The focus for further work was the set of ‘more sustainable’ sites identified at stage 3. Further consultation with specialist consultees<sup>16</sup> helped to develop potential sites into site options with individual housing capacities and specific boundaries.

<sup>16</sup> Heritage, Landscape, Ecology, Drainage, Transport, Education, Public Protection specialists within Wiltshire Council, Highways England, Natural England and Environment Agency and Heritage England.



Consultation also helped to identify requirements that should be highlighted for individual site options, to guide the form development should take, including the definition of realistic site boundaries.

- 6.2 Stage 4a is carried out in five steps. Steps 1-4 are carried out for each of the 'more sustainable sites' recommended by the Stage 3 SA results. In exceptional circumstances it was necessary for further assessment of 'less sustainable sites'. Step 5 considers the area of search as a whole, selects and justifies the selection of preferred sites and concludes with a set of draft proposals.
- 6.3 **Step 1** transforms a SHLAA site into a possible draft proposal by a more detailed assessment of the significant effects identified in Stage 3.
- 6.4 A range of stakeholders were invited to comment on the site options. Input was particularly targeted to address likely adverse effects and mitigation predicted by sustainability appraisal (stage 3). The capacity of some sites, for example, was reduced to allow for larger areas of landscaping to mitigate potentially harmful visual impacts. In some cases, more detailed assessment revealed that adverse effects associated with the development of a site could not be adequately mitigated or were greater than expected.
- 6.5 **Step 2** assessed how well a site may contribute to the relevant area strategy for the wider community area in terms of how much it might contribute to housing requirements, deliver the vision for the area or address specific local issues.
- 6.6 **Step 3** is a further specific assessment of whether a site at a Large Village is consistent with Core Policy 1; that it would constitute growth to meet local needs, including local housing needs. This also takes note of how work on Neighbourhood Plans has progressed since first considered at stage 2 and the extent to which they may contain housing proposals of their own.
- 6.7 **Step 4** is a summary conclusion for each site with a measure of the net sustainability benefits of each site.
- 6.8 **Step 5** considered all the sites in each Area of Search together and resulted in the selection and rejection of sites. All sites that have satisfied Steps 1-3 were taken forward. This step compared the total dwellings that are provided by the pool of sites to indicative residual requirements. Where necessary, it selects and justifies site options that need to be rejected because the overall scales of development exceed that proposed by each area strategy and growth would not result in sustainable development. For example, if several site options at a large village suggest too much development, in excess of local needs, then a site may need to be rejected.
- 6.9 The result of this five step assessment were a set of draft allocations in the form of detailed site boundaries and an approximate dwelling capacity. Each Community Area Paper also identifies particular considerations connected to a given site that should be referred to by the Plan.
- 6.10 Assessments are recorded in each Community Area Paper and they use a common template of guidance (included in this paper in appendix two) and evidence sources.

#### *4B: Testing Plan Proposals*

*The total contribution of all the preferred sites to each Housing Market Area is assessed in terms of overall land supply and whether Plan objectives are met. The selection of preferred sites is amended if necessary and confirmed as Plan proposal.*

- 6.11 Previous stages assessed site options. Together the total amount of housing proposed in the Plan should aim to ensure overall supply at least meet housing market area requirements. The form housing land supply takes should also provide for a demonstrable supply of deliverable land for each year in the plan period. This step checked the degree to which this would be achieved with the additional of the sites preferred from stage 4a. It assessed the resilience of supply using several different tests.
- 6.12 This stage also checked how all the draft allocations together fitted with the spatial strategy; in terms of the overall distribution of housing growth; the approach to rural areas; and the role of Principal Settlements and Market Towns. The rationale for the Plan is to supplement housing land supply. This is a strategic priority stemming from the WCS. The spatial strategy expects development at villages to respond to local needs. It is Government and the Council's wish to give direct power to local communities to articulate their own visions for their area, to define and respond to their own local need. Therefore, where land supply can meet objectives of the Plan without allocating sites at villages then it should not. There is no strategic priority. This stage has therefore specifically reviewed the purpose and the case for making allocations at Large Villages.
- 6.13 This stage has also identified those sites in each HMA that are important to ensure supply and assessed whether the Plan would be in general conformity with the WCS. The results of this assessment are reported in a separate Topic Paper 4: Developing Plan Proposals.

## **Stage 5 Viability Assessment**

*To ensure preferred sites are viable and capable of development in accordance with national policy requirements*

- 7.1 Viability assessment has verified that preferred sites and the scale of development identified in the plan are not subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. It also shows that preferred sites are capable of providing policy compliant levels of affordable homes and that they are capable of contributing fully to the WCS target for the plan period. Assessment has been carried out by independent experts on this aspect and their report has been published separately<sup>17</sup>.

## **Stage 6: Sustainability Appraisal of Plan Proposals and Habitats Regulation Assessment**

*To draft Plan proposals and assess them against Sustainability Appraisal objectives, including in combination and cumulative effects*

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<sup>17</sup> Topic Paper 5: Viability Assessment

- 8.1 This stage of the assessment considered the impact of the Plan as whole, its cumulative effects as well as effects in combination with other plans and projects.
- 8.2 Following completion of the viability assessment, a further stage of sustainability appraisal was undertaken to assess whether further refinements were necessary to improve mitigation measures and to see that the Plan delivers the most sustainability benefits possible.
- 8.3 In terms of biodiversity, the impact of potential sites on European Designations is an important factor in the selection of preferred sites. The Plan as whole however is also required through the Habitats Directive and the Conservation of Habitats and Species Regulations 2010 (as amended), to consider if it may have a likely significant effect on European Sites either alone or in combination with other plans or projects. The assessment is published separately and shows there is sufficient mitigation. This included the identification of specific measures at individual plan allocations.

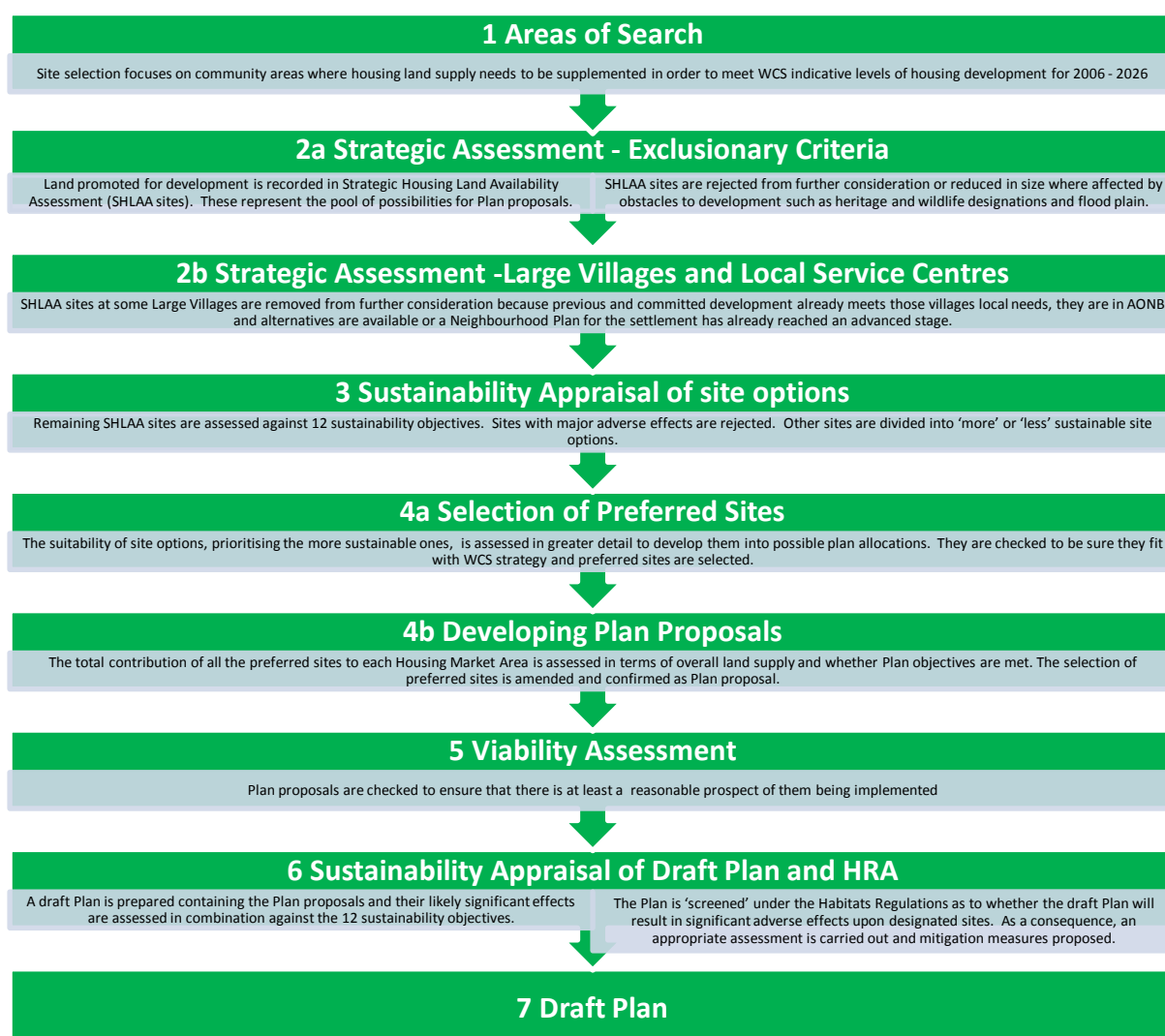


Figure 2 : Site Selection Process



**Appendix One: Stage 2 Strategic Assessment - 2B: Large villages**

Assessment Criteria		Large Villages	
		Bratton	Dilton Marsh
Have local housing needs for the Plan period already been met?	Number of dwellings in village (2006) <sup>[1]</sup>	819	509
	Housing completions (2006 – 2016) <sup>[2]</sup>	20	21
	Developable commitments (2016 – 2026)	6	1
	Proportionate growth of village (2006 – 2026)	3.2%	4.3%

<sup>[1]</sup> 2011 census data (minus housing completions 2011-2016)

<sup>[2]</sup> Note: Completions and commitments may not add up to the total for the Area of Search, as the total also includes housing development outside of the Large Villages e.g. at Small Villages and open countryside.

Assessment Criteria	Large Villages	
	Bratton	Dilton Marsh
<p><b>Have local housing needs already been considered by a sufficiently advanced neighbourhood plan?</b></p>	<p>No. There is no Neighbourhood Plan under preparation.</p> <p>In 2013, a Housing Needs Survey identified, until 2015, a need for Subsidised rented housing: Subsidised rented housing 11</p> <ul style="list-style-type: none"> <li>• 2x one bedroom homes</li> <li>• 1x two bedroom home</li> <li>• 2x three bedroom homes</li> </ul> <p>Shared / Low cost home ownership</p> <ul style="list-style-type: none"> <li>• 2x two bedroom homes</li> <li>• 1x four bedroom home</li> </ul>	<p>No. There is no Neighbourhood Plan under preparation.</p> <p>No RHNS available.</p>
<p><b>Are there any potential environmental constraints (e.g. strategic environmental/ landscape designations and heritage assets)?</b></p>	<p>Bratton does not fall within any Area of Outstanding Natural Beauty designations, but is covered by a Special Landscape Area designation which would need to be a consideration in any future developments at the village. A large part of the village is also designated within a conservation area, and there are a number of ecology designations in the village hinterland.</p>	<p>Dilton Marsh is relatively unconstrained. There are County Wildlife Sites to the south and west, connected to the village.</p>
<p><b>Are there any known strategic infrastructure constraints (e.g. education, transport and utilities)?</b></p>	<p><b>Primary school provision</b> This school has a large number of surplus places and would benefit from housing within the catchment area.</p> <p><b>Secondary school provision</b> Matravers currently has some surplus places but these are expected to fill over</p>	<p><b>Primary school provision</b> There is a primary school in the village, although the school is full and forecast to remain so, and cannot be expanded. There are also pressures on primary education capacity in Westbury, and Dilton Marsh Primary School accommodates pupils coming in from Westbury. Further</p>

Assessment Criteria		Large Villages	
		Bratton	Dilton Marsh
		<p>the next few years as housing already approved is built plus larger cohorts will begin to feed through from the primary schools. The school could be expanded when necessary.</p> <p><b>Transport</b> A regular bus service exists connecting the village with Westbury and Trowbridge.</p>	<p>development at Dilton Marsh is likely to cause an issue with primary education capacity in the area, and housing allocations should not be considered in this village until the wider primary education capacity has been addressed.</p> <p><b>Secondary school provision</b> Matravers currently has some surplus places but these are expected to fill over the next few years as housing already approved is built plus larger cohorts will begin to feed through from the primary schools. The school could be expanded when necessary.</p> <p><b>Transport</b> A regular bus service exists connecting the village with Westbury and Trowbridge.</p>
<p><b>How did the parish council respond to previous consultations on the Wiltshire Housing Sites Allocations Plan?</b></p>		<p>Bratton Parish Council have advised Wiltshire Council that SHLAA site 321 is a site with potential for building in the future bearing in mind it is in the Salisbury Plain Special Landscape Area and, as it is at the West entrance to the village, any development should be designed to present an attractive aspect both in terms of landscape and architecture to this approach.</p>	<p>The Parish Council did not respond to recent consultation on the Housing Site Allocations DPD.</p>
<p><b>Sites submitted to the Strategic</b></p>	<p><b>How many sites were submitted to</b></p>	<p>3 sites</p> <p>SHLAA sites 321, 738, 3527</p>	<p>6 sites</p> <p>SHLAA sites 175, 1008, 1009, 1038, 1043, 3270</p>



Assessment Criteria		Large Villages	
		Bratton	Dilton Marsh
Housing Land Availability Assessment	the SHLAA?		
	How many SHLAA sites do not meet the Stage 2a strategic constraints and could be taken forward for more detailed assessment (total remaining capacity <sup>18</sup> )?	<p>1 site (32 dwellings)</p> <p>SHLAA site 321</p>	<p>1 site (335 dwellings)</p> <p>SHLAA site 3270</p>
Summary and conclusions	Taking the above into account, is there any justification for removing the Large Village from further consideration in the site selection process?	<p>Bratton does not fall within any Area of Outstanding Natural Beauty designations, but is covered by a Special Landscape Area designation which would need to be a consideration in any future developments at the village. A large part of the village is also designated within a conservation area, and there are a number of ecology designations in the village hinterland. The village contains a number of facilities and services, including a primary school (with capacity), a shop/post office, places of worship, café, public house, halls,</p>	<p>Dilton Marsh is not within an Area of Outstanding Natural Beauty or other landscape designation. There are a number of ecology designations in the village hinterland. The village contains a number of facilities and services, shop, post office, place of worship, public house, recreational playing field. The village also benefits from a train station. There is a primary school in the village, although the school is full and forecast to remain so, and cannot be expanded. There are also pressures on primary education capacity in Westbury which impacts school capacity at Dilton</p>

<sup>18</sup> See Appendix 4 to this paper for the full assessment of SHLAA sites at Stage 2a of the site selection process.

Assessment Criteria		Large Villages	
		Bratton	Dilton Marsh
		recreation ground, and GP surgery. There are not considered to be any overriding constraints which would result in exclusion of sites at this village at this stage.	Marsh. Further development at Dilton Marsh is likely to cause an issue with primary education capacity in the area, and housing allocations should not be considered in this village until the wider primary education capacity has been addressed.
	<b>Conclusion:</b>	<b>TAKE FORWARD</b>	<b>REMOVE</b>

## **Appendix Two : Stage 4a: Selection of Preferred Sites - Detailed Methodology**

Work to this point has considered 'SHLAA sites'. The purpose of this stage, which involves 5 Steps, is to select those 'SHLAA sites' that can be site allocations and produce a detailed site boundary and text for each one's inclusion in the draft Plan. The starting point is that all the 'more sustainable sites' resulting from the assessment in stage 3 are capable of becoming site allocations.

For inclusion in the Plan, a site should demonstrate that it has 'net sustainability benefits' : that likely adverse effects, after taking account of mitigation measures, are outweighed by likely positive effects, once measures to maximise those benefits have also been considered. However further work may show that adverse effects actually outweigh the positive ones, or be too marginal, in which case they should be rejected.

The Sustainability Appraisal (SA) identifies likely adverse and positive effects. Stage 4a involves further work assessing only the site-specific effects (i.e. effects that are not common to most other sites) to clarify how they may be successfully mitigated or maximised. This work provides a more detailed understanding of the site, including exact boundaries and a more accurate estimate of a site's dwelling capacity. The work also involves specialist input from others, such as for landscape and heritage sustainability objectives. It also judges the overall suitability of a site looking at effects and measures in combination, for example costly mitigation measures may reduce the scope for a development to provide a policy compliant level of affordable housing. This needs to be noted. Altogether, site suitability is considered at Step 1.

A site should also fit with each area strategy contained in the Core Strategy. Some proposals may help to address issues identified in the Core Strategy but others may not. (Step 2 assesses this aspect) A 'SHLAA site' at a large village should also be consistent with Core Policy 1 of the Core Strategy. It should represent modest growth and help to support local jobs, community infrastructure and housing needs (Step 3 considers this).

Once more is known about how site options perform and how they fit with area strategy then it will be possible to distinguish, if needed, between the better and less well performing sites amongst those considered the 'more sustainable sites' resulting from the Stage 3 . (Step 4 summarises Steps 1-3)

But the starting point is that all sites will go forward where there is evidence that they have net benefits, fit broadly with area strategy and are consistent with Core Policy 1. A judgement, however, may need to be made on rejecting one or more sites when:

- the overall scale of development exceeds that proposed by each area strategy.
- if several site options at a large village suggest a scale of development that exceeds 'modest growth' that is not supported by local needs.

If the more sustainable sites do not look like they will provide enough housing, it might be necessary to look again at 'less sustainable sites' identified at Stage 3.



Each remaining site option should have a detailed site boundary and short description of site-specific measures, not common with any other site<sup>19</sup>, that are necessary either to mitigate harm or maximise benefits. This text would be capable of transfer to a draft Plan. (This is Step 5).

Stage 4a is carried out in five steps. Steps 1-4 are carried out for each of the 'more sustainable sites' recommended by the Stage 3 SA results. Only in exceptional circumstances should it be necessary for further assessment of 'less sustainable sites' (see above). Step 5 considers the area of search as a whole, selects and justifies the selection of preferred sites and concludes with a set of draft proposals.

**Step 1** (1) transforms a SHLAA site into a possible draft proposal by a more detailed assessment of the effects identified in Stage 3; and (2) provides a measure of the net sustainability benefits of each site.

**Step 2** assesses how well a site may contribute to the relevant area strategy for the wider community area in terms of how much it might contribute to housing requirements, deliver the vision for the area or address specific local issues.

**Step 3** is a specific assessment of whether a site at a large village is consistent with Core Policy 1; that it would constitute modest growth and meet local needs, including local housing needs

**Step 4** is a summary conclusion for each site.

**Step 5** considers all the sites together and is the selection and rejection of sites. All sites that have satisfied Steps 1-3 would be taken forward. The step compares the total dwellings that are provided by the pool of sites to indicative residual requirements. Where necessary, it selects and justifies site options that need to be rejected because the overall scales of development exceed that proposed by each area strategy.

- if several site options at a large village suggest too much development then a site may need to be rejected.

The conclusion gives an individual justification for a site being rejected. Generally, it should be the site option(s) that performs the least well using evidence from Step 4.

Steps 1-5 are recorded in each community area paper using the following templates and cue or decision aiding questions.

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<sup>19</sup> Each Community Area Topic Paper, Stage 4a Introduction lists generic mitigation measures that can generally be assumed to be common to all sites.

STEP 1 – POTENTIAL SITE SUITABILITY

Criteria	DAQ
Can site-specific adverse effects be mitigated? If so how?	<ol style="list-style-type: none"> <li>1. Identify each site-specific adverse effect in the SA</li> <li>2. Describe the measures and how these mitigate the effects</li> <li>3. Are there measures essential to allow development to proceed If so describe how these measures are referred to in the Plan text (1-2 sentences)</li> <li>4. Do they affect the capacity of the site?</li> <li>5. Do they change the boundary to the site</li> </ol> <p>Consult as appropriate with the relevant consultee associated with each SA objective</p>
How well site-specific positive effect be realised?	<p>The converse to the above. Opportunities should be explored, with relevant consultees if necessary, to maximise benefits whilst ensuring that they are necessary, directly-related and proportionate to the proposal.</p> <p>.</p>
How accessible is the site?	<p>A summary description of how vehicle access can be achieved, how easily and if development would create congestion or safety problems?</p> <p>A description of how well the site is located in relation to local services and employment in terms of access by alternatives to the private car.</p>
Overall suitability	<p>An overall conclusion as to whether mitigation measures are reasonable and achievable.</p> <p>Site capacity is stated taking account of mitigation measures and this is used as the basis of assessment for steps 2-5.</p> <p>No potential sites are rejected at this stage. Most sites will however 'go forward' to selection, given the SA conclusion. However, it would need to be noted that a 'moderate adverse effect' that cannot be fully mitigated will need substantial benefits to outweigh it in order for such a site to be allocated.</p> <p>Where there is more than one site at a settlement, it is important that this section highlights each one's particular strengths and weaknesses.</p>

STEP 2 – POTENTIAL SITE FIT WITH AREA STRATEGY

Answers are not expected to be in depth. It is important to note where site options conflict or undermine aspects of the strategy or may have a specific consequence particular to that site. These are the two main aspects that will influence whether or not a site is selected.

Criteria	DAQ
Scale of development v requirement	What % of the residual indicative dwelling requirement <sup>20</sup> does the site deliver.
Fit with area vision	How well does the site promote the vision for the area (WCS: ‘How will the ?? Community Area change by 2026?’)?
Addresses specific issues	How would development of the site address issues identified in the Area Strategy?  (WCS requires development proposals to demonstrate how these issues and considerations will be addressed.)



STEP 3: LARGE VILLAGE POTENTIAL SITE FIT WITH CORE POLICY 1

For context also refer to the stage 2 work that has already been undertaken on large villages suitability. Appendix 6 has the methodology used at stage 2 and there are completed templates for each community area remainder. (These are also summarised in topic papers). Answers are needed for all DAQ questions.

Criteria	DAQ
Needs can be met at the local primary school	Is there capacity in the local primary school(s)?
Modest scale of development	Proportionate increase in the total size of a settlement and Continuity with past rates of development
Meeting Local Housing Needs	Is there evidence to show that a Neighbourhood Plan (NP) will address local housing needs or that there will not be an NP?  Could Local Housing Needs be met by an exception scheme under policy CP44

STEP 4: SITE SUMMARY

Conclusion and summary of steps 1-3

Overall conclusion to the above narrative: indicating the form, extent and certainty of net benefits, stating whether or not the site conforms to Core Policy 1 (for a rural settlement) and how central a proposal may (or may not be), individually or in combination, to achieving the area vision set in the core strategy and in addressing any identified key issues (particularly for towns and principal settlements)

Summary should include an overall statement of sustainability net benefit, using the following as a guide

Overall sustainability	Criteria	Justification
Marginal	<b>A significant negative adverse effect results from more detailed assessment</b> because ...	<p>...It is not certain that a site is developable (possibly insurmountable infrastructure obstacle (e.g. not physically possible to enlarge local primary school), no realistic safe vehicle access, significant new constraint)</p> <p>... It is not certain that positive effects will outweigh negative ones (e.g. site will be subject to HRA appropriate assessment)</p>
Minor	<b>There are several minor adverse effects all straight forward to mitigate but benefits are limited</b> because ...	<p>... the scope for affordable housing is limited</p> <p>... constraints severely limit the proportion of development acceptable on the site</p> <p>... development adds to pressures on local infrastructure except for CIL contributions</p>
Moderate	<b>Adverse effects are minor and will be resolved by straightforward mitigation</b> and ...	<p>...there is scope for affordable housing</p> <p>... if necessary, development can help to address local infrastructure capacity issues over and above CIL</p>

Good	<b>Minor adverse effects are clearly outweighed by positive benefits</b> and ...	<p>...there is good scope for affordable housing and there is evidence of need</p> <p>... development will provide local infrastructure on site, helping to address local infrastructure capacity issues over and above CIL</p> <p>...scale of development is not limited or dependent upon resolving important constraints</p>
Significant	<b>Development addresses positively a specific issue identified in the area strategy</b> and ...	<p>...minor adverse effects are clearly outweighed by positive benefits</p> <p>... there is good scope for affordable housing and there is evidence of need</p> <p>... development will provide local infrastructure on site, helping to address local infrastructure capacity issues over and above CIL</p> <p>... scale of development is not limited or dependent upon resolving important constraints</p>



Step 5 : Community Area/settlements CONCLUSIONS

DAQ

Fit with spatial strategy	<p>Record total dwellings that are provided by the pool of preferred sites v indicative requirements. Do these results fit with the spatial strategy indicative requirements?</p> <p>Is it necessary to reduce the number of sites? Is it necessary to include 'less sustainable sites'? If so which ones and why, repeating steps 1-4 above for these sites?</p>
Selection of preferred sites	<p>Should any potential sites be rejected because adverse effects outweigh the benefits?</p> <p>Should any potential sites be removed at a large village in order to comply with CP1 because</p> <ul style="list-style-type: none"> <li>• they exceed 'modest growth' for which there is no local justification</li> <li>• Where there is more than one potential site at a village, should one or more sites be removed to fit with Core Policy 1. If so which one(s) and why those?</li> </ul> <p>Should any potential sites at Market Towns or Principal Settlements be retained in order to provide sufficient housing even though because adverse effects outweigh the benefits?</p> <p>Justify the selection of sites based on preferring those remaining sites that produce the most net benefits.</p> <p>Preferred sites should fit well with the spatial strategy. Sites at Market Towns and Principal Settlements will fit with these being the focus for growth. Large villages should only accept modest growth to meet local needs (as assessed for each site at step 3 and as above).</p> <p>Summarise the local justification for greater scales of development than modest growth at a Large Village.</p> <p>The role of a site at a Local Service Centre will also need to be recognised.</p>

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# **APPENDIX 4**

## **Wiltshire Housing Site Allocations Plan**

### **Topic Paper 3: Housing Land Supply**

June 2017



## 1 INTRODUCTION

- 1.1 Wiltshire Council is preparing the **Wiltshire Housing Site Allocations Plan** (hereafter referred to as 'the Plan'), which will support the delivery of the adopted Wiltshire Core Strategy by helping to maintain a sufficient supply of housing through the period up to 2026.
- 1.2 This Topic Paper has been prepared to support the development of the Plan by setting out the basis upon which the Core Strategy's overall housing numbers are to be planned for. It has been updated from an earlier paper published for the informal consultation in February 2015<sup>1</sup> and subsequent Housing Land Supply Statements<sup>2</sup> to reflect evidence gathered during the plan making process.
- 1.3 At the time the Plan is released for consultation the Council is undertaking its annual surveying exercise for the 2016/2017 monitoring year. In order to present a position that represents the anticipated housing land supply at the point of examination as closely as possible and to conform to national policy on evidence<sup>3</sup>, the Council has estimated the 2017 base date housing land supply position in order to inform the Plan. This will be used as the baseline to demonstrate the extent that the proposed allocations will meet the housing requirements for Wiltshire to 2026, and the estimated effect on the five year housing land supply for each of Wiltshire's Housing Market Areas.
- 1.4 As outlined through the initial informal consultation exercises undertaken in 2014 and 2015, the context and scope of the Plan has essentially been determined by recommendations emanating from the Core Strategy Inspector's Report. As such, the fundamental questions of '*how much housing should be planned for over the period to 2026*' and '*where this growth should be delivered*' have been largely directed by Core Policies 1 and 2, as well as the Community Area Strategies (Chapter 5) of the Core Strategy. Therefore the challenge for the Plan has been to provide clear direction and certainty through a plan-led approach towards delivering housing supply across the Plan period to 2026.

## 2 PURPOSE

### A planned approach to housing supply

- 2.1 There are three objectives to the Plan:
- Review all settlement boundaries in the Wiltshire Core Strategy (WCS) (except for Chippenham, which has been addressed through the Chippenham Site Allocations Plan)

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<sup>1</sup> Wiltshire Housing Site Allocations DPD – Housing Supply Paper (February 2015) which was based on data published in the 2014 Housing Land Supply Statement (July 2014)

<sup>2</sup> The Housing Land Supply Statements published in September 2015, November 2016, and March 2017.

<sup>3</sup> National Planning Policy Framework paragraph 158

- where necessary, identify new allocations for housing at settlements to provide for additional housing to help deliver the WCS housing requirement.
- demonstrate that a continuous five year supply of deliverable land for housing can be met for the duration of the Plan.

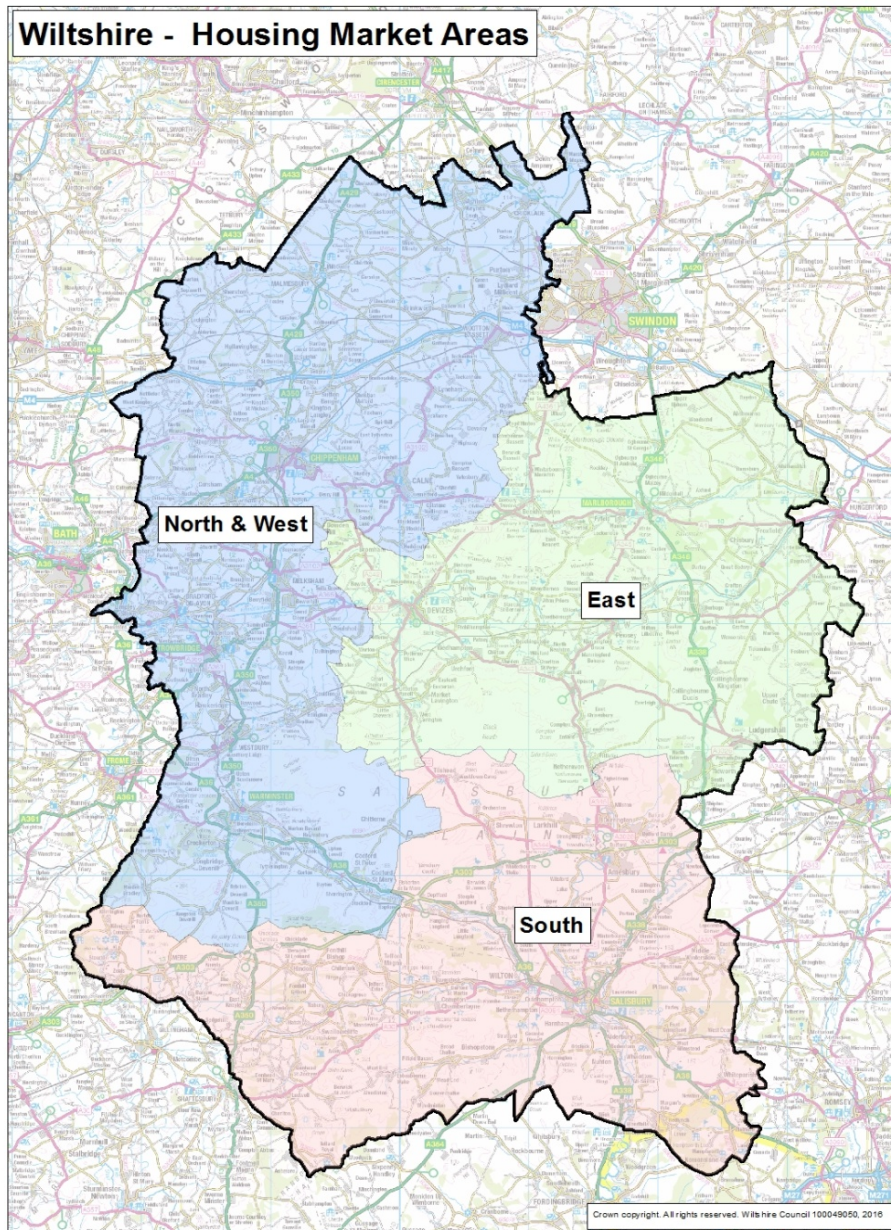
2.2 The purpose of this Topic Paper is to set out how the housing land supply position has evolved over the preparation of the Plan. It shows how housing delivery and provision of land supply has progressed over time in each of the Housing Market Areas (HMA) and Community Areas set out in the WCS. It then explains how the latest estimated housing land supply position has been formulated which provides the evidence base to justify the Plan. This forms the starting point for the methodology set out in Topic Paper 2 including identifying areas where additional land is needed to meet the WCS housing requirements. The output from the methodology feeds into the development of the Plan proposals which is explained in Topic Paper 4.

### **Housing Market Area requirements**

2.3 Paragraph 49 of the National Planning Policy Framework states that where local planning authorities cannot demonstrate a 5-year land supply for housing, then policies relating to the supply of housing should not be considered up-to-date. Further, in paragraph 14, where relevant policies are out of date the presumption in favour of sustainable development should be applied.

2.4 One of the objectives of the Plan is to ensure that each HMA has a sufficient stock of developable sites to help deliver the housing requirements of the Wiltshire Core Strategy, and boost to housing land supply, in line with national policy. Recognising the importance of this, the Plan has been prepared against the existing context of Wiltshire's three HMAs shown in Figure 1 below. As such, the Plan will set out allocations of land within each HMA, and in line with Core Policy 1 ('Settlement Strategy') and Core Policy 2 ('Delivery Strategy') of the Core Strategy.

**Figure 1: Map of Wiltshire Housing Market Areas**



### 3 HOUSING LAND SUPPLY

3.1 In line with national policy<sup>4</sup> and guidance<sup>5</sup>, the Council produce an annual assessment of deliverable sites that contribute to the housing land supply. This is used to establish to identify an immediate 5-year supply of deliverable sites, and to identify specific sites or broad locations for development for the duration of the Plan period in years 6-15.

<sup>4</sup> National Planning Policy Framework paragraph 47.

<sup>5</sup> Planning Practice Guidance - "Housing and economic land availability assessment" paragraphs 3-030 and 3-033



- 3.2 There are two aspects to the assessment. Firstly a comprehensive site-by-site survey of housing planning permissions is carried out, to establish the number of units completed in the annual monitoring period (1 April to 31 March each year).
- 3.3 Secondly, to establish the developable supply the Council also undertake a survey of developers and representatives of large<sup>6</sup> sites, and sites allocated in Neighbourhood Plans to establish timescales for development, and the anticipated annual yield from sites. These are checked with planning officers to confirm delivery expectations. The results of the two survey processes are published in a Housing Land Supply Statement.
- 3.4 The Housing Land Supply Statement includes at Appendix 6 a summary of completions, developable commitments, and the residual indicative requirement against each main settlement and Community Area. Over the passage of time, houses with planning permission are constructed, and the housing land supply is continually replenished through the grant of planning permissions and allocations of sites in Local and Neighbourhood Plans. On occasion, events such as a delay in delivery at very large sites or removal of allocations from development plans, can result in the residual requirement increasing. However the predominant trend is for the residual indicative requirement decreasing year-on-year.
- 3.5 The impact of this can be shown in Table 1 below which shows how the residual indicative requirement has changed during the formulation of the Plan. This information has informed the final Areas of Search. Cells that are greyed out show at years where the indicative residual requirement was met.

**Table 1: Residual indicative requirements 2014-2017 by Area<sup>7</sup>**

Area	Overall indicative requirement 2006-2026	Residual indicative requirement 2014	Residual indicative requirement 2015	Residual indicative requirement 2016	Residual indicative requirement 2017
Devizes	2,010	333	0	0	0
Devizes CA remainder	490	210	193	154	102
Devizes CA	2,500	543	193	154	102
Marlborough	680	83	35	57	17
Marlborough CA remainder	240	91	81	34	34
Marlborough CA	920	174	116	91	51
Pewsey CA	600	137	54	0	0
Tidworth and Ludgershall	1,750	82	121	88	74

<sup>6</sup> Sites of 10 or more housing units.

<sup>7</sup> Source: Housing Land Supply Statements 2014 – 2016. The residual indicative requirement for 2017 has been estimated.

Area	Overall indicative requirement 2006-2026	Residual indicative requirement 2014	Residual indicative requirement 2015	Residual indicative requirement 2016	Residual indicative requirement 2017
Tidworth CA remainder	170	84	84	75	74
Tidworth CA	1,920	165	205	163	149
<b>EAST WILTSHIRE HMA<sup>8</sup></b>	<b>5,940</b>	<b>1,019</b>	<b>530</b>	<b>337</b>	<b>170</b>
Bradford on Avon	595	17	64	0	0
Bradford on Avon CA remainder <sup>9</sup>	185	76	57	61	0
Bradford on Avon CA <sup>9</sup>	780	93	121	61	0
Calne	1,440	44	0	0	0
Calne CA remainder	165	75	0	0	0
Calne CA	1,605	119	0	0	0
Chippenham	4,510	286	0	1,661	0
Chippenham CA remainder	580	149	183	159	138
Chippenham CA	5,090	435	183	1,819	138
Corsham	1,220	330	226	0	0
Corsham CA remainder	175	0	0	0	0
Corsham CA	1,395	330	226	0	0
Malmesbury	885	0	0	0	0
Malmesbury CA remainder	510	151	116	86	70
Malmesbury CA	1,395	151	116	86	70
Melksham and Bowerhill	2,240	611	616	134	0
Melksham CA remainder	130	51	49	24	0
Melksham CA	2,370	661	664	159	0
Royal Wootton Bassett	1,070	0	0	0	0
Royal Wootton Bassett and Cricklade CA remainder <sup>10</sup>	385	113	63	0	0

<sup>8</sup> The totals for each HMA and for Wiltshire account for any delivery in excess of the indicative requirement in the Community Areas. As such, in years where an Area has met or exceeded its indicative requirement, the HMA and Wiltshire figures will not sum from the respective Community Area figures shown.

<sup>9</sup> Totals for Bradford on Avon CA remainder and Bradford on Avon CA exclude any development at Staverton Marina which is classified as Trowbridge Principal Settlement.

<sup>10</sup> Totals for Royal Wootton Bassett & Cricklade CA remainder and Royal Wootton Bassett & Cricklade CA exclude any development at the West of Swindon.

Area	Overall indicative requirement 2006-2026	Residual indicative requirement 2014	Residual indicative requirement 2015	Residual indicative requirement 2016	Residual indicative requirement 2017
Royal Wootton Bassett and Cricklade CA <sup>10</sup>	1,455	113	63	0	0
Trowbridge	6,810	1,399	1,635	2,017	2,020
Trowbridge CA remainder	165	0	0	0	0
Trowbridge CA	6,975	1,399	1,635	2,017	2,020
Warminster	1,920	317	318	462	462
Warminster CA remainder	140	49	42	31	32
Warminster CA	2,060	365	360	494	494
Westbury	1,500	74	30	38	0
Westbury CA remainder	115	55	48	47	47
Westbury CA	1,615	129	78	84	47
<b>NORTH &amp; WEST WILTSHIRE HMA<sup>8</sup></b>	<b>24,740</b>	<b>3,603</b>	<b>2,489</b>	<b>1,967</b>	<b>571</b>
Amesbury, Bulford and Durrington	2,440	69	155	72	73
Amesbury CA remainder	345	184	138	128	108
Amesbury CA	2,785	253	293	199	181
Mere	235	106	0	0	0
Mere CA remainder	50	12	8	8	8
Mere CA	285	119	8	8	8
Salisbury & Wilton	6,060	0	0	160	173
Wilton CA remainder	255	102	105	130	129
Salisbury and Wilton CAs	6,315	102	105	289	302
Downton	190	122	115	0	0
Southern Wiltshire CA remainder <sup>11</sup>	425	56	4	0	0
Southern Wiltshire CA <sup>11</sup>	615	177	118	0	0
Tisbury	200	39	26	24	25
Tisbury CA remainder	220	158	154	150	149

<sup>11</sup> Totals for Southern Wiltshire CA remainder and Southern Wiltshire CA exclude any development at Old Sarum or extensions to Salisbury City, as these are classified as Salisbury.



Area	Overall indicative requirement 2006-2026	Residual indicative requirement 2014	Residual indicative requirement 2015	Residual indicative requirement 2016	Residual indicative requirement 2017
Tisbury CA	420	197	180	174	174
<b>SOUTH WILTSHIRE HMA<sup>8</sup></b>	<b>10,420</b>	<b>722</b>	<b>575</b>	<b>616</b>	<b>594</b>
<b>SWINDON (WITHIN WILTSHIRE)</b>	<b>900</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>WILTSHIRE<sup>8</sup></b>	<b>42,000</b>	<b>5,346</b>	<b>3,544</b>	<b>2,870</b>	<b>1,285</b>

- 3.6 As Table 1 shows, over the passage of time residual requirements are, in most cases, reduced and in many cases have met the indicative requirement already. However there are examples where the residual indicative requirement has reduced more slowly or increased.
- 3.7 At the East HMA delivery and provision of supply has shown a steady decrease in the residual indicative requirement. The making of a number of Neighbourhood Plans in this HMA has assisted in increasing supply.
- 3.8 At the North & West HMA the overall trend is also of a steady decrease in residual requirement. The suspension of the Chippenham Site Allocations Plan and removal of the proposed allocations from the deliverable supply accounted for a slowdown in the reduction in 2016. The significant number of large site permissions granted in the 2017 monitoring year bolstered supply, however there remains a indicative residual requirement to be met by the end of the plan period.
- 3.9 The South HMA initially shows a steady decline. However since 2015 the residual remainder has increased slightly considerably due to delays in delivery at strategic sites.

### Estimated 2017 baseline position

- 3.10 The latest confirmed housing land supply position is presented in the update to the 2016 Housing Land Supply Statement (March 2017)<sup>12</sup>.
- 3.11 At the time the Plan has been released for consultation, the Council is undertaking its annual surveying exercise for the 2016/2017 monitoring year. Therefore in order to present a position that represents the most up-to-date housing land supply

<sup>12</sup> The original 2016 Housing Land Supply Statement was published in November 2016. Subsequent to this, the Chippenham Site Allocations Plan Inspector released his Final Report in February 2017 which considered the two mixed-use allocations in the Plan to pass the tests of soundness. As a result the Council updated its housing land supply position and issued an update to the 2016 Housing Land Supply Statement in March 2017.

as closely as possible, the Council has estimated the 2017 base date housing land supply position in order to inform the Plan. This is based on data known at the time of publication, namely the update to the 2016 Housing Land Supply Statement (hereafter “2016 HLSS update”).

**Note: the estimated 2017 position is solely for illustrative purposes to inform the development of the Plan. It is not a fully confirmed position and, as such, should not be used for decision-making in determining planning applications and appeals.**

- 3.12 The method and assumptions used in estimating the 2017 base date position are set out below.

### 2016/2017 Completions

- 3.13 The delivery in Year 1 (2016/2017) of the housing land supply trajectory from the 2016 HLSS update represents the expected completions from permissions granted up to 31 March 2016. The only exception is site reference NP/E3 (Stonebridge House, Nursteed Road) which was allocated in the Devizes Neighbourhood Plan. This was anticipated to deliver units in 2016/2017 but does not yet have planning permission. This has been moved back 1 year to deliver in 2017/2018. The completions by HMA are shown in Table 2 below.
- 3.14 A number of small housing sites have been granted permission from 1 April 2016 – 31 March 2017. Historic delivery data shows a small proportion of these new permissions will deliver housing within the monitoring year in which they are permitted. However the Council has not included this source in the estimated completions figures as delivery from these permissions has not been quantified at time of publication. As such the stated completions are likely to under-estimate the actual completions totals for the monitoring year. Completions represent housing previously in the land supply so a higher estimate of completions could result in the overall land supply being reduced. However the Council are continuously replenishing the land supply with new permissions and resolutions, so any under-estimation will not have an effect on the Plan.

**Table 2: Estimated 2016/2017 completions**

Housing Market Area (HMA)	Completions from permissions granted up to 31 March 2016
East Wiltshire HMA	344
North & West Wiltshire HMA	847
South Wiltshire HMA	473
West of Swindon	74
<b>Wiltshire</b>	<b>1738</b>

### 2017 Housing land supply

- 3.15 This is made up of four components as set out below in paragraphs 3.16 – 3.19.
- 3.16 Delivery shown in Year 2 (2017/2018) to Year 10 (2025/2026) of the housing land supply trajectory in the 2016 HLSS update represents future delivery from **existing sites**. As the monitoring period has now moved forward by one year, this now represents Years 1 – 9 of the estimated 2017 trajectory. Any anticipated delivery in Year 11 (beyond the end of the plan period in 2026/2027) now represents Year 10 of the estimated trajectory. The only exception to this is the Stonebridge House allocation referenced above.
- 3.17 During the monitoring year 2016/2017 a number of large sites have come forward and received permission or a committee resolution to permit (subject to completion of a Section 106 agreement). These **new sites** have been detailed in Table 3 of the 2016 HLSS update. As these sites have been identified prior to 1 April 2017 they now qualify for, and thus have been added to, the deliverable supply. The proposed trajectories for these sites have been based on historic delivery trends.
- 3.18 As stated above, a number of small housing sites have been granted permission from 1 April 2016 – 31 March 2017. However the Council has not included these **new sites** in the estimated supply figures as these have not been quantified at time of publication. As such the trajectory and housing land supply position is likely to under-estimate the actual position for the monitoring year. However this will not impact the Plan as, when quantified, these permissions will further bolster the land supply position.
- 3.19 During the monitoring year, a number of Neighbourhood Plans have been ‘made’ in Wiltshire. Sites allocated for housing in those Plans, namely at Potterne and Urchfont (both East Wiltshire HMA), and Holt and Compton Bassett (both North & West Wiltshire HMA) have also been added to the deliverable supply. The proposed trajectory has been based on historic delivery trends.
- 3.20 In line with paragraph 48 of the National Planning Policy Framework the Council include a windfall allowance in its housing land supply. The Council's approach is set out in Appendix 5 of the 2016 HLSS update. The trajectory of the anticipated windfall delivery has been reset to recommence in Year 1 (2017/2018).

### Monitoring

- 3.21 The Council anticipate it will have completed its survey exercise for the 2016/2017 monitoring year and published the results in its Housing Land Supply Statement later in 2017, but prior to submission of the Plan, which is programmed for 2018. The ‘confirmed’ 2017 position will be considered at the time of submission.
- 3.22 The Council's estimated 5-year housing land supply position (using an April 2017 base date) is illustrated in Table 3.



**Table 3: Estimated 2017 Housing Land Supply for the Wiltshire HMAs (base date April 2017).**

Area	Housing requirement 2006-2026	Housing completions 2006-2017	Five year housing requirement 2017-2022	Deliverable supply 2017-2022	Number of years of deliverable supply <sup>13</sup>
East Wiltshire HMA	5,940	3,497	1,357	2,300	8.47
North & West Wiltshire HMA	24,740	12,603	6,743	8,922	6.62
South Wiltshire HMA	10,420	5,067	2,974	3,356	5.64
Wiltshire HMAs	41,100	21,167	N/A	14,578	N/A
Swindon (within Wiltshire)	900	540	N/A	350	N/A
<b>Wiltshire Total</b>	<b>42,000</b>	<b>21,707</b>	<b>N/A</b>	<b>14,928</b>	<b>N/A</b>

3.23 As shown in Table 3 there is currently a demonstrable 5-year housing land supply in all three HMAs. However even within a context of delivery on allocated sites in the Core Strategy, allocations in the Chippenham Housing Site Allocations Plan, and the prospect of further 'windfall' development, there will continue to be a requirement to plan for additional growth to maintain supply.

3.24 One of the objectives of the Plan is to ensure a 5-year housing land supply can be maintained throughout the remaining Plan period. The anticipated position for each year of the Plan (using the estimated 2017 position as a baseline) is shown in Table 4.

**Table 4: 5-year housing land supply position by HMA (2017-2026)**

HMA	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
East	8.47	8.18	8.32	10.11	13.64	10.79	8.21	6.29	4.94
North & West	6.62	6.80	6.81	6.55	6.48	6.11	5.42	4.60	3.82
South	5.64	5.57	5.42	5.35	5.28	5.13	4.59	3.83	2.97

3.25 In the East HMA the baseline information also shows a reasonable surety of supply without any further land being allocated, with most years supply exceeding 8 years' worth. Taking into account the settlement strategy, which directs development to the most sustainable locations, the focus should be at the higher order settlements. The existing surety of supply until the end of the plan period suggests that allocations for housing at Large Villages in this HMA would be unjustified. The strategic priority to deliver the homes needed, is secondary to giving communities direct power to

<sup>13</sup> In accordance with the National Planning Policy Framework, the Council applies a buffer to its 5-year supply. This equates to needing to show a 5.25 years supply of land to meet 5 years worth of requirement.

develop a shared vision for their neighbourhood and delivering the sustainable development they need. The most appropriate means to assess local needs and plan growth at each Large Village in the East HMA is through the neighbourhood planning process. The Plan, therefore, does not need to seek to allocate land for housing development at Large Villages in the East HMA.

- 3.26 In the North & West HMA and South HMA there is a significant reliance on large strategic housing sites to meet strategic requirements. These are now beginning to play a much more substantial role in housing growth. The housing land supply position is considerably lower than in the East HMA, and in the South HMA there are a number of occurrences where the 5.25 years' worth of supply is marginal. This would indicate a greater degree of intervention to meet the objectives of the Plan.
- 3.27 How possible Plan allocations for housing development help to achieve Plan objectives in each HMA is assessed in Topic Paper 4: Developing Plan Proposals.
- 3.28 In order to maintain supply across Wiltshire's HMAs and Community Areas, there is a need to understand development patterns and delivery 'performance' - i.e. how areas have responded to growth in the past; and whether there is a need to bolster supply in areas where there is an identified residual need. The status of settlements in the settlement strategy and the indicative housing requirements set out within the Community Area Strategies has been taken into account in the preparation of the Plan in order to ensure that a sustainable distribution of growth across Wiltshire is maintained through the period to 2026.

**4. SETTLEMENT HIERARCHY AND COMMUNITY AREA INDICATIVE REQUIREMENTS**

- 4.1 Core Policy 1 of the Wiltshire Core Strategy identifies and establishes a classification of settlements where sustainable development will take place over the plan period. Further amplification of the settlement hierarchy is then presented in Chapter 5 through the 'Area Strategies'.
- 4.2 The settlement strategy directs development to the most sustainable locations. As such, the bulk of planned growth is destined to take place at the higher order settlements (i.e. Principal Settlements and Market Towns, as well as the Local Service Centres) as outlined below.

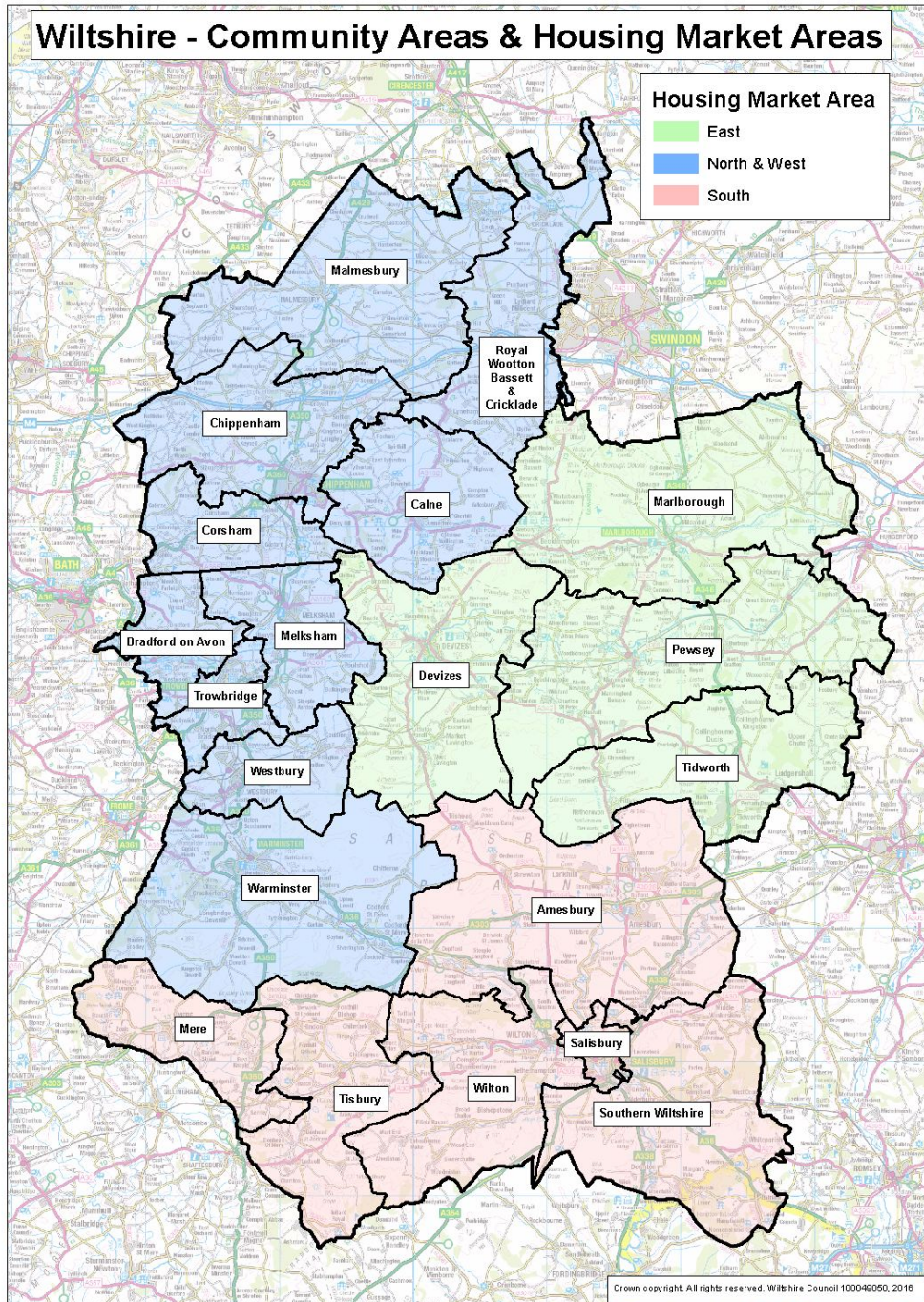
<b>Principal Settlements</b>	Chippenham, Trowbridge and Salisbury
<b>Market Towns</b>	Amesbury (incorporating Bulford and Durrington), Bradford on Avon, Calne, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Tidworth and Ludgershall, Warminster, Westbury and Royal Wootton Bassett
<b>Local Service Centres</b>	Pewsey, Market Lavington, Cricklade, Tisbury, Mere,

	Downton and Wilton
<b>Large and Small Villages</b>	As set out in Chapter 5 of the adopted Wiltshire Core Strategy

4.3 The Plan will follow the principles of the settlement strategy. The Council sub-divides the County into twenty 'Community Areas' and this is reflected in the policy commitments of the Core Strategy. As such, each Community Area has its own allocation of the overall housing requirements in the form of an indicative requirement for that area. The detailed breakdown by Community Area of the current housing land supply position is set out in Table 5 below. The Community Areas and their relationship with the Housing Market Areas are shown in Figure 2 below.



**Figure 2: Map of Wiltshire Community Areas and Housing Market Areas**



4.4 It is important to stress that the housing requirements set out in the Area Strategies of the Core Strategy are expressed as *'indicative'*, as this provides flexibility within each HMA. In this sense, the housing figures for each Community Area are not intended to be a prescriptive minima or maxima, instead they are an indication of the general scale of growth appropriate for each area and key settlements during the plan period.

4.5 In his final report, the WCS Examining Inspector considered (at paragraph 44) that

*“I am also satisfied that the identification of indicative levels of housing for Community Areas is not unduly rigid or prescriptive; such an approach will enable suitable flexibility to be applied by the Council in managing the effective delivery of necessary housing within the HMAs.”*

- 4.6 Therefore, this is an important principle of the Plan as it will afford the opportunity to examine supply constraints (e.g. environmental considerations) in a particular Community Area without being obliged to meet a definite requirement in that area.
- 4.7 Although the Plan will be identifying specific sites to meet indicative housing requirements, a balance will nonetheless need to be reached to ensure that settlements grow in line with the principles of the delivery strategy set out in the Core Strategy. Therefore, although there may well be significant development interests in any location, not all sites will be required to come forward in this Plan period.
- 4.8 However, in certain locations it may not be possible to identify sufficient sites to meet indicative requirements. Such circumstances may apply in locations where constraints, such as the Green Belt, prevent a full allocation of sites to be identified. The Community Area Topic Papers for each area will highlight where this scenario applies and what effect this may have on the Area Strategy. Topic Paper 4: Developing Plan Proposals, will consider what effect this could have on delivering the overall HMA requirements, maintaining land supply across the Plan period and whether further sites need to be identified.

### **Community Areas - Indicative Housing Requirements**

- 4.9 Table 5 below shows the indicative requirement set out in the Wiltshire Core Strategy<sup>14</sup> and progress on delivery and committed supply as at April 2017. The final two columns represent the residual remaining requirement shown in two different ways:

**Indicative remaining requirement (quoted):** where the indicative requirement has been met or exceeded the remaining requirement is shown as zero.

**Indicative remaining requirement (“actual delivery”):** where the indicative requirement has been exceeded, the residual remainder is shown as a negative value to demonstrate the extent by which this has been achieved.

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<sup>14</sup> Wiltshire Core Strategy (January 2015) – paragraph 4.26 (incorporating Table 1) and Chapter 5: Area Strategies

**Table 5: Estimated 2017 summary assessment of supply and residual requirement.**

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	Indicative remaining requirement ('quoted')	Indicative remaining requirement ('actual delivery')
Devizes	2,010	1,447	689	0	-126
Devizes CA remainder	490	286	102	102	102
Devizes CA	2,500	1,733	792	102	-25
Marlborough	680	357	306	17	17
Marlborough CA remainder	240	160	46	34	34
Marlborough CA	920	517	352	51	51
Pewsey CA	600	426	179	0	-5
Tidworth and Ludgershall	1,750	728	948	74	74
Tidworth CA remainder	170	93	3	74	74
Tidworth CA	1,920	821	950	149	149
<b>EAST WILTSHIRE HMA</b>	<b>5,940</b>	<b>3,497</b>	<b>2,273</b>	<b>301</b>	<b>170</b>
Bradford on Avon	595	387	212	0	-4
Bradford on Avon CA remainder <sup>15</sup>	185	119	72	0	-6
Bradford on Avon CA <sup>4</sup>	780	506	284	0	-10
Calne	1,440	961	807	0	-328
Calne CA remainder	165	92	153	0	-80
Calne CA	1,605	1,053	961	0	-409
Chippenham	4,510	1,204	3,819	0	-513
Chippenham CA remainder	580	409	33	138	138
Chippenham CA	5,090	1,613	3,852	138	-375
Corsham	1,220	646	587	0	-13
Corsham CA remainder	175	255	96	0	-176
Corsham CA	1,395	901	684	0	-190
Malmesbury	885	560	455	0	-130
Malmesbury CA remainder	510	336	104	70	70
Malmesbury CA	1,395	896	559	70	-60
Melksham and Bowerhill	2,240	1,370	1,221	0	-351

<sup>15</sup> Totals for Bradford on Avon CA remainder and Bradford on Avon CA exclude any development at Staverton Marina which is classified as Trowbridge Principal Settlement.



Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	Indicative remaining requirement ('quoted')	Indicative remaining requirement ('actual delivery')
Melksham CA remainder	130	101	38	0	-9
Melksham CA	2,370	1,471	1,259	0	-360
Royal Wootton Bassett	1,070	997	158	0	-85
Royal Wootton Bassett and Cricklade CA remainder <sup>16</sup>	385	315	150	0	-80
Royal Wootton Bassett and Cricklade CA <sup>5</sup>	1,455	1,312	309	0	-166
Trowbridge	6,810	2,965	1,825	2,020	2,020
Trowbridge CA remainder	165	255	23	0	-113
Trowbridge CA	6,975	3,220	1,848	2,020	1,907
Warminster	1,920	603	855	462	462
Warminster CA remainder	140	90	18	32	32
Warminster CA	2,060	693	873	494	494
Westbury	1,500	877	931	0	-308
Westbury CA remainder	115	61	7	47	47
Westbury CA	1,615	938	938	47	-261
<b>NORTH &amp; WEST WILTSHIRE HMA</b>	<b>24,740</b>	<b>12,603</b>	<b>11,566</b>	<b>2,769</b>	<b>571</b>
Amesbury, Bulford and Durrington	2,440	1,311	1,056	73	73
Amesbury CA remainder	345	179	58	108	108
Amesbury CA	2,785	1,490	1,114	181	181
Mere	235	126	139	0	-30
Mere CA remainder	50	37	5	8	8
Mere CA	285	163	144	8	-22
Salisbury	6,060	2,273	3,083	173	173
Wilton		323	208		
Wilton CA remainder	255	115	11	129	129

<sup>16</sup> Totals for Royal Wootton Bassett & Cricklade CA remainder and Royal Wootton Bassett & Cricklade CA exclude any development at the West of Swindon.

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	Indicative remaining requirement ('quoted')	Indicative remaining requirement ('actual delivery')
Salisbury and Wilton CAs	6,315	2,711	3,302	302	302
Downton	190	88	105	0	-3
Southern Wiltshire CA remainder <sup>17</sup>	425	385	78	0	-38
Southern Wiltshire CA <sup>6</sup>	615	473	183	0	-41
Tisbury	200	170	5	25	25
Tisbury CA remainder	220	60	11	149	149
Tisbury CA	420	230	16	174	174
<b>SOUTH WILTSHIRE HMA</b>	<b>10,420</b>	<b>5,067</b>	<b>4,759</b>	<b>665</b>	<b>594</b>
<b>SWINDON (WITHIN WILTSHIRE)</b>	<b>900</b>	<b>540</b>	<b>410</b>	<b>0</b>	<b>-50</b>
<b>WILTSHIRE</b>	<b>42,000</b>	<b>21,707</b>	<b>19,008</b>	<b>3,735</b>	<b>1,285</b>

4.10 Both the 'quoted' and 'actual delivery' figures demonstrate that certain Areas already have an abundance of commitments to meet the indicative requirement. The 'quoted' figures reflect how developable supply is portrayed in the Council's monitoring practices and in the Housing Land Supply Statement. It effectively treats each Area in isolation, and any delivery above the indicative requirements is simply an effect of the indicative nature of the requirement. This in turn is aggregated up to reflect that the housing requirement for each HMA and Wiltshire as a whole are minimum figures.

4.11 The 'actual delivery' figures illustrate the indicative nature of the local requirements. This is consistent with the discussion in the supporting text to Core Policy 2 of the Wiltshire Core Strategy which highlights the indicative nature of the requirement for each Area which are prefixed with 'about' or 'approximate' in the Area Strategy policies. The number of Areas with a negative residual requirement (i.e. where delivery and developable commitments meet or exceed the indicative requirement) demonstrates how the Council and Neighbourhood Plan groups are adopting the approach set out in the policy, and allowing for proposals for sustainable development even where it would result in indicative requirements being exceeded.

4.12 The extent to which delivery to date has met indicative housing requirements has been factored into the site selection process for each area. In order to bolster supply for the remaining plan period, the Plan focuses on addressing the need to allocate

<sup>17</sup> Totals for Southern Wiltshire CA remainder and Southern Wiltshire CA exclude any development at Old Sarum or extensions to Salisbury City, as these are classified as Salisbury.

additional sites to meet the housing requirements of each HMA, taking into account the indicative remaining requirements for each of the Community Areas.

- 4.13 Anticipated delivery from windfall is not a committed source of supply, and therefore a windfall allowance is not included within the figures in Table 5. However given historic delivery on windfall sites, the actual delivery against the indicative requirements for the Community Areas is likely to be greater than estimated.

## **5. COMPONENTS OF HOUSING SUPPLY**

- 5.1 The assessment of housing land supply is not an exact science. There are a number of sources of supply that need to be taken into consideration and the decision to include or exclude a component of supply is down to planning judgement based on the evidence available at the time. In Wiltshire the approach to the assessment of housing land supply is now well established, having been tested at the Wiltshire Core Strategy Examination and through numerous appeals.

- 5.2 The latest Housing Land Supply Statement (update published March 2017) includes the following components of supply:

- Sites with planning permission or prior approval
- Sites with resolutions to grant planning permission subject to a Section 106 agreement
- Saved Local Plan allocations (that have been reviewed and carried forward as part of the Wiltshire Core Strategy)
- Strategic site allocations within the adopted Wiltshire Core Strategy
- Strategic site allocations within the adopted Chippenham Site Allocations Plan
- Made (i.e. Adopted) Neighbourhood Plan allocations
- Emerging Neighbourhood Plan allocations (where the Neighbourhood Plan has passed through the Regulation 16 consultation stage.)
- A windfall allowance (in accordance with paragraph 48 of the National Planning Policy Framework).

- 5.3 Sites with planning permission, prior approval, or those with committee resolutions to grant permission are a regular source of supply and generally represent the sites most advanced in terms of delivering housing development. Sites in Local Plans, including the Wiltshire Core Strategy and Chippenham Site Allocations Plan, have been formally allocated by the Council, and offer certainty of suitability for development.

- 5.4 The contribution of neighbourhood planning and windfall development are less certain due to the nature of these sources. The contribution of these sources to the future supply are assessed below.



### **Neighbourhood plans**

- 5.5 In addition to the above, one of the clear challenges to address in preparing the Plan centres on the need to support, rather than stymie the delivery of housing through neighbourhood plans. There has been significant interest across Wiltshire in neighbourhood planning and, in line with Core Policies 1 and 2 of the Core Strategy, these type of plans will play a role in meeting the indicative housing requirements.
- 5.6 At the outset of Plan preparation, where neighbourhood plans have reached the examination stage, the Council has not sought to identify further housing sites. Progress on neighbourhood planning in other areas of the County has also been kept under review as preparation proceeds. How the Plan interacts with particular Neighbourhood Plans is explained in individual Community Area Topic Papers. Plan preparation thus serves to support neighbourhood plans already in preparation; and allow appropriate opportunity for dialogue with communities, who may be considering the preparation of such plans, to articulate their views on how settlements should grow.
- 5.7 However, it is recognised that in certain locations (particularly higher order settlements such as Principal Settlements, Market Towns and Local Service Centres) there may well be a need for the Council to take a strategic lead, by identifying sites to ensure that sufficient land is made available to maintain supply and market choice.
- 5.8 Equally, where neighbourhood plans are being developed that do not allocate sites for housing despite there being a requirement to be met in an area then, again, the Council may need to identify sites at those locations.
- 5.9 Further information on these matters can be found in Topic Paper 2: Site Selection Methodology, Topic Paper 4: Developing Plan Proposals as well as individual Community Area Topic Papers.

### **Windfall allowance**

- 5.10 Windfall sites are defined in the Glossary of the NPPF as *“Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.”*
- 5.11 Paragraph 48 states that a windfall allowance can form part of the 5-year deliverable supply if there *“is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.”*
- 5.12 The Planning Practice Guidance provides additional guidance on how a windfall allowance can be applied beyond the immediate 5 year period, based on a geographical area. It is considered an HMA could form such an area.

- 5.13 The Council has calculated a windfall allowance at HMA-level for the remainder of the Wiltshire Core Strategy plan period in line with the NPPF tests. This has been set out at HMA-level in the deliverable supply (years 1-5) and developable supply (years 6-15) since the introduction of the NPPF in 2012. This is explained in more detail in Appendix 5 of the 2016 HLSS update.
- 5.14 The windfall allowance in the 2016 HLSS update is calculated for an April 2016 base date position, and represents anticipated windfall for the remaining period of the Wiltshire Core Strategy (April 2016 to March 2026). However the land supply position used to inform this Plan uses an estimated April 2017 base date and applies from April 2017 to March 2026. As such the windfall allowance has been reduced accordingly to represent delivery over a 9 year period rather than 10 years. The windfall allowance used for each HMA in the estimated 2017 position is shown in Table 6 below.

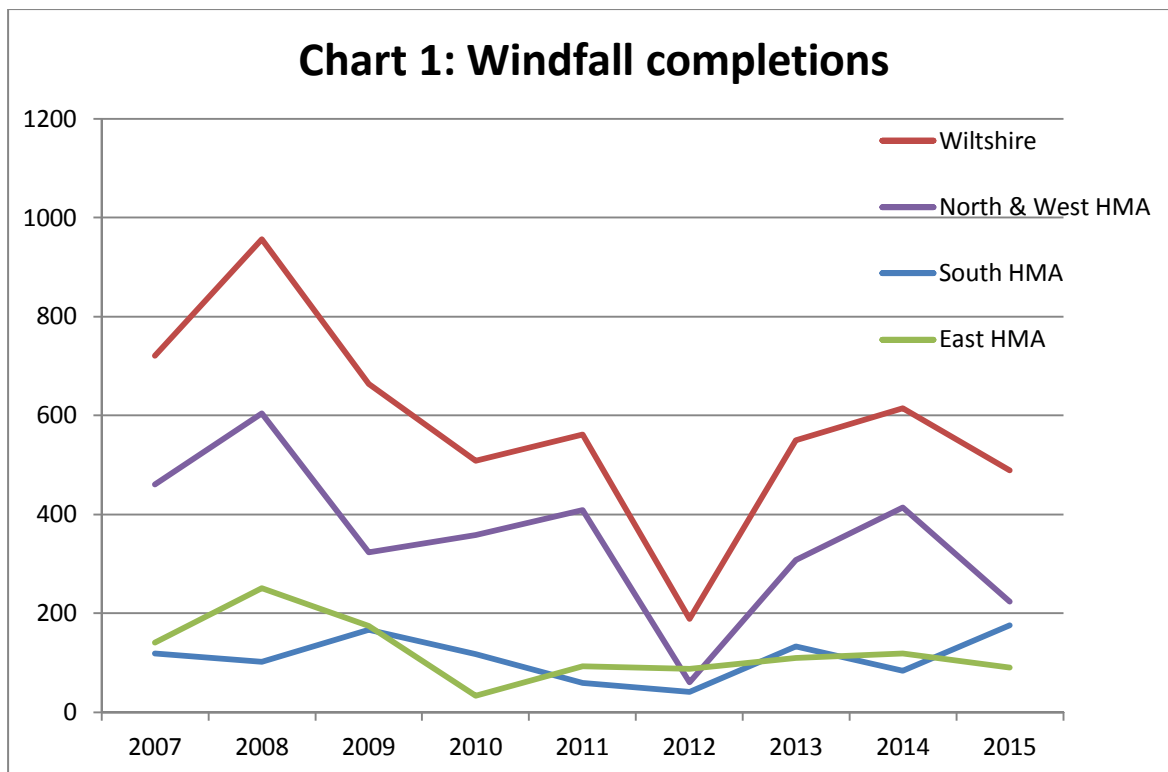
**Table 6: Anticipated windfall allowance (April 2017 – March 2026).**

Housing Market Area (HMA)	Windfall allowance (April 2017 – March 2026)
East Wiltshire HMA	811
North & West Wiltshire HMA	2086
South Wiltshire HMA	736

- 5.15 Completions data shows that during the Wiltshire Core Strategy period (2006-2015<sup>18</sup>) delivery of brownfield windfall sites have contributed **29%** of all housing completions. Chart 1 below<sup>19</sup> shows the pattern of delivery of such sites for each HMA and Wiltshire overall. It is considered that this figure warrants the inclusion of a windfall allowance, in accordance with the NPPF.

<sup>18</sup> Source: 2016 Housing Land Supply Statement (March 2017 update) - Appendix 5. This figure is based on non-allocated brownfield sites only.

<sup>19</sup> Source: 2016 Housing Land Supply Statement (March 2017 update)



5.16 The Council recognise that a windfall allowance is a further source of supply which contributes towards delivery of the indicative housing requirements. However in line with the Plan objective to provide surety of supply through allocations, the use of a windfall allowance should not be relied upon.

**Impact of recent and emerging Government policy and legislation**

5.17 A series of recent legislative and policy changes may affect the scope of the various sources of supply in the future.

Housing White Paper

5.18 The Government released a Housing White Paper in February 2017. This included a series of proposals which include tools aimed at increasing housing supply, a greater emphasis in favour of development on brownfield land at settlements, and development of small and medium sized sites. Many of the proposals build on previous Government consultations and reviews<sup>20</sup> – these are highlighted in the relevant section below. The intention is that many of the measures proposed are to be brought into policy during 2017 and early 2018 which is within the current timescales for examination and adoption of the Plan. These have been assessed as to its potential effect on the objectives of the Plan

<sup>20</sup> Housing White Paper - "Fixing our broken housing market" (DCLG, February 2017) Paragraph 1.5.



*(a) Housing delivery test*

- 5.19 This proposal was originally consulted on in the changes to national planning policy from December 2015 to February 2016, with the Government response published alongside the White Paper. It proposes a housing delivery test to ensure local authorities are accountable for their role in ensuring new homes are built in their area. It proposes an assessment of delivery against the housing requirement (set out in an up-to-date i.e. less than 5 year old development plan) in the past 3 monitoring years, beginning in November 2017.
- 5.20 Where delivery performance over this time period has fallen behind the corresponding housing requirement over that time, the local authority may have to apply a 20% buffer on its 5-year housing land supply. The implications of delivery falling behind housing requirements is already embedded in the operation of paragraph 47 of the NPPF which can also require the application of a 20% buffer on the local authority's 5-year housing land supply if under-delivery has occurred persistently.
- 5.21 Should the results of the housing delivery test necessitate applying a 20% buffer, this may in some instance affect the Council's ability to meet a 5-year housing land supply on an ongoing basis throughout the Plan period. This is discussed further in the 'Resilience testing' section of the Housing Market Area discussion in Topic Paper 4 – "Developing Plan Proposals".

*(b) Additional emphasis on delivery of brownfield sites*

- 5.22 This proposal also follows earlier consultation on amendments to national planning policy (December 2015). The Government will amend the NPPF to indicate great weight should be attached to the value of using suitable brownfield land within settlements for homes.
- 5.23 Core Policy 2 of the Wiltshire Core Strategy already includes a presumption in favour of sustainable development within defined settlement boundaries, and "prioritises the re-use of previously developed land to deliver regeneration opportunities, and to limit the need for development on Greenfield sites." The Council includes an allowance for windfall development in its housing land supply calculation based on brownfield sites in its calculation. The increased weight in national policy is a factor that may contribute to this trend continuing.
- 5.24 It also proposes to amend the NPPF to allow more brownfield land to be brought forward for starter home-led development. This includes tests to determine whether such proposals on under-used employment sites and other under-used brownfield land should be considered favourably. Core Policy 35 of the Wiltshire Core Strategy establishes criteria for the retention or reuse of existing employment sites and includes a test for whether the site has any long term or strategic requirement to remain in employment use. Thus local policy already caters for release of unviable employment land, which may be appropriate for starter home development.

*(c) Small and medium sized sites*

- 5.25 In the same way as the strengthened emphasis on brownfield sites the Government will amend the NPPF to expect local authorities to have policies that support the development of small 'windfall' sites, and indicate that great weight should be given to using small undeveloped sites within settlements that are suitable for residential development.
- 5.26 Wiltshire is a large, predominantly rural authority, with over 90 settlements with defined settlement boundaries (indicating the most sustainable locations for development.) As highlighted windfall delivery provides extensive contribution to delivery in Wiltshire, with a large proportion coming forward on small sites. These factors have provided, and it is expected will continue to provide, many opportunities for small-scale development. As set out above, Core Policy 2 of the Wiltshire Core Strategy already includes a presumption in favour of sustainable development within defined settlement boundaries. Topic Paper 4 explains to what degree the Plan and future land supply is dependent on windfall delivery.

Permission-in-principle / brownfield register

- 5.27 Permission-in-principle is a new form of planning permission brought into legislation in the Housing and Planning Act 2016. New planning measures in the Act include the requirement to formulate a register of land meeting a 'prescribed description', and the concept of 'permission-in-principle' which can be granted through a national or local development order on housing-led development, against sites on a register or allocated in development plans.
- 5.28 The first implementation of the permission-in-principle type of permission is a requirement for local authorities to compile a register of brownfield land meeting a list of criteria in their administrative area, and a separate Order by the Secretary of State granting permission-in-principle for sites on Part 2<sup>21</sup> of that register. These were brought into force in April 2017. The Council must publish the register by 31 December 2017.
- 5.29 This type of permission is likely to reduce the uncertainty of whether housing development is acceptable in principle on a particular site, and thus the cost to developers associated in achieving an outline permission on such a site. This in turn may improve the viability and attractiveness to release such a site onto the market.
- 5.30 The original consultation on changes to national policy aimed to achieve a target of planning permission being in place on 90% of suitable brownfield sites by 2020.<sup>22</sup> As statutory measures are now in effect, and additional weight being placed on redevelopment of brownfield land, this indicates a clear indication from the Government to develop this source of housing delivery.

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<sup>21</sup> Part 2 of the Brownfield Register are sites that the local authority wishes permission-in-principle to be made on, following statutory publicising and consultation.

<sup>22</sup> Housing and Planning Bill 2015 and DCLG "Consultation on proposed changes to national planning policy" (December 2015)

Release of public sector land (One Public Estate)

- 5.31 Wiltshire Council is participating in the One Public Estate initiative, a partnership between the Local Government Association and Cabinet Office. An objective of the programme is to release land held by public bodies that has been identified as surplus to requirements. This may include measures such as co-locating services, or releasing land to generate economic growth.
- 5.32 In recent years, the Council has identified land in its own portfolio for disposal. Examples include the former George Ward School, Melksham which has been granted permission for 261 homes and is currently under construction, and the former West Wiltshire District Council site at Bradley Road, Trowbridge which is currently under offer.

Permitted development changes

- 5.33 Since May 2013 a number amendments have been made to the General Permitted Development Order (GPDO) to reduce planning regulations regarding changes of use to a residential use. These now allow changes of use from a wide range of use classes to dwellings as permitted development, through a 'prior approval' process.
- 5.34 Since the first amendments came into effect (May 2013) until the end of the monitoring period ending March 2016, prior approval has been granted for a total of **165** residential units on brownfield sites in Wiltshire. A number of agricultural-to-residential approvals have also been granted which, in a predominantly rural authority such as Wiltshire, seems likely to continue.
- 5.35 The Government have signalled further intentions to continue the relaxation of permitted development rights. A ministerial statement published on 13 October 2015 announced the intention to allow the demolition of office buildings with replacement of residential buildings, also through a prior approval process. This has been reiterated more recently however is not included within the Housing White Paper. The Rural Planning Review (issued in February 2016) announced proposals to consult on a further right to allow conversion of agricultural buildings into up to 5 residential units to meet local needs.



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## **APPENDIX 5**

# **Wiltshire Housing Site Allocations Plan**

## **Topic Paper 4: Developing Plan Proposals**

June 2017





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Cabinet Version - Wiltshire Housing Site Allocations DPD: Topic Paper 4: Developing Plan Proposals

The Draft Plan has been published supported by the following Topic Papers:

Document	Purpose
Community Area Topic Papers	<p>Reports on stages 1 to 4a of the site selection process for each community area, including a summary of relevant outputs from stage 3.</p> <p>Reports on the process and outcome of settlement boundary review for each community area settlement</p>
Topic Paper 1: Settlement Boundary Review Methodology	Explains the process followed to review settlement boundaries and how it was developed
Topic Paper 2: Site Selection Process Methodology	Explains the process followed to select preferred sites and produce plan proposals
Topic Paper 3 : Housing land Supply	Provides the quantitative evidence for housing land requirements
Topic Paper 4 : Developing Plan Proposals F	Reports on how preferred sites affect housing land supply for each Housing Market Area in terms of meeting WCS requirements and the spatial strategy
Topic Paper 5 : Assessment of Viability	Tests the ability of sites to be developed, provide policy compliant levels of affordable housing and necessary infrastructure



## Topic Paper 4 : Developing Plan Proposals

### Introduction

- 1.1 Stages 1 to 4a of the site selection process involved the assessment of sites individually<sup>1</sup>. The assessment of sites promoted for development has involved looking at the characteristics of each one. Potential site options have been rejected and others that have better sustainability benefits have been taken forward. The conclusions of that work are reported in the individual community area topic papers.
- 1.2 The purpose of this topic paper is to look overall at the proposed allocations that have resulted to see how together they meet two objectives of the Plan:
- to help demonstrate a rolling five year supply of deliverable land for housing development.
  - to allocate sites at the settlements in the County that support the spatial strategy.
- 1.3 The paper carries out Stage 4b of the site selection process described in full in Topic Paper 2. It looks at each Housing Market Area (HMA) in turn in terms of these two objectives: Housing Land Supply and the Spatial Strategy.

### **Housing Land Supply - to help demonstrate a rolling five year supply of deliverable land for housing development**

- 1.4 The council needs to demonstrate a five year supply of deliverable land for each of the three Housing Market Areas (HMAs). The Plan should help sustain such a supply for each year over the plan period, to 2026. To help do this, the anticipated yearly completions of each site, when building starts and finishes, are all collated to forecast levels of supply (build out rates) for every year of the plan period. Compared to the implied rate of annual house building necessary to deliver the remainder of the HMA Core Strategy requirements, the result can be expressed as a number of years' worth of land supply.
- 1.5 It is difficult to predict rates of development with a high level of certainty because a number of issues can affect construction. Also, in Wiltshire, large mixed use sites ('strategic sites') are a significant component of land supply in each HMA and they can be complex and time consuming to deliver. Consequently, it is prudent to look beyond the required minimum to achieve a five year housing land supply and ensure a continuity of housing supply, as well to help ensure choice and competition in the market.

### **The Spatial Strategy - to allocate sites at the settlements in the County that support the spatial strategy**

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<sup>1</sup> Topic Paper 2: Site Selection Process Methodology provides a detailed description of the site selection process.

- 1.6 The scale and distribution of housing development at each settlement should also be consistent with that proposed by the spatial strategy in the Wiltshire Core Strategy (WCS). The role and function of a settlement may be frustrated if the supply of housing land is constrained. A lack of new housing and infrastructure could depress economic growth and could undermine the viability and vitality of town centres. Equally, widespread over provision, particularly toward smaller settlements, might undermine the spatial strategy. A symptom of this would be more travelling between settlements, less self-containment and more impact on the environment.
- 1.7 It would not, however, be reasonable to expect the distribution and scale of land supply to adhere rigidly to a given level. It would be unrealistic to expect as much. The WCS explains that the levels it suggests are indicative and that there needs to be some flexibility.
- 1.8 Levels of housing suggested for settlements and rural areas by the WCS are indicative in order to provide flexibility within each HMA. Figures are provided in the Area Strategy Policies at the Community Area level as well as for the Principal Settlements, Market Towns and, Local Service Centres in the South Wiltshire HMA. They are expressed as 'about' or 'approximate' figures and neither minimum or maximums; instead they are an indication of the general scale of growth appropriate for each area and settlement during the plan period. Levels of development at Large Villages are limited to that needed to help the housing needs of the settlement and figures for the rural areas are provided in Table 1 of the WCS.

## Housing Land Supply

### Context

- 2.1 There are considerable uncertainties affecting the supply and development of housing. Forecasting supply over a decade cannot be exact. National policy anticipates that the Council will boost significantly the supply of housing<sup>2</sup> and requires the Council to include an additional buffer over the need to demonstrate 5 years worth of housing land supply. The WCS sets requirements as a minimum amount of housing for each HMA. This all suggests planning for a generous supply of housing land, which is considered below.
- 2.2 The sustainable development of the County depends upon development being planned to manage environmental impacts, ensure economic growth and properly co-ordinate infrastructure provision. Developers commonly challenge the Council's approach to land supply in order to promote sites excluded from the development plan. This can create uncertainty around infrastructure provision and concern that less sustainable sites are being developed.
- 2.3 Therefore, to be sure of maintaining a five year housing land supply over each of the remaining years of the plan period, annual supply should exceed the five years and buffer required by planning policy<sup>3</sup>. Any target level will be arbitrary but the Plan might look to provide at least six years of supply in each of the remaining years of the plan period<sup>4</sup> (to allow for any possibility of under-delivery in future), but less where it can be safe to assume that reviews of the development plan will by then have brought forward additional site allocations to a point of sufficient certainty.

### Updating housing land supply

- 2.4 Stage 1 of the site selection process determined Areas of Search where the Plan should look to allocate sites for housing development. Areas of Search are generally those areas where currently dwelling completions and developable commitments fall short of the indicative requirements set out in the WCS. Information about dwelling completions and commitments, and therefore Areas of Search, derive from monitoring used to compile Housing Land Supply Statements (HLSS) published annually by the Council in the course of preparing the Plan. These have been updated and reviewed during Plan preparation.
- 2.5 The culmination of site selection carried out (Stage 4a, as reported in each Community Area Topic Paper) is a set of preferred site options that will become proposals of the

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<sup>2</sup> National Planning Policy Framework (NPPF), paragraph 47, DCLG, (Mar 2012)

<sup>3</sup> National Planning Policy Framework (NPPF), paragraph 47 states that Local Planning Authorities should "identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land", DCLG, (Mar 2012).

<sup>4</sup> National Planning Policy Framework (NPPF), paragraph 47 states "Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20%..." Six years supply is therefore the maximum requirement envisaged in national policy.



Plan. The context for this has been the most up-to-date housing land supply data possible; a forecast of the 2017 HLSS with a base date of 1 April 2017.

- 2.6 The Plan is intended for submission after 1<sup>st</sup> April and this is the appropriate baseline for Plan proposals. However a definitive set of data will not be available until the County is re-surveyed. The baseline used at this stage of the Plan is therefore a forecast of the April 2017 HLSS<sup>5</sup>. This housing data is realistic and relies on few assumptions. A more detailed technical explanation is provided in Topic Paper 3: Housing Land Supply.
- 2.7 The forecast 2017 data shows housing land supply **without** the allocations proposed in this Plan.
- 2.8 Forecast land supply in 2017 for each HMA, excluding windfalls, is as follows:

Housing Market Area	Minimum requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	Minimum to be allocated
East Wiltshire	5,940	3,497	2,273	170
North and West Wiltshire	24,740	12,603	11,566	571
South Wiltshire	10,420	5,067	4,759	594

Figure 1: Housing Market Area - Strategic Requirements

- 2.9 Forecast five year housing land supply in 2017 and for each remaining year of the plan period, including windfalls, is as shown in the two tables below<sup>6</sup>.

Housing Market Area	Housing requirement 2006-2026	Housing completions 2006-2017	Five year housing requirement 2017-2022	Deliverable supply 2017-2022	Number of years of deliverable supply
East Wiltshire	5,940	3,497	1,357	2,300	8.47
North and West Wiltshire	24,740	12,603	6,743	8,922	6.62
South Wiltshire	10,420	5,067	2,974	3,356	5.64

Figure 2: HMA Five Year Housing Land Supply - Baseline 2017

<sup>5</sup> A Revised HLSS was published in March 2017, in order to reflect the fact that allocations in the Chippenham Site Allocations Plan have passed examination and are proceeding to adoption using a base date of 1 April 2016. Since then, the Plan has been adopted (May 2017). The 2017 forecast (with a base date of 1 April 2017) starts from this Revised HLSS. In addition, the data estimates the number of dwellings completed since the 2016 but does not include estimates of planning permissions for small housing sites. More information is provided in Topic Paper 3: Housing Land Supply.

<sup>6</sup> In accordance with the National Planning Policy Framework, the Council apply the appropriate buffer to its 5-year supply. As the Council considers it requires a 5% buffer in each of its three HMAs, this equates to needing to show a 5.25 year supply of land to meet 5 years worth of requirement.

Year supply	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
East Wiltshire	8.47	8.18	8.32	10.11	13.64	10.79	8.21	6.29	4.94
North and West Wiltshire	6.62	6.80	6.81	6.55	6.48	6.11	5.42	4.60	3.82
South Wiltshire	5.64	5.57	5.42	5.35	5.28	5.13	4.59	3.83	2.97

Figure 3: HMA Five Year Housing Land Supply - Baseline (Annual Supply 2017-26)

## Testing Plan Proposals

### Resilience testing

2.10 The Council has tested the supply of housing land coming forward to see how well a five year supply can be maintained. This helps to indicate the robustness of supply. More importantly it also shows where efforts might need to be focussed in order for sufficient supply to be assured over the plan period.

2.11 Testing, using different scenarios, has envisaged four different types of circumstance:

- a. **Site delay** - large sites for housing, important to overall supply, fail to be implemented in the plan period. However, in undertaking monitoring, the Council engages with both house builders and land owners and detects site delays quickly. Experience shows that the complexity of delivering large sites can result in forecast start dates slipping. The latest housing trajectories now allow for this.

It is extremely unlikely that a whole site's contribution would be lost from housing supply before there was action by the Council to unblock obstacles to development or identify other land as a substitute. These 'worst case' scenarios for each HMA are therefore particularly severe tests of resilience.

- b. **Reliance on windfall** – National Planning Policy Framework (NPPF) allows Local Planning Authorities to include an allowance for windfall in their estimates for housing that will be built on unidentified sites. The allowances provided for each HMA in the Council's estimates are evidenced by past levels. It provides greater certainty since the Plan does not depend on windfall housing development in order to achieve the minimum HMA requirements. Supply has been tested to see whether meeting requirements relies on a windfall contribution.
- c. **Persistent under delivery** – NPPF requires a larger land supply where there has been persistent under-delivery (a 20% buffer rather than 5%). While under-delivery has not taken place in any of the County's HMAs and this view has been consistently supported at planning appeals, it would be prudent to aim to have a 20% buffer.
- d. **A backlog of housing provision** - If there is a backlog of housing that has accrued against the requirement, there are two ways this can be addressed. These are known as the 'Liverpool' and 'Sedgefield' approaches:
  - The '*Liverpool approach*' is to seek to meet this backlog over the whole plan period. It is also known as the residual approach.
  - The '*Sedgefield approach*' is to front load the provision of this backlog so it is rectified within the next five years.

The resilience of housing land supply has been tested against both methods.

Planning decisions in Wiltshire have used the 'Liverpool approach' because delivery of housing in the County is dependent upon a number of Strategic Allocations which are anticipated to be delivered in whole or part beyond the next five year time period. The WCS Inspector accepted the redistribution of shortfalls over the remaining plan period. Since then other Inspectors considering Section 78 appeals have not departed from the WCS Inspector's acceptance of the Liverpool approach.

2.12 Once the resilience of supply has been tested, this supports separate conclusions for each HMA on two important aspects:

- Whether to allocate sites at Large Villages?
- What housing sites are crucial to ensuring a surety of supply?

### **Whether to allocate sites at Large Villages?**

2.13 Neighbourhood Plans are an important part of the planning system. The National Planning Policy Framework (NPPF) describes their role:

*"Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need. Parishes and neighbourhood forums can use neighbourhood planning to:*

*set planning policies through neighbourhood plans to determine decisions on planning applications..."<sup>7</sup>*

2.14 The Council supports passing direct powers over planning to local communities as a part of building up the resilience of local communities.

2.15 Referring to the role of Local Plans prepared by the Council the NPPF states:

*"Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:*

*the homes and jobs needed in the area ..."<sup>8</sup>*

2.16 It is only necessary for this Plan to allocate land for housing development where it is a strategic priority to do so. WCS Core Policy 1 proposes that development at Large Villages should be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. Unless there is a strategic priority to deliver the homes needed in an HMA, then the most appropriate means to assess local needs and plan growth at each Large Village is through the neighbourhood planning process. Topic Paper 3: Housing Land Supply already indicates that there is no need to plan for Large Villages in the East Wiltshire HMA. This Paper reviews that position taking into consideration the proposed allocations and considers, for each HMA, whether that strategic priority exists.

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<sup>7</sup> National Planning Policy Framework, DCLG, March 2012 para 183

<sup>8</sup> National Planning Policy Framework, DCLG, March 2012 para 156



**What housing sites are important to ensuring a surety of supply?**

- 2.17 Knowing which housing sites are most important to maintaining supply helps the Council to resolve potential issues ahead of costly delays and to co-ordinate actions that help to support their delivery.
- 2.18 The WCS allocates a number of large mixed use sites for development over the plan period. Evidence to date shows that several strategic sites proposed in the WCS are failing to be developed to the timescales originally envisaged, despite Council and developer aspirations to do so, because of the complexities involved. Another concern voiced is that sites are simply land-banked by volume house builders for construction at a later date.
- 2.19 Strategic sites also provide land for employment development and important infrastructure necessary to support growth. They are an important source of affordable homes if the Council is going to meet targets set in the WCS. There are wider implications if the development of one or other site is significantly delayed.
- 2.20 There are also implications in terms of ensuring an adequate supply of housing land. Testing the resilience of supply has considered this issue and helped to identify those sites that are the most important in each HMA.
- 2.21 Specific risks to delivery associated with those identified sites can be recorded in a risk register to support the implementation of the Plan. A part of monitoring the effectiveness of the Plan will be to maintain this risk register.
- 2.22 This Paper identifies, for each HMA, those sites in this Plan and the WCS that are particularly important to ensuring sufficient housing land supply.

## The Spatial Strategy

### Context

3.1 The WCS presents a settlement strategy for managing growth over the period up to 2026. The strategy establishes tiers of settlements based on an understanding of their role and function; and how they relate to their immediate communities and wider hinterland.

3.2 Core Policy 1 of the WCS identifies five categories of settlements, namely:

- Principal settlements
- Market towns
- Local service centres
- Large villages
- Small villages

3.3 The table below sets out the relationship between each tier of the settlement strategy and the expected level of development under Core Policy 1.

Settlement	Level of development
Principal settlement	The primary focus for development and will provide significant levels of jobs and homes
Market town	Have the potential for significant development that will increase the number of jobs and homes to help sustain/enhance services and facilities and promote self-containment and sustainable communities
Local service centre	Modest levels of development to safeguard their role and deliver affordable housing
Large village	Development limited to that needed to help meet the housing needs of settlements and improve housing opportunities, services and facilities
Small village	Some modest development may be appropriate to respond to local needs and contribute to the vitality of rural communities but limited to infill

Figure 4: Settlements and levels of development

3.4 Core Policy 2 of the WCS proposes a minimum housing requirement for each HMA as follows:

Housing Market Area (HMA)	Minimum housing requirement (dwellings)
East Wiltshire	5,940
North and West Wiltshire	24,740
South Wiltshire	10,420

Figure 5: HMA Minimum housing requirements

3.5 Table 1 at Paragraph 4.26 together with Area Strategy Policies (Section 5) of the WCS show indicative local housing requirements for settlements, community area remainders and community areas, as follows:

Area	Indicative requirement 2006-2026
Devizes	2,010
Devizes CA remainder	490
Devizes CA Total	2,500
Marlborough	680
Marlborough CA remainder	240
Marlborough CA Total	920
Pewsey CA	600
Tidworth and Ludgershall	1,750
Tidworth CA remainder	170
Tidworth CA Total	1,920
<b>EAST WILTSHIRE HMA TOTAL</b>	<b>5,940</b>
Bradford on Avon	595
Bradford on Avon CA remainder	185
Bradford on Avon CA Total	780
Calne	1,440
Calne CA remainder	165
Calne CA Total	1,605
Chippenham	4,510
Chippenham CA remainder	580
Chippenham CA Total	5,090
Corsham	1,220
Corsham CA remainder Total	175
Corsham CA Total	1,395
Malmesbury	885
Malmesbury CA remainder	510
Malmesbury CA Total	1,395
Melksham and Bowerhill	2,240
Melksham CA remainder	130
Melksham CA Total	2,370
Royal Wootton Bassett	1,070



Area	Indicative requirement 2006-2026
Royal Wootton Bassett and Cricklade CA remainder <sup>9</sup>	385
Royal Wootton Bassett and Cricklade CA <sup>5</sup> Total	1,455
Trowbridge	6,810
Trowbridge CA remainder	165
Trowbridge CA Total	6,975
Warminster	1,920
Warminster CA remainder	140
Warminster CA Total	2,060
Westbury	1,500
Westbury CA remainder	115
Westbury CA Total	1,615
<b>NORTH &amp; WEST WILTSHIRE HMA TOTAL</b>	<b>24,740</b>
Amesbury, Bulford and Durrington	2,440
Amesbury CA remainder	345
Amesbury CA Total	2,785
Mere	235
Mere CA remainder	50
Mere CA Total	285
Salisbury	6,060
Wilton	
Wilton CA remainder	255
Salisbury and Wilton CAs Total	6,315
Downton	190
Southern Wiltshire CA remainder	425
Southern Wiltshire CA Total	615
Tisbury	200
Tisbury CA remainder	220
Tisbury CA Total	420
<b>SOUTH WILTSHIRE HMA TOTAL</b>	<b>10,420</b>

Figure 6: Community Area Indicative Requirements

3.6 Paragraph 4.30 of the WCS makes clear however that:

<sup>9</sup> Totals for Royal Wootton Bassett & Cricklade CA remainder and Royal Wootton Bassett & Cricklade CA exclude any development at the West of Swindon.

*“The disaggregation to Community Areas set out above is not intended to be so prescriptive as to be inflexible and potentially ineffective in delivering the identified level of housing for each market area. It clarifies the council’s intentions in the knowledge of likely constraints in terms of market realism, infrastructure and environmental capacity. They provide a strategic context for the preparation of the Housing Sites Allocation DPD and in order to plan for appropriate infrastructure provision.”*

3.7 There are a number of sources for new homes to meet the requirements of Core Policy 2<sup>10</sup>. They include:

- strategic allocations made within the WCS
- retained Local Plan allocations
- existing commitments
- regeneration projects, for example, those in Chippenham, Trowbridge and Salisbury
- neighbourhood plans
- windfall sites

3.8 Sites identified in the Plan supplement housing land supply providing not just an additional number of homes but increasing choice of location and housing types.

### **Consistency with the Spatial Strategy**

3.9 The Plan is being prepared to be consistent with the WCS. It implements the spatial strategy of the WCS and does not review the role and function of settlements summarised above or indicative levels of growth.

3.10 The Plan allocates land to help ensure the delivery of the HMA housing requirements and in doing so the indicative distribution of new homes intended by the WCS from 2006 to 2026. At this point in the plan period a good proportion of homes have either already been built or are committed to be built by resolutions to grant planning permissions or allocations already made. The site selection process generally focuses on those areas and settlements that would benefit from the allocation of additional land to provide a plan-led approach where current land supply does not match indicative requirements. The scale of a shortfall is termed a ‘residual indicative requirement’ and the locations for additional supply ‘Areas of Search’.

3.11 Each Community Area Topic Paper concludes, where necessary (i.e. where supply should be provided for through this Plan), with a set of proposed allocations at individual settlements. The total amount of housing that they can deliver is intended to meet the residual housing requirement for the HMA (see Figure 1).

3.12 Given the Government’s objective to boost housing supply, the residual indicative requirement is not treated as a ceiling to cap development but more of a guide to inform an appropriate level of growth. They are neither maxima nor minima. However

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<sup>10</sup> See Topic Paper 3: Housing Land Supply

at Large Villages development clearly in excess of what is meeting local need may not necessarily be acceptable, as it could conflict with WCS Core Policy 1 (see paragraphs 2.13 to 2.16) .

3.13 Tables for each HMA compare the indicative housing requirements of rural and urban parts of each community area with likely actual levels of housing development that will take place over the plan period once allocations in this Plan are accounted for. The information is presented in this way to reflect the different emphasis of the spatial strategy.

3.14 The discussion that follows focuses on those areas and settlements where there is either still likely to be a shortfall of housing land or where more land is being identified than suggested by the spatial strategy.

3.15 For each HMA in turn the purpose is to:

- determine whether or not the Plan is in general conformity with the WCS and consistent with the spatial strategy; and
- suggest steps to resolve a shortfall where housing delivery at a settlement looks as if it will not meet levels intended. It will be for measures and other plans outside of the Plan to consider these in more detail. The relevant Community Area Topic Paper describes constraints that prevent a residual requirement being met.



## East Wiltshire Housing Market Area

### Housing requirement

- 4.1 Information about planning permissions, dwelling completions and current plan allocations in the Housing Market Area (HMA) over the plan period so far (2006-2017), excluding any allowance for windfall, shows that land for a further 170 dwellings would meet the minimum required by WCS Core Policy 2.

Housing Market Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	Minimum to be allocated
East Wiltshire	5,940	3,497	2,273	170

Figure 7: East Wiltshire HMA - Housing Requirement

### Summary of Proposals

- 4.2 There is no strong strategic priority for allocating land at Large Villages in the HMA and no sites are proposed due to the strength of supply overall<sup>11</sup>. There is a small shortfall and, unlike the two other HMAs, a forecast rolling supply 20% in excess of five years for all the remaining years of the plan period except the last. Housing may be brought forward to meet needs for affordable homes under WCS Core Policy 44 and local communities may bring forward housing proposals to meet local needs by preparing Neighbourhood Plans.
- 4.3 Allocations are proposed that help ensure that settlements (Market Towns and Local Service Centres) in the HMA, fulfil roles defined for them in Core policy 1 of the WCS and the Area Strategies that are beyond solely meeting local needs<sup>12</sup>. These settlements are:

Areas of Search		Settlement
Tidworth and Ludgershall	Market Town	Ludgershall
Devizes Community Area Remainder	Local Service Centre	Market Lavington

Figure 8: East HMA - Areas of Search

- 4.4 Allocating land for housing at these settlements helps to deliver the spatial strategy of the WCS.
- 4.5 Ludgershall, alongside Tidworth, is defined as a Market Town that the WCS considers to have the potential for significant development and increasing the number of homes helps sustain and enhance services and facilities as well promote resilience and self-containment.
- 4.6 The WCS designates the role of Market Lavington as a Local Service Centre (LSC). They are defined as smaller towns and large villages that can provide the best opportunities outside Market Towns for greater self-containment. As such, modest

<sup>11</sup> See Topic Paper 3: Housing Land Supply

<sup>12</sup> See Wiltshire Core Strategy Core Policies 12, 14, 18 and 26

levels of development are suitable to safeguard their role and deliver affordable housing.

- 4.7 Informed by recommendations of sustainability appraisal and the input of specialist stakeholders site options were selected and developed further to create the following set of plan allocations at settlements within areas of search:

Settlement	Site Name	Approximate dwellings
Market Lavington	Southcliffe	15
	Underhill Nursery	50
	East of Lavington School	15
Ludgershall	Empress Way	270 <sup>13</sup>

Figure 9: East Wiltshire HMA - Plan allocations<sup>14</sup>

## Housing Land Supply

- 4.8 Excluding an allowance for windfall, anticipated land supply in the East Wiltshire HMA compared to strategic requirements, in terms of numbers of dwellings, is as follows:

HMA	Housing requirement 2006-2026	Housing completions 2006-2017	Commitments (2017-2026)	Plan Allocations (2017-2026)	TOTAL	Surplus
East Wiltshire	5,940	3,497	2,273	241	6,011	71

Figure 10: East Wiltshire HMA - Housing provision

- 4.9 The scale of housing more than meets requirements for the HMA for the plan period. At the baseline date of 1 April 2017 the supply of deliverable land<sup>15</sup> (land capable of being built in the next five years) for housing development is well in excess of five years with an additional 5% buffer.

HMA	Housing requirement 2006-2026	Housing completions 2006-2017	Five year housing requirement 2017-2022	Deliverable supply 2017-2022	Number of years of deliverable supply
East Wiltshire	5,940	3,497	1,357	2,493	9.18

Figure 11: East Wiltshire HMA - Five year land supply 2017

- 4.10 Estimates show that housing land supply in excess of five years with an additional 20% buffer will be achieved each year until the end of the plan period.

Year supply	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
East Wiltshire	9.18	9.11	9.75	12.20	22.44	20.18	14.01	9.81	7.45

<sup>13</sup> This total includes 109 dwellings that already have planning permission

<sup>14</sup> For further information about individual Plan allocations refer to the relevant Community Area Topic Papers

<sup>15</sup> To be considered deliverable, sites should be available now, offer a suitable location for development, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.

Figure 12: East Wiltshire HMA - Five year land supply 2017 - 2026

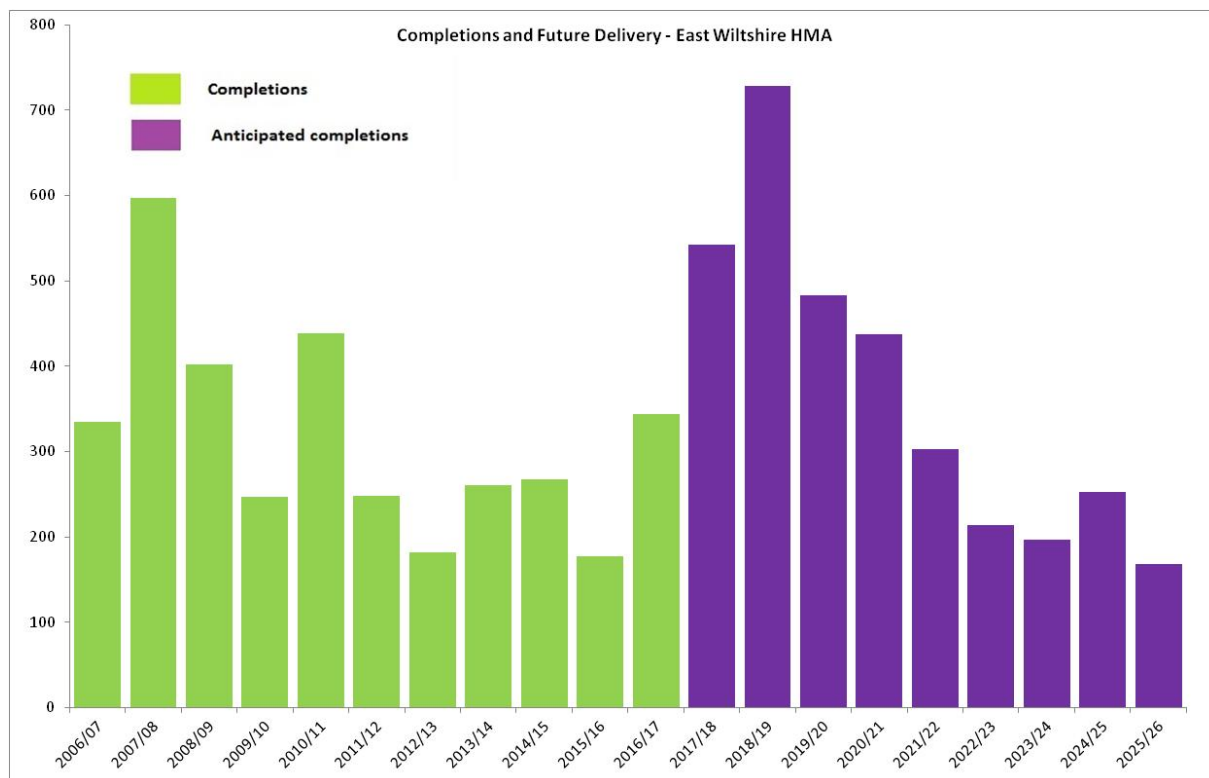


Figure 13: Completions and Future Delivery - East Wiltshire HMA

*Resilience testing*

4.11 The results of resilience testing also show that supply should remain in excess of requirements.

Test		Result
A	Site delay	<p>The impact of significant delays in the development of two large allocations<sup>16</sup> would have the effect of removing one and a half to two years worth of deliverable supply for the HMA as a whole.</p> <p>In the same scenario, deliverable land supply would still remain in excess of five years for each year until 2022/23. Neighbourhood Plans would also provide for additional sites for housing development. By this time annual monitoring would have triggered a response and additional land for housing development could be addressed through review of the WCS.</p>
B	Reliance on windfall	<p>Figure 10 shows that meeting minimum HMA housing requirements does not rely on housing contributed from windfall.</p>

<sup>16</sup> The scenario modelled the effect of Drummond Park, Ludgershall and Riverbourne Fields, Tidworth, remaining undeveloped.



C	Persistent under-delivery	<p>There has been no persistent under-delivery. Nonetheless, deliverable land supply provides a buffer in excess of 20% for the whole of the plan period.</p> <p>Over the first half of the Plan period, average housing completions have been very slightly higher than the rate envisaged; 318 dwellings compared to an annualised HMA housing requirement of 297 dwellings per annum. There was a marked difference between the first and second five years of the Plan period (2006-2010 compared to 2011-2015). The latter five years have recorded completions below the implied Core Strategy rate following the recession. This is anticipated to change according to site housing trajectories to levels averaging above 300 dwellings per annum.</p>
D	A backlog of development	There has been no backlog of housing development in the HMA.

*Whether to allocate sites at Large Villages?*

4.12 The baseline information also shows a reasonable surety of supply without any further land being allocated (see Figure 3). Most years supply exceeds 7 years' worth. There is no reliance on windfall to meet the minimum scale of development planned for the HMA.

4.13 Even were there serious delays in the development of important sites there would be a suitable supply until 2022/23. Additional allocations at Ludgershall and Market Lavington to support their growth and fulfil their role in the spatial strategy, extends surety of supply to the end of the plan period and confirms that allocations for housing at Large Villages in the HMA is unjustified. The Plan maintains a surety of land supply.

*What housing sites are important to ensuring a surety of supply?*

4.14 Main components of the increase in housing development over the next five years are anticipated to be the sites at Riverborne Fields, Tidworth and Drummond Park in Ludgershall. They are a large part of the area's long term growth. By themselves they are anticipated to provide about a third of all the year's new dwellings in the entire HMA during expected peaks in building (2017-2021), see Figure 13.

**Spatial Strategy**

4.15 The table below compares indicative requirements with proposed levels of growth in each area including the allocations proposed for inclusion in the Plan and this is followed by a consideration of where there are variations from the intended distribution indicated in the spatial strategy of the WCS. The Plan must be in general conformity with the WCS.

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	TOTAL	% Variation
<b>Urban areas</b>					
Devizes	2,010	1,447	689	2,136	6.3%
Marlborough	680	357	306	663	-2.6%
Tidworth and Ludgershall	1,750	728	1,109	1,836	5.0%
<b>TOTAL</b>	<b>4,440</b>	<b>2,532</b>	<b>2,103</b>	<b>4,635</b>	<b>4.4%</b>
<b>Rural areas</b>					
Devizes CA remainder	490	286	182	468	-4.5%
Marlborough CA remainder	240	160	46	206	-14.1%
Pewsey CA	600	426	179	605	0.9%
Tidworth CA remainder	170	93	3	96	-43.5%
<b>TOTAL</b>	<b>1,500</b>	<b>965</b>	<b>410</b>	<b>1,375</b>	<b>-8.3%</b>

Figure 14: East Wiltshire HMA - Fit with spatial strategy

- 4.16 The overall pattern of growth is in general conformity with the WCS. It is consistent with the principles of the spatial strategy. Compared to indicative levels, development is focussed slightly more on the market towns (+4%) and less on the rural settlements (-8%).
- 4.17 Indicative levels of housing for Market Towns are not a ceiling and a variance would not seem to present new or significant issues for local infrastructure and environmental capacity. Estimates show a very minor shortfall at Marlborough that will be easily bridged by minor redevelopment schemes over the plan period.
- 4.18 Similarly, variations from the spatial strategy do not appear to give rise to significant issues. The rural area around Tidworth contains two designated Large Villages. Collingbourne Ducis has experienced above average growth since 2006. This would seem sufficient to help maintain its role. Netheravon has several brownfield sites under consideration for redevelopment outside of this Plan. There is therefore scope to meet local needs in accordance with the spatial strategy. These possibilities would be best explored through a neighbourhood planning process, if desired by the local community, and would not, in any event fall to be allocated through this Plan.
- 4.19 A number of rural communities within the HMA are developing a local vision for the sustainable development of their settlement using neighbourhood planning<sup>[1]</sup>. These can address local needs, including needs for new homes, and they will progress further allocations to include housing that will contribute to supply. Neighbourhood plans will be a main means to sustain the roles of Large and Small Villages described in the spatial strategy.
- 4.20 The distribution of housing development accords with the underlying principles of the WCS to direct development to the most suitable, sustainable locations.

<sup>[1]</sup>Community Area Topic Papers summarise progress on neighbourhood planning.

## North and West Wiltshire Housing Market Area

### Housing Requirement

- 5.1 Information about planning permissions, dwelling completions and current plan allocations in the housing market area over the plan period so far (2006-2017) excluding any allowance for windfall shows that land for a further 571 dwellings would meet the minimum required by WCS Core Policy 2.

Housing Market Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	Minimum to be allocated
North and West Wiltshire	24,740	12,603	11,566	571

Figure 15: North and West Wiltshire HMA - Housing requirement

- 5.2 Developable commitments includes land allocated for large scale mixed use sites in the Chippenham Site Allocations Plan as well as several similar 'strategic sites' proposed in the WCS where construction has yet to commence. It was considered necessary to assess options at community area remainders containing Large Villages where additional growth through the Plan could be justified because of the scale of the requirement remaining to be met and the need to improve the five year land supply position across the Plan period.

### Summary of Proposals

- 5.3 Plan allocations are focussed on Areas of Search to help ensure that the remaining requirement for the HMA can be met. These are Principal Settlements and Market Towns and their rural hinterland, the 'community area remainder'; where it was considered necessary to identify additional land at Large Villages<sup>17</sup> in order to promote surety of supply and help achieve the minimum level set for the HMA in the WCS.
- 5.4 Plan allocations also supplement supply in order to help meet the indicative levels of development suggested by the Spatial Strategy of the WCS and fulfil the strategic role of settlements defined for them in Core Policy 1 of the WCS and the Area Strategies<sup>18</sup>.
- 5.5 Areas of search in the North and West Wiltshire HMA where site allocations are necessary to supplement supply are:

Areas of Search	
Chippenham Community Area remainder	Large Villages
Malmesbury Community Area remainder	Large Villages
Trowbridge	Principal Settlement
Warminster	Market Town
Warminster Community Area	Large Villages
Westbury Community Area	Large Villages

Figure 16: North and West Wiltshire HMA - Areas of Search

<sup>17</sup> Cricklade is the sole Local Service Centre in the North and West Wiltshire HMA. There was no indicative residual requirement for additional housing in the Community Area within which it is located.

<sup>18</sup> See Wiltshire Core Strategy Core Policies 7, 8, 10, 11, 13, 15, 19, 29, 31 and 32.



5.6 Informed by recommendations of sustainability appraisal and the input of specialist stakeholders site options were selected and developed further to create the following set of proposed plan allocations at settlements within areas of search:

Settlement	Site Name	Approximate dwellings
Hullavington	The Street	50
Yatton Keynell	East of Farrells Field	30
Crudwell	Ridgeway Farm	50 <sup>19</sup>
Trowbridge	Elm Grove Farm	200
	Church Lane	45
	Upper Studley	20
	Land off the A363 at White Horse Business Park	150
	Southwick Court	180
	Elizabeth Way	205
Warminster	East of the Dene	100
	Bore Hill Farm	70
	Boreham Road	30
Chapmanslade	Barbers Farm Nurseries	35
Bratton	Court Orchard / Cassways	40

Figure 17: North and West HMA - Plan allocations

5.7 In terms of the scale of housing development, Trowbridge, as a Principal Settlement, is the main focus for allocations in this Plan (66% of the HMA's proposed allocations). The rural parts of the HMA and the Market Town of Warminster make up the remainder.

## Housing Land Supply

5.8 Excluding an allowance for windfalls, anticipated land supply in the North and West Wiltshire Housing Market Area compared to strategic requirements, in terms of numbers of dwellings, is as follows:

HMA	Housing requirement 2006-2026	Housing completions 2006-2017	Commitments (2017-2026)	Plan Allocations (2017-2026)	TOTAL	Surplus
North and West Wiltshire	24,740	12,603	11,566	1,195	25,364	624

Figure 18: North and West Wiltshire HMA - Housing provision

5.9 The scale of housing more than meets requirements for the HMA for the plan period. At the baseline date of 1 April 2017 the supply of deliverable land for housing development (land capable of being built in the next five years) is well in excess of the minimum requirement of five years with an additional 5% buffer.

<sup>19</sup> This total includes 10 dwellings that already has planning permission

HMA	Housing requirement 2006-2026	Housing completions 2006-2017	Five year housing requirement 2017-2022	Deliverable supply 2017-2022	Number of years of deliverable supply
North and West Wiltshire HMA	24,740	12,603	6,743	9,643	7.15

Figure 19: North and West Wiltshire HMA - Five year land supply 2017

5.10 Estimates show that housing land supply in excess of five years and a 20% buffer can be achieved each year over nearly all the plan period. Just in the last year of the plan period will five year supply be met with a 5% buffer.

Year supply	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
North and West Wiltshire HMA	7.15	7.54	7.64	7.54	7.85	7.92	7.48	6.54	5.30

Figure 20: North and West Wiltshire HMA land supply 2017 – 2026

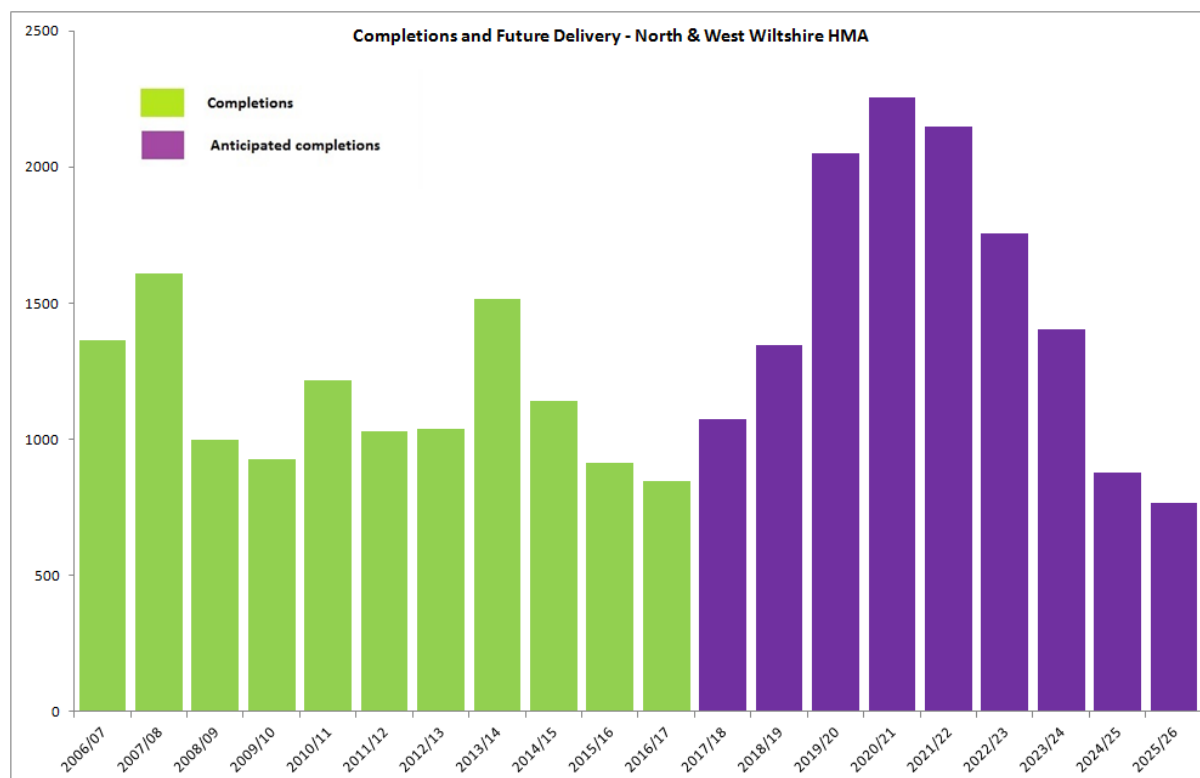


Figure 21: Completions and Future Delivery - North and West Wiltshire HMA

*Resilience testing*

Test	Result
A Site delay	Through the remainder of the Plan period over a quarter of new dwellings are anticipated to be built on strategic sites and plan allocations that currently do not have planning permission. It is sensible to consider the effect of a pessimistic scenario around this source of supply Resilience testing has used a scenario that just under a half

		<p>of the supply from this source does not materialise during the Plan period<sup>20</sup>.</p> <p>The impact of significant delays in the development of large allocations in this scenario would have a modest immediate impact with the effect of removing six months worth of deliverable supply for the HMA as a whole. The impact becomes more telling only later into the plan period when the affected sites had been expected to come 'on stream'. A five year supply falls to four and a half years in 2022/23 but before that supply is maintained with a sufficient buffer. By 2022/23 is sufficient time for additional land to be allocated through review of the WCS.</p> <p>Land supply is therefore resilient to a severe extent of sites being delayed.</p>
B	Reliance on windfall	Figure 18 shows that meeting minimum HMA housing requirements does not rely on the delivery of housing contributed from windfall.
C	Persistent under-delivery	<p>Completions over the plan period have averaged over 90% of the annualised HMA housing requirement.</p> <p>WCS strategic sites have been emerging over this period and will make a significant contribution to land supply but have made little significant contribution in the first half of the Plan. They are only now making a more serious contribution.</p> <p>In the past five years overall completions have continued to be just below the average annualised HMA figure. In one year completions have substantially exceeded the requirement, but the rates of development in this period are slightly lower than the first five years of the plan period (2006-2010).</p> <p>Falling slightly short of annualised rates can imply that there is vulnerability in the surety of supply. It would however be incorrect to say that there has been persistent under delivery of housing in the HMA.</p> <p>Deliverable land supply provides a buffer in excess of 20% for the plan period up until the final year of the plan period.</p> <p>Land supply is resilient to testing against persistent under delivery.</p>
D	A backlog of development	There is no serious backlog of housing development accruing over the plan period for the HMA because rates of construction are only slightly below the implied rate of development.

<sup>20</sup> Resilience testing assumed no development at Ashton Park, Trowbridge (because it is the largest site in the HMA) and also no dwellings built on this Plan's allocations at Trowbridge



		<p>Consequently, applying the alternative Sedgefield approach has only a minor impact on forward estimates of land supply over the remainder of the plan period. In terms of measuring deliverable land supply in years, it reduces the amount by less than half a year and would still mean an excess of six years supply up until 2025/26.</p>
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*Whether to allocate sites at Large Villages?*

- 5.11 There is a significant reliance on large strategic housing sites to meet strategic requirements in the HMA. This has contributed to rates of development in recent years not reaching the rates of development implied by the WCS requirement for the HMA. Strategic sites allocated in the WCS are now beginning to play a much more substantial role in housing growth and this is set to expand in the coming years.
- 5.12 It would however be unwise to place too much reliance on this being the case when some key strategic sites have yet to gain planning permission. The Plan should therefore look to allocate sites that can help to ensure a surety of supply. This is a justification for allocating sites for housing development to meet local needs at Large Villages where indicative requirements are not being met and there is not enough certainty that neighbourhood plans will provide for sufficient housing.

*What housing sites are important to ensuring a surety of supply?*

- 5.13 The WCS allocation at Ashton Park, South East Trowbridge is the largest single site within the HMA. More than one in ten of all new dwellings in the HMA are expected to be built on this one site over the remaining years of the plan period. It is self-evidently important to ensuring a surety of supply, and a site where planning permission has yet to be granted and a master plan agreed.
- 5.14 Rawlings Green, Chippenham is an allocation for mixed use development including up to 650 new dwellings, which is subject to a planning application. Other significant strategic sites, however, do have planning permission and will be developed in accordance with agreed master plans. This includes land at the West Warminster Urban Extension and South West Chippenham sites.

**Spatial Strategy**

- 5.15 The table below compares indicative requirements with proposed levels of growth in each area including the proposed allocations and this is followed by a consideration of where there are variations from the intended distribution indicated in the spatial strategy of the WCS. The Plan must be in general conformity with the WCS.

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	TOTAL	% Variation
<b>Urban areas</b>					
Bradford on Avon	595	387	212	599	1%
Calne	1,440	961	807	1,768	23%
Chippenham	4,510	1,204	3,819	5,023	11%
Corsham	1,220	646	587	1,233	1%
Malmesbury	885	560	455	1,015	15%
Melksham and Bowerhill	2,240	1,370	1,221	2,591	16%
Royal Wootton Bassett	1,070	997	158	1,155	8%
Trowbridge	6,810	2,965	2,625	5,590	-18%
Warminster	1,920	603	1,055	1,658	-14%
Westbury	1,500	877	931	1,808	21%
<b>TOTAL</b>	<b>22,190</b>	<b>10,570</b>	<b>11,871</b>	<b>22,441</b>	<b>1%</b>
<b>Rural areas</b>					
Bradford on Avon CA remainder <sup>1</sup>	185	119	72	191	3%
Calne CA remainder	165	92	153	245	49%
Chippenham CA remainder	580	409	113	522	-10%
Corsham CA remainder	175	255	96	351	101%
Malmesbury CA remainder	510	336	144	480	-6%
Melksham CA remainder	130	101	38	139	7%
Royal Wootton Bassett and Cricklade CA remainder <sup>2</sup>	385	315	150	465	21%
Trowbridge CA remainder	165	255	23	278	69%
Warminster CA remainder	140	90	53	143	2%
Westbury CA remainder	115	61	47	108	-6%
<b>TOTAL</b>	<b>2,550</b>	<b>2,033</b>	<b>890</b>	<b>2,923</b>	<b>15%</b>

Figure 22: North and West Wiltshire HMA - Fit with spatial strategy

- 5.16 There are marked differences in the anticipated growth of Calne and Westbury over the plan period compared to the two Principal Settlements of the HMA, Chippenham and Trowbridge.
- 5.17 Growth at Chippenham and Trowbridge has not matched expectations in terms of rates of house building so far over the plan period. As Principal Settlements within the HMA they are intended to be the primary focus for development, providing significant levels of jobs and homes.
- 5.18 In contrast, rates of development at most Market Towns have met expectations and at Bradford on Avon, Calne, Malmesbury, Melksham, Royal Wootton Bassett and Westbury anticipated levels of growth have been exceeded over the first half of the plan period.. Over the same interval, scales of development within rural areas in many places have also exceeded those anticipated by the WCS. The rural area around

Corsham, for instance, has experienced much higher rates of housing development overall by developments such as that south of Bradford Road at Rudloe involving former Ministry of Defence land.

- 5.19 Indicative levels of housing for Market Towns are not a ceiling and variations would not seem to present new or significant issues for local infrastructure and environmental capacity. Allocations made in the Plan are made to support the spatial strategy. It is not however possible for this Plan to completely re-dress imbalances in the distribution of development from what the Core Strategy envisaged. A review of the WCS is the appropriate means to properly consider the performance and long term prospects of settlements.
- 5.20 Chippenham, however, is now likely to exceed the minimum scale of growth anticipated in the WCS by higher rates of house building in the last half of the plan period compared to much lower rates over recent years. This will come about in large part as a result of significant allocations for housing development made in the Chippenham Site Allocations Plan.
- 5.21 Until very recently there has been a shortage of development opportunities at the town. It is difficult to substantiate a direct connection, but this shortage may also have contributed to the higher than anticipated rates of development experienced by Calne, neighbouring Chippenham. Higher rates of development than expected cause concern about the adequacy of local infrastructure to support population growth and about environmental impacts. No allocations are proposed in the Plan for Calne or Corsham.
- 5.22 Symptoms of similar circumstances appear to be apparent with regard to Trowbridge as at Chippenham, although there would not appear to be such a pronounced shortage of land at Trowbridge.
- 5.23 However unlike Chippenham, allocations made by the Plan at Trowbridge will not be sufficient to ensure that housing provision meets indicative requirements. Six new site allocations provide land for approximately 800 dwellings. Nevertheless, housing development at Trowbridge will fall short of the WCS indicative level of 6,810 dwellings by around 1,220.
- 5.24 One reason for a shortfall in land supply is the complexity and consequent delay developing Ashton Park; a south eastern urban extension to the town. 1,600 dwellings will be built on this site in the plan period and around a further 1,000 post 2026; rather than first envisaged that the whole of the allocation would have been completed in the plan period. This can be seen to account for 1,000 of the 1,220 dwelling shortfall.
- 5.25 A second reason for a shortfall has been the inability to identify enough land free from environmental constraints that could compensate for the consequences of delay to Ashton Park. Designated green belt provides long term protection from development and limits the scope for Trowbridge to expand. Ecological constraints result from the need to safeguard habitats for protected bats.
- 5.26 In addition, to meet Plan objectives, land identified should be capable of development within the plan period. Unlike Salisbury, there are no reserve locations or areas of



search. At this stage substituting one complex site by another would not provide a remedy to a relatively short term issue.

- 5.27 Looking over the Plan period there has not been as dramatic a fall off in housing completions at Trowbridge as took place at Chippenham. Average completions to date are around 285 dwellings per annum<sup>21</sup> compared to the forecast rate of 340. Unlike Chippenham where completions have been in double figures for several years, annual house completions have ranged from 130 to 474. The average rate is set to rise over the remainder of the plan period but still not to the level envisaged by the WCS. There are significant brownfield opportunities that are a priority for redevelopment, although this source of housing land is ultimately a modest proportion of overall supply. Ashton Park provides by far the largest part of new housing to serve the town and this area will continue to do so for several more years after 2026. It provides a longer term surety of supply that helps to support the town's long term role. There is not the same urgency to provide for housing development as there was perhaps at Chippenham.
- 5.28 The Plan allocations provide choice and flexibility as well as add to supply. The shortfall compared to an indicative level is not so severe as to jeopardise the position of Trowbridge as a Principal Settlement and undermine objectives of the spatial strategy. The WCS makes clear that indicative requirements for community areas are not prescriptive maxima or minima. A lower provision over the shorter term represents the flexibility associated with the indicative nature of the requirements of the WCS.
- 5.29 Both Westbury and villages around Trowbridge have experienced higher than anticipated rates of growth. The WCS has the objective of consolidating growth at Westbury and this plan makes no additional allocations for housing development.
- 5.30 Allocations at Large Villages in the HMA are made only in those rural areas ('community area remainders') where indicative levels will not be met and where local needs have not been addressed or are not being addressed through neighbourhood planning. As well as being necessary to help ensure a surety of supply, these allocations will help to support the role of those Large Villages, supporting a range of local employment, services and facilities.
- 5.31 The scale of development at Warminster is not envisaged to meet indicative strategic requirements. Two proposals of this Plan improve choice in the Town. Constraints include flood risks and managing phosphate levels that can affect the River Avon Special Area of Conservation. The West Warminster Urban Extension provides by far the largest part of new housing to serve the town and this area will continue to do so for several more years after 2026. It provides a longer term surety of supply that supports the role and function of the town.
- 5.32 Constraints to Trowbridge's longer term growth will be addressed as part of the review of the Core Strategy that will look from 2016 beyond 2026 to 2036. If all other reasonable alternatives have been considered, this might include a review of how Green Belt boundaries around the town may affect the town's longer term prospects.

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<sup>21</sup> 2006-2016

5.33 Differences from the pattern of development envisaged by the WCS have arisen over the first half of the plan period, which is as can be expected over such a large administrative area. Plan allocations go some way to reversing this, but only so far. Specifically, growth at Trowbridge is more constrained and more difficult to realise than had been envisaged, although not so much as to fundamentally undermine the spatial strategy. The Plan proposals for the HMA are in general conformity with the WCS. Housing provision exemplifies the flexibility made necessary by the indicative nature of the community area requirements of the WCS. The Plan is in general conformity with the WCS and adequately enhances surety of land supply.

## South Wiltshire Housing Market Area

### Housing requirement

- 6.1 Information about planning permissions, dwelling completions and current plan allocations in the housing market area over the plan period so far (2006-2017) excluding any allowance for windfall shows that land for a further 594 dwellings would meet the minimum required by WCS Core Policy 2.

Housing Market Area	Housing requirement 2006-2026	Housing completions 2006-2017	Developable commitments 2017-2026	Minimum to be allocated
South Wiltshire	10,420	5,067	4,759	594

Figure 23: South Wiltshire HMA - Housing Requirement

### Summary of Proposals

- 6.2 Plan allocations are focussed on Areas of Search to help ensure the remaining requirement for the HMA can be met. These are Principal Settlements and Market Towns and their rural hinterland, the 'community area remainder.
- 6.3 The South Wiltshire HMA also includes several Local Service Centres (LSC) that have a particular role. Local Service Centres are defined as smaller towns and larger villages which serve a surrounding rural hinterland and possess a level of facilities and services that together with improved local employment, provide the best opportunities outside the Market Towns for greater self containment
- 6.4 Plan allocations also supplement supply in order to meet the indicative levels of development suggested by the spatial strategy of the WCS and fulfil the strategic role of settlements defined in the Area Strategies<sup>22</sup> and Core Policy 1 of the WCS.
- 6.5 Areas of search in the South Wiltshire HMA are

Areas of Search	
Amesbury, Durrington and Bulford	Market Town
Salisbury	Principal Settlement

Figure 24: South Wiltshire HMA - Areas of Search

- 6.6 Informed by recommendations of sustainability appraisal and the input of specialist stakeholders site options were selected and developed further to create the following set of plan allocations at settlements within areas of search:

<sup>22</sup> See Wiltshire Core Strategy Core Policies 4, 17, 20, 23, 27 and 33.



Settlement	Site Name	Approximate dwellings
Durrington	Piece Meadow	15
	Land to rear of Durrington Manor	15
	Land off Larkhill Road	15
Salisbury	Land at Netherhampton Road	640
	Land at Hilltop Way	10
	North of Netherhampton Road	100
	Rowbarrow	100

Figure 25: South Wiltshire HMA - Plan allocations

6.7 In terms of the scale of housing development, Salisbury, as a Principal Settlement, is the main focus for allocations in this Plan realised by bringing forward land in the area of search identified as a contingency for development in the WCS. Sites in Durrington make up the remainder. No sites are allocated at Large Villages in the HMA because of a lack of suitable and available site options. Proposals for housing development at Local Service Centre and Large Villages are contained in emerging and made Neighbourhood Plans.

### Housing Land Supply

6.8 Excluding an allowance for windfall, anticipated land supply in the South Wiltshire HMA compared to strategic requirements, in terms of numbers of dwellings, is as follows:

HMA	Housing requirement 2006-2026	Housing completions 2006-2017	Commitments 2017-2026	Plan allocations 2017-2026	TOTAL	Surplus
South Wiltshire	10,420	5,067	4,759	795 <sup>23</sup>	10,621	201

Figure 26: South Wiltshire HMA - Housing provision

6.9 The scale of housing meets requirements for the HMA for the plan period. At the baseline date of 2017 the supply of deliverable land (land capable of being built in the next five years) for housing development is well in excess of the minimum requirement of five years with an additional 5% buffer and achieves a target of six years supply.

Area	Housing requirement 2006-2026	Housing completions 2006-2017	Five year housing requirement 2017-2022	Deliverable supply 2017-2022	Number of years of deliverable supply
South Wiltshire	10,420	5,067	2,974	3,621	6.09

Figure 27: South Wiltshire - Five year land supply 2017

6.10 Estimates show that housing land supply in excess of six years can be achieved each year until the last two years of the plan period.

Year supply	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
South HMA	6.09	6.30	6.43	6.65	6.88	7.13	6.70	5.87	4.75

Figure 28: South Wiltshire - Five year land supply 2017 – 2026

<sup>23</sup> 100 dwellings at Netherhampton Road are expected to be built 2026/27 outside the plan period.

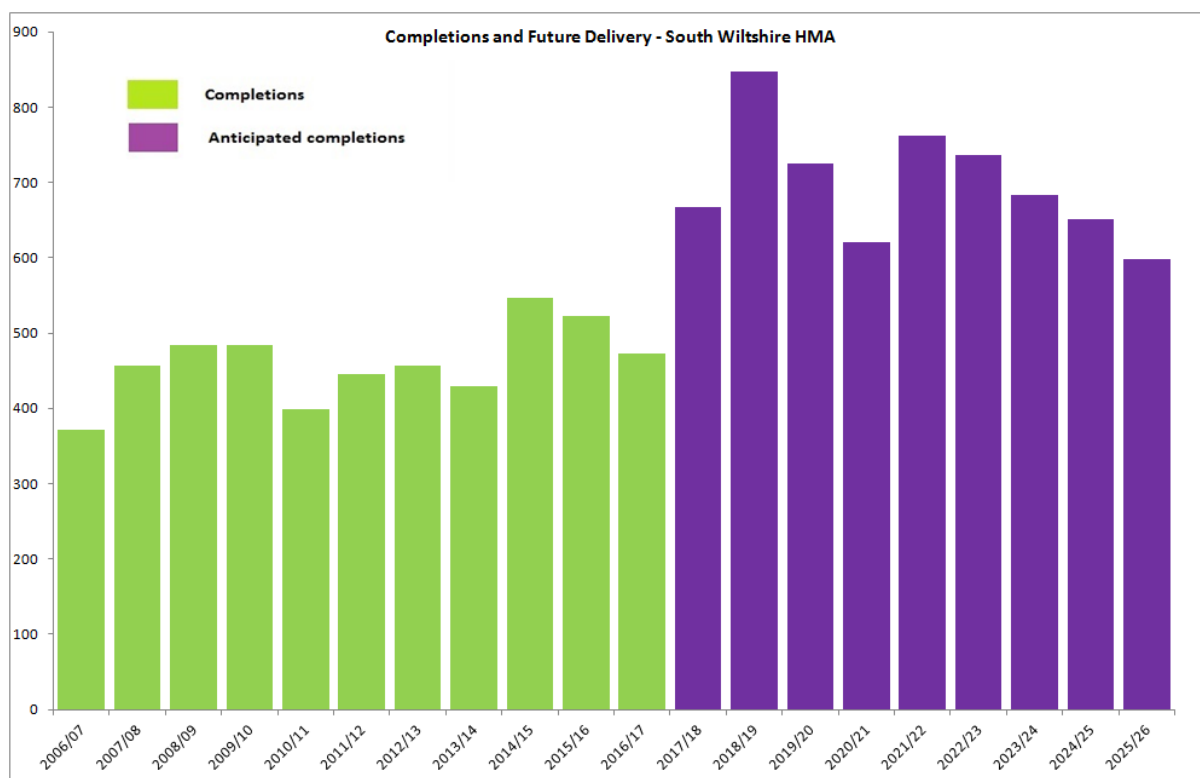


Figure 29: Completions and Future Delivery - South Wiltshire HMA

*Resilience testing*

Test	Result
Site delay	<p>WCS Strategic Sites at Fugglestone Red and Longhedge are currently the main components of supply in the area and being implemented.</p> <p>The supply from these sites is envisaged to be augmented by three other large sites each of more than 500 dwellings<sup>24</sup>. These three sites would make up approximately a little under a half of all planned supply over the remainder of the plan period. Resilience testing has used a pessimistic scenario that two of these sites do not commence<sup>25</sup>.</p> <p>At face value the Council would not be able to demonstrate a five year supply and 5% buffer of deliverable land for housing from 2019/20. This is because the delayed sites in this scenario are being expected to contribute toward supply in years four and five of the current forecast and therefore they have an immediate effect on estimates.</p>

<sup>24</sup> Churchfields and Netherhampton Road, Salisbury and King's Gate, Amesbury

<sup>25</sup> Resilience testing assumed no development on sites at Churchfields and Netherhampton Road, Salisbury (approximately 1300 dwellings).

	<p>The Netherhampton Road site is positioned to supplement supply in the last three quarters of the plan period. With a four year lead in there is still a good intervening period of time to resolve any unforeseen obstacles to development. A four year lead in also potentially allows time to consider additional sites to be allocated through the review of the WCS. Such a delay with two sites so central to the wider strategy for the City would, in any event, require such a more fundamental review.</p> <p>A high proportion of supply in the next five years is secure because of other large strategic sites currently or imminently under construction. This is a strong counter balance to any residual risks to the remainder of the supply. The impact of even the highly significant site delay envisaged in the tested scenario can still be mitigated in the unlikely event that two main Strategic Sites fall completely out of the anticipated supply.</p>
<p>Reliance on windfall</p>	<p>Figure 26 shows that meeting minimum HMA housing requirements does not rely on housing contributed from windfall.</p> <p>The margin shows that minimum requirements for the HMA will be provided over the plan period.</p>
<p>Persistent under-delivery</p>	<p>Completions over the plan period have averaged over 89% of the annualised housing strategic requirement. WCS strategic sites commenced toward the latter end of this period and are a significant supplement to land supply. They made little significant contribution in the first half of the plan period.</p> <p>The average of the last five years' completions is 480 dwellings per annum and exceeds the average rate of 461 over the plan period so far.</p> <p>The estimated annual rate of completions for the remainder of the Plan period is set to average around 600 dwellings per annum.</p> <p>There was some under delivery at the beginning of the plan period (before the WCS housing requirements were set), but completions have shown a rising trend since. This is an improvement on the position in 2014 when the WCS Inspector considered housing land supply and concluded that there was not a record of persistent under-delivery. Given that circumstances have improved, there has still not been persistent under delivery.</p> <p>Nonetheless, deliverable land supply provides a</p>



	buffer in excess of 20% until the final year of the plan period when additional land for housing development will have been allocated through review of the WCS .
A backlog of development	<p>There is no serious backlog of housing development accruing over the plan period.</p> <p>Applying the alternative Sedgefield approach has a limited impact on the next two years' estimates of land supply. Land supply would still be met in both these years with a 5% buffer.</p>

*Whether to allocate sites at Large Villages?*

6.11 The site selection process has not identified any new allocations for housing development at Large Villages. Local needs for housing will be addressed by several neighbourhood plans. This is explained below.

*What housing sites are important to ensuring a surety of supply?*

6.12 The South Wiltshire HMA has a slightly less generous housing land supply than elsewhere in Wiltshire.

6.13 Salisbury is the Principal Settlement within the HMA. It is intended to be the primary focus for development, providing significant levels of jobs and homes. Two site allocations of more than 500 dwellings are important to ensuring there is a surety of supply to the end of the period and that the City achieves the role set out in the spatial strategy. Churchfields and land at Netherhampton Road (Salisbury). The first is a strategic site allocated in the WCS. The latter of these, at Netherhampton Road, is an allocation of this Plan.

4.64 It is unlikely that all the strategic sites allocated in the WCS for Salisbury would deliver sufficiently within the plan period to meet housing requirements and ensure supply, and therefore land allocated at Netherhampton Road is necessary. A shortage of land could impede the City's prospects and it could also lead to greater development pressures in other settlements in the HMA less suited to growth.

6.14 Churchfields strategic mixed-use site that Core Policy 20 of the WCS requires to deliver 1100 dwellings by 2026. To be developed, this site requires substantial employment decant and is now expected to deliver much less within the plan period. It is a complex regeneration project that will take time to deliver and will require other sites to enable some of the existing businesses to relocate.

6.15 The site at Netherhampton Road has the ability to address the lack of housing delivery at Churchfields and also the potential to provide employment land for Churchfields businesses to relocate to, thereby freeing up land at Churchfields for housing delivery in the longer term. The WCS identifies the site at Salisbury as a reserve site to bring forward if, as is occurring, the redevelopment of Churchfields was taking longer than anticipated. The Plan therefore implements this contingency in order to ensure a sufficient supply of housing. The allocation of Netherhampton Road, a substantial site,

will not therefore lead to an increase in the overall scale of housing growth at Salisbury within the Plan period.

- 6.16 Recognising the scale of the site, a generous lead in time is provided for the delivery of Netherhampton Road. The site is not intended to contribute to housing delivery for several years whilst work is carried out to master plan the site and develop mitigation measures. In the meantime, supply from major schemes such as Fugglestone Red and Longehedge will ensure sufficient supply. Further sites at Salisbury support provision for primary education in the south of the City. They improve choice. They also help to safeguard land supply should there be unforeseen and serious delay with the delivery of any other sites.
- 6.17 Resilience testing shows the importance of both Churchfields and Netherhampton Road sites and the need for further land to be allocated for housing development by around 2022/23 should the development of either one of these sites be significantly delayed.
- 6.18 Further sites at Salisbury support provision for primary education in the south of the City. They improve choice. They also help to safeguard land supply should there be unforeseen and serious delay with the delivery of any other sites.

### **Spatial Strategy**

- 4.21 The table below compares indicative requirements with proposed levels of growth in each area including the proposed allocations and this is followed by a consideration of where there are variations from the intended distribution indicated in the spatial strategy of the WCS. The Plan must be in general conformity with the WCS.

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	TOTAL	% Variation
<b>Urban areas</b>					
Amesbury, Bulford and Durrington	2440	1,311	1,101	2412	-1%
Salisbury	6,060	2,273	3,833	6,637	10%
Wilton		323	208		
<b>TOTAL</b>	<b>8700</b>	3,907	5,142	9,049	6%
<b>Rural areas</b>					
Amesbury CA remainder	345	179	58	237	-31%
Mere CA remainder	50	37	5	42	-15%
Mere (LSC)	235	126	139	265	13%
Downton (LSC)	190	88	105	193	2%
Tisbury (LSC)	200	170	5	175	-12%
Wilton CA remainder	255	115	11	126	-51%
Southern Wiltshire CA remainder	425	385	78	463	9%
Tisbury CA remainder	220	60	11	71	-68%
<b>TOTAL</b>	<b>1,920</b>	1,160	412	1,572	-18%

Figure 30: South Wiltshire HMA - Fit with spatial strategy

- 6.19 Overall, the scale of development at urban areas matches the intention of the strategy in terms of how much growth is focussed on the main settlements. There are minor differences between indicative and proposed levels that are not significant.
- 6.20 Provision for the rural areas of the HMA can be divided between growth at Local Service Centres and elsewhere, including Large Villages.
- 6.21 Local Service Centres (LSCs) are defined as smaller towns and larger villages which serve a surrounding rural hinterland and possess a level of facilities and services that together with improved local employment, provide the best opportunities outside the Market Towns for greater self containment. The spatial strategy of the WCS sets levels for housing development over the plan period for each LSC. Levels of housing development envisaged at Mere and Downton fit with that strategy. The level of development proposed for Tisbury is lower. There is a significant brownfield site option under consideration through the neighbourhood planning process that takes priority over consideration of greenfield alternatives. This would meet indicative requirements at the settlement.
- 6.22 In terms of the wider rural area, overall, given the flexibility that should be associated with indicative requirements there is no fundamental conflict with spatial strategy and proposals are in general conformity with the WCS. There are three Large Villages in the rural area around Tisbury, where provision is currently much lower than expected by the WCS. All three villages are within the Cranborne Chase and West Wiltshire Downs AONB and this Plan does not propose any allocations because of a variety of constraints and a lack of land availability. In the rural area around Wilton, of the two Large Villages, Dinton has already experienced relatively significant growth and at



Broad Chalke sites are being investigated through the preparation of a Neighbourhood Plan, although the local primary school has limited capacity to support growth. Neighbourhood planning is suited to addressing local needs in these circumstances. The Plan is in general conformity with the WCS and adequately enhances surety of land supply.





## **Wiltshire Housing Site Allocations Development Plan Document (DPD) - Assessment of Viability**

Prepared for  
Wiltshire Council

May 2017



## Contents

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# 1 Introduction

- 1.1.1 This report tests the ability of a range of development typologies identified by Wiltshire Council to be viably developed over the 2015 Wiltshire Core Strategy (WCS) plan period which runs to 2026 for the purpose of supporting the Wiltshire Housing Site Allocations plan.
- 1.1.2 The study takes account of the cumulative impact of the Council's current planning requirements, in line with the requirements of the National Planning Policy Framework ('NPPF') and the Local Housing Delivery Group guidance '*Viability Testing Local Plans: Advice for planning practitioners*'. While the study takes account of all plan policies and Community Infrastructure Levy, it focuses on the Council's requirements for affordable housing and tests 40% affordable housing which is the higher rate of affordable housing set out in Core Policy 43 of the Wiltshire Core Strategy.
- 1.1.3 Recent forecasts for future house price growth predict a continued increase over a 5 year period from 2017 in the south west housing markets albeit at reduced level to forecasts prior to the EU Referendum. Consequently, there is a degree of market uncertainty following the result of the referendum and the UK's impending withdrawal from the EU. However, as the WCS covers a period which runs to 2026, we have undertaken a sensitivity analysis to determine the potential viability outcomes of development typologies when sales values and construction costs are increased; and when sales values are reduced.
- 1.1.4 This analysis is indicative only, but is intended to assist the Council in understanding the broad viability of its proposed housing site allocations in terms of their ability to accommodate typical development costs and local plan policy requirements (e.g. affordable housing expectations). This assessment is therefore proportionate and presented on a high level and current day basis.
- 1.1.5 The main section of this report constitutes a study of a range development typologies, Our assessment makes overall judgements with regards to the viability of each typology and does not account for more detailed site specific attributes that may impact upon development viability. Due to the extent and range of financial variables involved in residual valuations, they can only ever serve as a guide. This is recognised within Section 2 of the Local Housing Delivery Group<sup>1</sup> guidance, which identifies the purpose and role of viability assessments within plan-making. The Guidance notes:
- "The role of the test is not to give a precise answer as to the viability of every development likely to take place during the plan period. No assessment could realistically provide this level of detail. Some site specific tests are still likely to be required at the development management stage. Rather, it is to provide high level assurance that the policies within the plan are set in a way that is compatible with the likely economic viability of development needed to deliver the plan".*
- 1.1.6 This Council's proposed allocations range in size and complexity. Therefore, in order to provide additional support to the Plan, detailed testing has been undertaken on one large site that has a particular infrastructure requirement specified in the proposed policies. This site is Netherhampton Road in Salisbury.

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<sup>1</sup> 'Viability Testing Local Plans: Advice for planning practitioners' August 2012. This group was led by the Homes and Communities Agency and comprises representatives from the National Home Builders Federation, the Royal Town Planning Institute, Local Authorities and valuers (including BNP Paribas Real Estate)

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## Key Findings

The key findings of the study are as follows:

- The results of this study are reflective of current market conditions, which may inevitably change over the medium term. It is therefore important that the Council keeps the viability situation under review so that policy requirements can be adjusted should conditions change markedly. We have modelled a sensitivity analysis on each of the development typologies with increases/reductions to market housing values and construction costs in order to demonstrate viability on schemes in differing market conditions.
- The typologies we have modelled across the HMAs can accommodate the Council's affordable housing requirement of 40% affordable housing with a policy compliant tenure mix of 70% affordable rented and 30% shared ownership units. It is important to stress that the typology appraisal results are based upon a specific unit mix and generic assumptions and as a result an alternative scheme may render different results.
- In summary, our development typology appraisals indicate that 40% affordable housing is supportable, however, there will inevitably be a degree of negotiation when site specific schemes come forward through the planning process due to scheme-specific factors that cannot be determined in a high level assessment of generic development typologies. This issue is, however, adequately addressed through planning policy measures that are in place that recognise that the actual amounts of affordable housing delivered on individual schemes may vary when scheme-specific viability issues emerge.
- Our assessment of Netherhampton Road which has been identified by the Council as a strategic site demonstrates that this site can support 40% affordable housing in addition to infrastructure requirements comprising payments towards education and road infrastructure.



## 2 Methodology

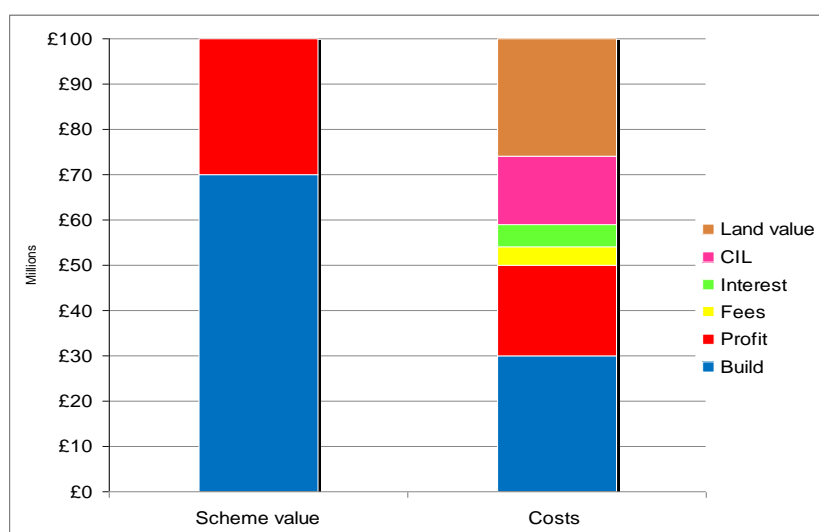
2.1.1 Our methodology follows standard development appraisal conventions, using development typologies and assumptions that reflect local market and planning policy circumstances. The study is therefore specific to Wiltshire Council and reflects the Council's existing and planning policy requirements.

### Approach to testing development viability

2.1.2 The study methodology compares the residual land values generated by a series of development typologies that are reflective of the types of development expected to come forward over the plan period to a range of 'benchmark land values'. The typology approach has been found by examiners to be sound in a significant number of studies and examples include over 50 CIL viability studies we have undertaken in addition to Wiltshire Council CIL, London Borough of Hounslow Local Plan, Welwyn Hatfield Local Plan and Brighton and Hove City Council Local Plan.

2.1.3 In summary, if a development incorporating the Council's policy requirements generates a higher residual land value than the benchmark land value, then it can be judged that the site is viable and deliverable. Following the adoption of policies, developers will need to reflect policy requirements in their bids for sites, in line with requirements set out in the RICS Guidance on 'Financial Viability in Planning'<sup>2</sup>.

2.1.4 The study utilises the residual land value method of calculating the value of each development. This method is used by developers when determining how much to bid for land and involves calculating the value of the completed scheme and deducting development costs (construction, fees, finance, sustainability requirements and CIL) and developer's profit. The residual amount is the sum left after these costs have been deducted from the value of the development, and guides a developer in determining an appropriate offer price for the site. Appraisal models can be summarised via the following diagram. The total scheme value is calculated, as represented by the left hand bar. This includes the sales receipts from the private housing and the payment from a Registered Provider ('RP') for the completed affordable housing units. The model then deducts the build costs, fees, interest, CIL (at varying levels) and developer's profit. A 'residual' amount is left after all these costs are deducted – this is the land value that the Developer would pay to the landowner. The residual land value is represented by the brown portion of the right hand bar in the diagram.



<sup>2</sup> This guidance notes that when considering site-specific viability "Site Value should equate to the market value subject to the following assumption: that the value has regard to development plan policies and all other material planning considerations and disregards that which is contrary to the development plan". Providing therefore that Site Value does not fall below a site's existing use value, there should be no reason why policy requirements cannot be achieved.

- 2.1.5 The Residual Land Value is normally a key variable in determining whether a scheme will proceed. If a proposal generates sufficient positive land value (in excess of current use value), it will be implemented. If not, the proposal will not go ahead, unless there are alternative funding sources to bridge the 'gap'.
- 2.1.6 Ultimately, the landowner will make a decision on implementing a project on the basis of return and the potential for market change, and whether alternative developments might yield a higher value. The landowner's 'bottom line' will be achieving a residual land value that sufficiently exceeds 'existing use value' or another appropriate benchmark to make development worthwhile. The margin above current use value may be considerably different on individual sites due to particular reasons why the premium to the landowner should be higher or lower than other sites.
- 2.1.7 Clearly, however, landowners have expectations of the value of their land which will often exceed the value of the sites' current use. Ultimately, if landowners' expectations are not met, they will not voluntarily sell their land and (unless a Local Authority is prepared to use its compulsory purchase powers) some may simply hold on to their sites, in the hope that policy may change at some future point with reduced requirements. It is within the scope of those expectations that developers have to formulate their offers for sites. The task of formulating an offer for a site is complicated further still during buoyant land markets, where developers have to compete with other developers to secure a site, often speculating on increases in development value or with the expectation of value engineering costs.

#### **Viability Benchmark**

- 2.1.8 The NPPF does not prescribe any particular methodology for assessing the viability of developments in their areas for testing local plan policies. The Local Housing Delivery Group guidance (June 2012) on testing viability of local plan policies notes that *"consideration of an appropriate Threshold Land Value [or viability benchmark] needs to take account of the fact that future plan policy requirements will have an impact on land values and landowner expectations. Therefore, using a market value approach as the starting point carries the risk of building-in assumptions of current policy costs rather than helping to inform the potential for future policy"*. The RICS Guidance Note 'Viability in Planning' (August 2012) which advocates market value as a benchmark for testing viability, is therefore not applicable to a test of planning policy.
- 2.1.9 In light of the weaknesses in the market value approach, the Local Housing Delivery Group guidance recommends that benchmark land value *"is based on a premium over current use values"* with the *"precise figure that should be used as an appropriate premium above current use value [being] determined locally"*. The guidance considers that this approach "is in line with reference in the NPPF to take account of a "competitive return" to a willing land owner".
- 2.1.10 The examination on the Mayor of London's CIL charging schedule considered the issue of an appropriate land value benchmark. The Mayor had adopted current use value, while certain objectors suggested that 'Market Value' was a more appropriate benchmark. The Examiner concluded that:
- "The market value approach....while offering certainty on the price paid for a development site, suffers from being based on prices agreed in an historic policy context." (para 8) and that "I don't believe that the EUV approach can be accurately described as fundamentally flawed or that this examination should be adjourned to allow work based on the market approach to be done" (para 9).*

In his concluding remark, the Examiner points out that:

*"the price paid for development land may be reduced [so that CIL may be accommodated. As with profit levels there may be cries that this is unrealistic, but a reduction in development land value is an inherent part of the CIL concept. It may be argued that such a reduction may be all very well in the medium to long term but it is impossible in the short term because of*

*the price already paid/agreed for development land. The difficulty with that argument is that if accepted the prospect of raising funds for infrastructure would be forever receding into the future. In any event in some instances it may be possible for contracts and options to be re-negotiated in the light of the changed circumstances arising from the imposition of CIL charges". (para 32 – emphasis added).*

2.1.11

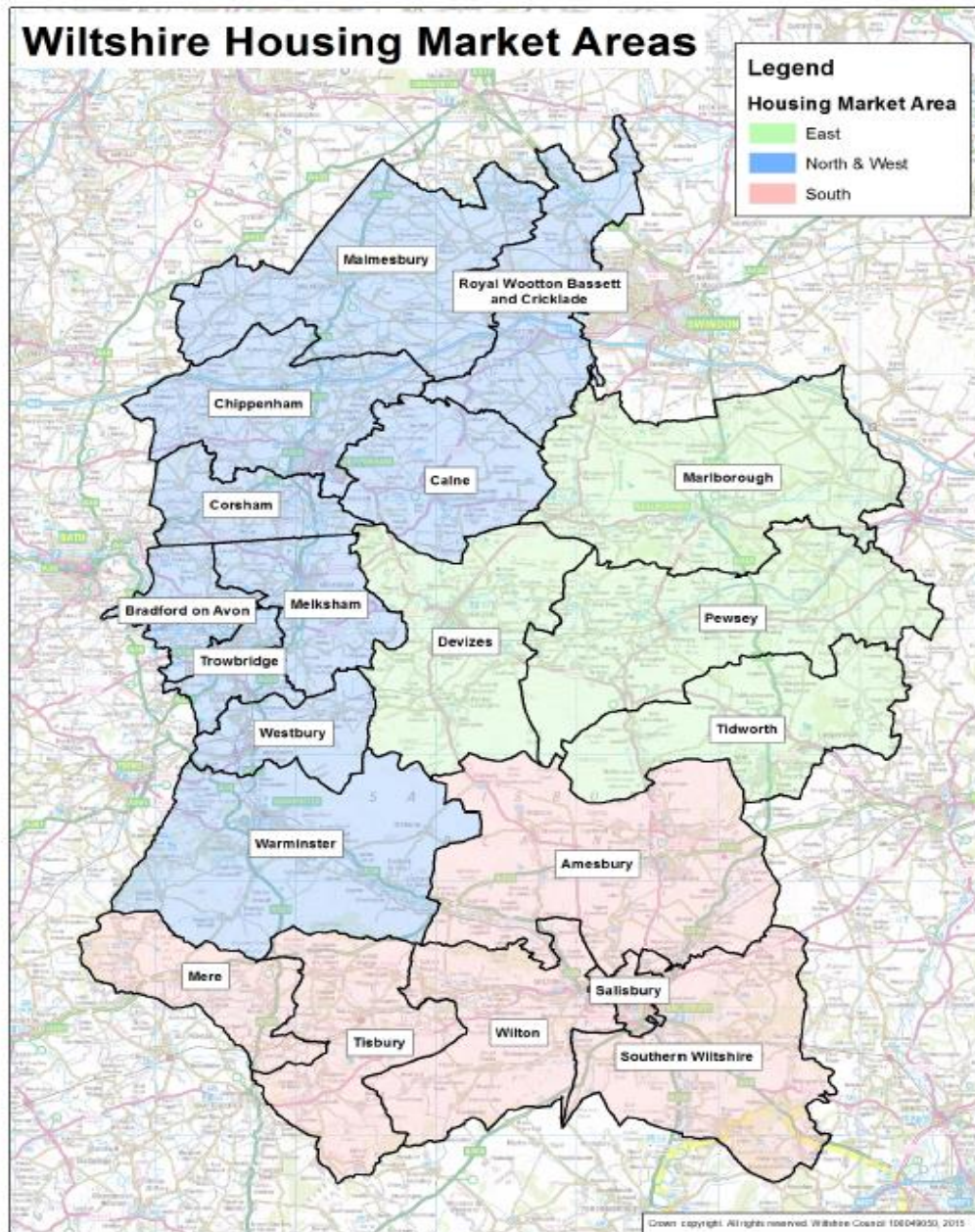
It is important to stress, however, that there is no single threshold land value at which land will come forward for development. The decision to bring land forward will depend on the type of owner and, in particular, whether the owner occupies the site or holds it as an asset; the strength of demand for the site's current use in comparison to others; how offers received compare to the owner's perception of the value of the site, which in turn may be influenced by prices achieved by other sites. Given the lack of a single threshold land value, it is difficult for policy makers to determine the minimum land value that sites should achieve. This will ultimately be a matter of judgement for each individual Planning Authority.

## 3 Development Appraisals

Our assumptions adopted for the development appraisals are set out in the following section.

### 3.1 Housing Market Areas

3.1.1 We have been provided with details of the housing market areas (HMAs) that form the basis of this study and comprise East HMA, North and West HMA and South HMA. We set out below a map which highlights the HMAs in the context of Wiltshire.



Source: Wiltshire Housing Site Allocations Development Plan Document Informal consultation on initial site options - Housing supply paper February 2015



## 3.2 Development Typologies

- 3.2.1 A range of development typologies have been formulated in discussions with the Council. These development typologies have been established through an analysis of built or extant planning permissions across each Housing Market Area (HMA). The analysis covers the period 2009/10 to 2015/16. These time frames were chosen by the Council as earlier time periods (2006/07 and 2008/09) only recorded dwellings, not flats and/or houses and would have compromised the determination of a unit mix. Therefore, in determining 'typical' development typologies across all three HMAs, the Council used a cluster analysis approach using ESRI ArcGIS mapping tools and the natural breaks (Jenks) optimisation method. In undertaking this level of analysis on past/current build out patterns across Wiltshire's three HMAs, the Council have been able to demonstrate that housing developments typically fall into four site size classes. The characteristics of these development typologies are summarised in Tables 3.2.1, 3.2.2 and 3.2.3.

**Table 3.2.1: East HMA Development Typologies**

Site Size Class (number of units)	Typology Tested (number of units)	Typology Size (hectares)	Density (units per hectare)
Class 1: 1 – 18	10	0.64	15
Class 2: 19 – 51	35	1.24	28
Class 3: 52 – 138	95	2.58	37
Class 4: 139 +	225	6.75	33

**Table 3.2.2: North & West HMA Development Typologies**

Site Size Class (number of units)	Typology Tested (number of units)	Typology Size (hectares)	Density (units per hectare)
Class 1: 0 – 25	13	0.53	25
Class 2: 26 – 70	48	1.60	30
Class 3: 71 – 129	100	3.02	33
Class 4: 130 +	276	9.41	29

**Table 3.2.3: South HMA Development Typologies**

Site Size Class (number of units)	Typology Tested (number of units)	Typology Size (hectares)	Density (units per hectare)
Class 1: 1 – 25	13	0.40	32
Class 2: 26 – 100	63	1.77	35
Class 3: 101 – 170	136	4.28	32
Class 4: 171 +	336	10.08	33

## 3.3 HMA Unit mixes

- 3.3.1 The Council has provided us with indicative unit mixes which we have applied to each of the typologies tabulated above based upon completed and commenced planning permissions from 2009 to 2015 in the HMAs. We tabulate in the tables below the unit mixes adopted for each HMA and the postcodes that falls within these HMAs. For the purpose of this assessment we have assumed that the typologies of less than 15 units will comprise of houses.

**Table 3.3.1: East HMA Unit mixes**

Site Size Class	Typology Tested (number of units)	Unit Mix (% Flats)	Unit Mix (% Houses)
Class 1: 1 – 18	10	-	100%
Class 2: 19 – 51	35	-	100%
Class 3: 52 – 138	95	26%	74%
Class 4: 139 +	225	12%	88%

**Table 3.3.2: North and West HMA Unit mixes**

Site Capacity (units)	Typology Tested (number of units)	Unit Mix (% Flats)	Unit Mix (% Houses)
Class 1: 0 – 19	13	-	100%
Class 2: 20 – 62	48	27%	73%
Class 3: 63 – 129	100	20%	80%
Class 4: 130 +	276	29%	71%

**Table 3.3.3: South HMA Unit mixes**

Site Capacity (units)	Typology Tested (number of units)	Unit Mix (% Flats)	Unit Mix (% Houses)
Class 1: 0 – 31	13	-	100%
Class 2: 32 – 100	63	21%	79%
Class 3: 101 – 170	136	10%	90%
Class 4: 171 +	336	15%	85%

### 3.4 Unit Sizes

3.4.1 We have adopted the unit sizes tabulated in Table 3.4.1 having regard to the DCLG's national space standards<sup>3</sup>.

**Table 3.4.1: Average Unit Sizes**

Unit Type	Average Floor Area (sq/m)
Detached House	120
Semi-Detached House	100
Terraced House	80
Flat	60

<sup>3</sup> Department for Communities and Local Government 'Technical Housing Standards – Nationally described space standard' March 2015

### 3.5 Project Programme

- 3.5.1 We have assumed that market housing sales rates would correlate with the anticipated build out rates over the course of the construction programme with a post practical completion sales period for each typology. However, for the typologies under 15 units we have assumed that the unit sales will commence from practical completion.
- 3.5.2 Development sales periods vary between the types of scheme being delivered. However, our sales periods are based upon an average sales rate of 4 per month. However, we have assumed that the larger typologies in excess of 171 units will have more than one sales and marketing outlet each targeting different markets which would increase the sales rate to 8 per month. In terms of the affordable housing units, we have assumed the developers will seek contracts with RPs for the disposal of the affordable housing prior to commencement of construction. The disposal price for the affordable housing is assumed to be received in tranches across the construction programme.

### 3.6 Market Housing Sales Values

- 3.6.1 In arriving at sales values for the market housing units, we have had regard to sale prices from the Land Registry database and we have extracted sold price data for both new build and second hand sales within the HMAs over the past twelve months. The Land Registry has recorded 649 new build sales and 6,563 second hand sales over the last twelve months across the HMAs combined. We have analysed and allocated these sale transactions into the corresponding HMA.
- 3.6.2 Whilst we have had regard to sales transactions, data on unit floor areas is not available. As a result, we have therefore adopted average net internal unit areas of 120 square metres for detached houses; 100 square metres for semi-detached houses; 80 square metres for terraced houses; and 60 square metres for flats as set out in Table 3.4.1. By dividing the prices paid by these average floor areas, it is possible to arrive at indicative values for each HMA, but it is important to recognise that average values per square metre may vary if unit sizes are significantly different from our assumed unit areas.
- 3.6.3 We tabulate below in Table 3.6.3 the average capital values per sq/m from our analysis of for new build properties derived from our analysis within each HMA. We also tabulate in Table 3.6.4 the average capital values per sq/m from our analysis of sales of second hand properties in each HMA.

**Table 3.6.3: New Build Average Sales Values in each HMA**

HMA	Average Sales Value for Houses (£ per sq/m)	Average Sales Value for Flats (£ per sq/m)
East	£3,633	£3,262
North & West	£2,815	£2,321
South	£3,205	£3,115

**Table 3.6.4 Second-hand Average Sales Values in each HMA**

HMA	Average Sales Value for Houses (£ per sq/m)	Average Sales Value for Flats (£ per sq/m)
East	£2,828	£2,428
North & West	£2,536	£2,132
South	£3,022	£2,894

3.6.4 We have had regard to the new build and second-hand sales tabulated above and highlight that c. 70% of the new build sales transactions we have considered have transacted in 2015. As a result, there will be a significant number of transactions that will not have benefited from capital value growth in value from 2015 to 2017.

3.6.5 We have therefore had regard to the Land Registry House Price index which shows that sales values increased across the Wiltshire by c. 9.5% from July 2015 to August 2016 (the date of our review of evidence). As c. 79% of the sales transactions we have had regard to occurred in 2015 we have added a conservative increase of 5% to the new build sales values tabulated in Table 3.6.3. We tabulate in Table 3.6.5 the sales values per sq/m that we have adopted for each HMA.

**Table 3.6.5: HMA Adopted Sales Values**

HMA	House Capital Value (£ per sq/m)	Flat Capital Value (£ per sq/m)
East	£3,815	£3,425
North & West	£2,956	£2,437
South	£3,365	£3,271

3.6.6 For the affordable rented units we have valued the units on the basis that rents will be capped at Local Housing Allowance (LHA) rates. In the 2015 Budget, the Chancellor announced that the government will require RPs to reduce their rents by 1% per annum over the next four years. Our model reflects this requirement which results in the reduction in capital value of the affordable rented units.

3.6.7 For shared ownership units, we have assumed that RPs will sell 30% initial equity stakes so that units are affordable to households on moderate incomes and charge a rent of 2.5% on the retained equity, the latter being slightly lower than the maximum charge permitted by the Homes and Communities Agency (2.75%). We have capitalised the rent using a yield of 5%.

### 3.7 Construction Costs

3.7.1 We have sourced construction costs for the residential units from the RICS Build Cost Information Services ('BCIS'), which is based upon tenders for actual schemes. We have adopted a 'mean' gross base build cost rebased to Wiltshire of £1,095 per sq/m for houses and £1,307 for flats.

3.7.2 In addition to the base construction costs, we have included an allowance of £16,000 per dwelling to reflect external works and roads and utilities. This allowance accounts for any additional costs that may be incurred due to the physical nature of the sites plus any works required for landscaping, security enhancement and driveways/parking within the site.

3.7.3 We have adopted this cost due to recent evidence and the Wokingham Borough CIL examination where the Inspector agreed with evidence submitted that indicated that an allowance of £16,000 per unit was sufficient. In our experience it is likely that developers will be able to value engineer build costs to lower levels than assumed in this study on larger sites, such as the subject strategic sites.



### 3.8 Professional Fees

- 3.8.1 In addition to the base construction costs, development schemes will incur professional fees, covering consultants such as architects, quantity surveyors, mechanical and electrical engineers and Highways consultants.
- 3.8.2 Our appraisals incorporate an allowance of 8% for professional fees which covers all professional input and planning fees, energy performance certificates and NHBC warranty costs. We have adopted 8% as strategic sites are Greenfield sites and should incur lower professional fees in comparison to brownfield sites. In particular, volume house builders will typically adopt standard house types which will significantly reduce design fees in addition to retaining in-house consultants which can reduce fees.

### 3.9 Finance Costs

- 3.9.1 Our appraisals incorporate finance costs on land acquisition and all construction costs at 7%.

### 3.10 Planning Obligations & CIL

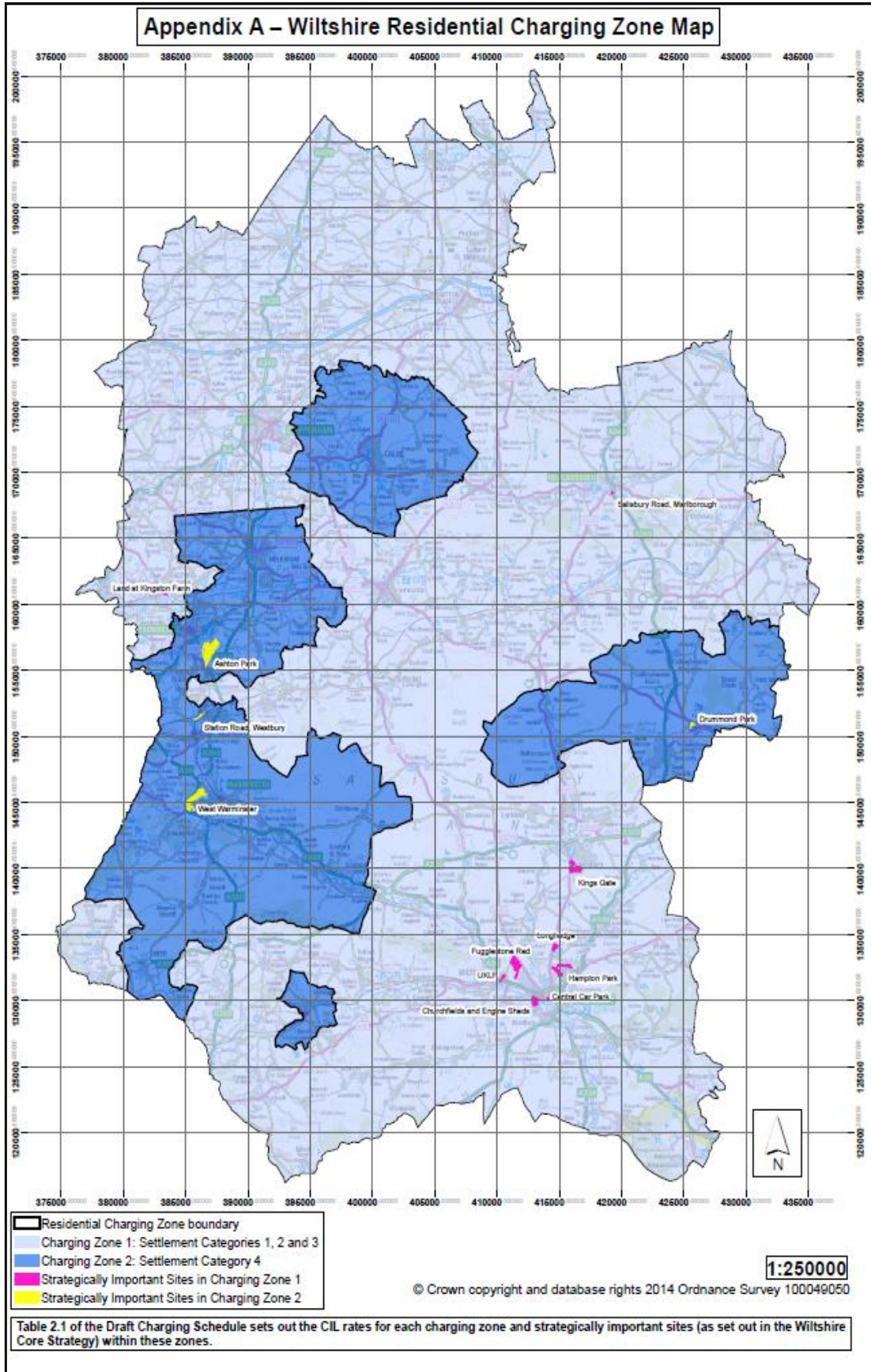
- 3.10.1 We have adopted planning obligations as provided by the Council for each typology and we set these out in Table 3.10.1. We comment in further detail below with regards to the CIL rates we have tested.

**Table 3.10.1: Planning Obligations and CIL**

Planning Obligation	Cost (£ / %)
Affordable Housing	30% for sites with a CIL rate of £55 per sq/m 40% for sites with a CIL rate of £85 per sq/m
S106	£1,000 per unit
Wiltshire CIL	£55 per sq/m & £85 per sq/m

In terms of the S106 obligations we have assumed a notional cost of £1,000 per dwelling for all site typologies. However, the detail in respect of each and every planning obligation will ultimately be determined by the particular requirements of individual sites.

In terms of CIL, the Wiltshire CIL Charging Schedule splits Wiltshire geographically into two CIL charging zones (1 and 2) set out on page 14.



Source: Wiltshire Community Infrastructure Levy 'Charging Schedule' May 2015

### 3.11 Profit

- 3.11.1 Developer's profit is closely correlated with the perceived risk of residential development. The greater the risk, the greater the required profit level, which helps to mitigate against the risk, but also to ensure that the potential rewards are sufficiently attractive for a bank and other equity providers to fund a scheme. In 2007, profit levels were at around 15 -17% of development value. However, following the impact of the credit crunch and the collapse in interbank lending and the various government bailouts of the banking sector, profit margins have increased. It is important to emphasise that the level of minimum profit is not necessarily determined by developers (although they will have their own view and the boards of the major house builders will set targets for minimum profit).
- 3.11.2 The views of the banks which fund development are more important; if the banks decline an application by a developer to borrow to fund a development, it is very unlikely to proceed, as developers rarely carry sufficient cash to fund it themselves. Consequently, future movements in profit levels will largely be determined by the attitudes of the banks towards development proposals. The near collapse of the global banking system in the final quarter of 2008 has resulted in a much tighter regulatory system, with UK banks having to take a much more cautious approach to all lending. In this context, and against the backdrop of the current sovereign debt crisis in the Eurozone, the banks may not allow profit levels to decrease much lower than their current level of 17 -20% even for well-established volume house builders with a solid track record and long standing relationships with funding institutions.
- 3.11.3 We have adopted a profit rate of 20% on GDV for the market housing units to reflect the level of risk that we consider to be present in the current market. We recently experienced a range of 17% to 20% on GDV for market housing units. However, due to the uncertainty that is now apparent after the EU Referendum in the United Kingdom and potential risks associated with leaving the European Union, we consider a profit allowance of 20% on GDV to be reflective of the current market.
- 3.11.4 We have adopted a profit of 6% on GDV for the affordable housing element of the scheme. This reduced profit for the affordable housing reflects the risk of delivery. The developer will contract with a RP prior to commencement of construction and they are – in effect – acting as a contractor, with their risk limited to cost only. After contracting with the RP, there is no sales risk to the developer. In contract, the market housing construction will typically commence before any units are sold and sales risk is present well into the development period.

### 3.12 Sales & Marketing Costs

- 3.12.1 We have adopted industry standard cost assumptions to reflect the cost of sales and marketing and we tabulate these costs in Table 3.13.1

**Table 3.12.1: Sales and Marketing Costs**

Cost Heading	Cost (%)
Sales Agent Fee	1.5%
Marketing Costs	1.5%
Sales Legal Fee	0.5%

## 4 Benchmark Site Value

Land values for Greenfield sites currently used as agricultural land typically transact in the region of £20,000 - £22,000 per hectare. However, landowners are unlikely to release their land for development at such low values. The extent of 'uplift' required is often a matter of debate and has been considered by CLG research on land values. This research indicates a range of £0.247m to £0.371m per gross hectare<sup>4</sup>.

In arriving at benchmark land values for each site we have adopted a value for the gross developable area of each site of £0.35m per hectare toward the upper end of the range and £0.25m toward the bottom on the basis of the values outlined in the CLG research for Greenfield development Land.

The price per hectare at which any development land could transact will be dependent upon a range of factors such as the extent of infrastructure costs, affordable housing provision, costs of strategic transport links and the market's perception of future values and costs. As a result, land could potentially transact at a range of land values dependent upon the individual circumstances of each site.

It should be highlighted that land values are not fixed and can (and should) be flexible to accommodate planning requirements such as affordable housing. We would draw the readers' attention to the comments on land values in the Examiner's report on the Mayor of London's CIL<sup>5</sup>, which indicates that land owners will need to adjust their expectations to accommodate allowances for infrastructure. Whilst these comments related to a CIL report the same principle should also apply to additional planning obligations such as affordable housing and S106 obligations.

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<sup>4</sup> CLG 'Cumulative impacts of regulations on house builders and landowners Research paper' 2011

<sup>5</sup> Para 32: "the price paid for development land may be reduced.... a reduction in development land value is an inherent part of the CIL concept.... in some instances it may be possible for contracts and options to be re-negotiated in the light of the changed circumstances arising from the imposition of CIL charges."



## 5 Appraisal Results

5.1.1 This section sets out the results of our appraisals with the residual land values (RLVs) calculated for each of the development typologies. The RLVs are then compared to benchmark land values at the upper end of the CLG guidance of £0.35m per hectare and the lower end of the range of £0.25m. We tabulate below the results of our assessment of the viability. The typologies that have their results highlighted in red are sites that are not viable when benchmarked against the site value. In our appraisals, we have also incorporated the Council's two CIL rates of £55 and £85 per sq/m.

**Table 5.1.1: 40% affordable housing, Benchmark Site Value of £0.35m per hectare and CIL rate of £85 per sq/m**

HMA	Typology	Residual land value (£millions)	Gross site area	Residual per gross ha (£millions)	BLV (£m)	RLV less BLV (£m)
East	Class 1 - 10 units	£1.32	0.6	£2.06	£0.35	£1.71
East	Class 2 - 35 Units	£2.10	1.3	£1.68	£0.35	£1.33
East	Class 3 - 95 Units	£3.57	2.6	£1.38	£0.35	£1.03
East	Class 4 - 225 Units	£9.85	6.8	£1.46	£0.35	£1.11
North & West	Class 1 - 13 Units	£0.57	0.3	£1.83	£0.35	£1.48
North & West	Class 2 - 48 Units	£0.96	0.6	£1.53	£0.35	£1.18
North & West	Class 3 - 100 Units	£1.59	2.7	£0.60	£0.35	£0.25
North & West	Class 4 - 276 Units	£4.94	6.3	£0.78	£0.35	£0.43
South	Class 1 - 13 Units	£0.76	0.4	£2.18	£0.35	£1.83
South	Class 2 - 63 Units	£1.86	1.6	£1.20	£0.35	£0.85
South	Class 3 - 136 Units	£4.00	3.1	£1.30	£0.35	£0.95
South	Class 4 - 336 Units	£8.62	8.2	£1.05	£0.35	£0.70

5.1.2 In summary, the results of our assessment demonstrate that each of the typologies are viable with 40% affordable housing and generate a surplus when benchmarked against a site value of £0.35m per hectare. We tabulate in Table 5.1.2 our appraisal results benchmarked against a site value of £0.25m per hectare.

**Table 5.1.2: 40% Affordable Housing, Benchmark Site Value of £0.25m per hectare and CIL rate of £85 per sq/m**

HMA	Typology	Residual land value (£millions)	Gross site area	Residual per gross ha (£millions)	BLV (£m)	RLV less BLV (£m)
East	Class 1 - 10 units	£1.32	0.6	£2.06	£0.25	£1.81
East	Class 2 - 35 Units	£2.10	1.3	£1.68	£0.25	£1.43
East	Class 3 - 95 Units	£3.57	2.6	£1.38	£0.25	£1.13
East	Class 4 - 225 Units	£9.85	6.8	£1.46	£0.25	£1.21
North & West	Class 1 - 13 Units	£0.57	0.3	£1.83	£0.25	£1.58
North & West	Class 2 - 48 Units	£0.96	0.6	£1.53	£0.25	£1.28
North & West	Class 3 - 100 Units	£1.38	2.7	£0.60	£0.25	£0.35
North & West	Class 4 - 276 Units	£4.94	6.3	£0.78	£0.25	£0.53
South	Class 1 - 13 Units	£0.76	0.4	£2.18	£0.25	£1.93
South	Class 2 - 63 Units	£1.86	1.6	£1.20	£0.25	£0.95
South	Class 3 - 136 Units	£4.00	3.1	£1.30	£0.25	£1.05
South	Class 4 - 336 Units	£8.62	8.2	£1.05	£0.25	£0.80

5.1.3 In summary, when the residual land values of the typologies are compared to a benchmark of £0.25m per hectare all of the typologies can support 40% affordable housing in addition to a larger surplus than those tabulated in Table 5.1.1.

5.1.4 We tabulate in Table 5.1.4 and Table 5.1.5 our appraisal results adopting a CIL rate of £55 per sq/m and benchmark site values of £0.25m and £0.35m. Due to the lower CIL rates all of the typologies are viable with 30% affordable housing and generate a surplus in excess of the typologies with a CIL rate of £85 per sq/m.

**Table 5.1.4: 30% Affordable Housing, Benchmark Site Value of £0.35m per hectare and CIL rate of £55 per sq/m**

HMA	Site	Residual land value (£millions)	Gross site area	Residual per gross ha (£millions)	BLV (£m)	RLV less BLV (£m)
East	Class 1 - 10 units	£1.33	0.64	£2.08	£0.35	£1.73
East	Class 2 - 35 Units	£2.46	1.25	£1.97	£0.35	£1.62
East	Class 3 - 95 Units	£4.31	2.58	£1.67	£0.35	£1.32
East	Class 4 - 225 Units	£11.70	6.75	£1.73	£0.35	£1.38
North & West	Class 1 - 13 Units	£0.69	0.31	£2.24	£0.35	£1.89
North & West	Class 2 - 48 Units	£1.26	0.63	£2.00	£0.35	£1.65
North & West	Class 3 - 100 Units	£2.16	2.66	£0.81	£0.35	£0.46
North & West	Class 4 - 276 Units	£6.46	6.33	£1.02	£0.35	£0.67
South	Class 1 - 13 Units	£0.91	0.35	£2.61	£0.35	£2.26
South	Class 2 - 63 Units	£2.31	1.55	£1.49	£0.35	£1.14
South	Class 3 - 136 Units	£4.90	3.08	£1.59	£0.35	£1.24
South	Class 4 - 336 Units	£10.63	8.19	£1.30	£0.35	£0.95

**Table 5.1.5: 30% Affordable Housing, Benchmark Site Value of £0.25m per hectare and CIL rate of £55 per sq/m**

HMA	Site	Residual land value (£millions)	Gross site area	Residual per gross ha (£millions)	BLV (£m)	RLV less BLV (£m)
East	Class 1 - 10 units	£1.33	0.64	£2.08	£0.25	£1.83
East	Class 2 - 35 Units	£2.46	1.25	£1.97	£0.25	£1.72
East	Class 3 - 95 Units	£4.31	2.58	£1.67	£0.25	£1.42
East	Class 4 - 225 Units	£11.70	6.75	£1.73	£0.25	£1.48
North & West	Class 1 - 13 Units	£0.69	0.31	£2.24	£0.25	£1.99
North & West	Class 2 - 48 Units	£1.26	0.63	£2.00	£0.25	£1.75
North & West	Class 3 - 100 Units	£2.16	2.66	£0.81	£0.25	£0.56
North & West	Class 4 - 276 Units	£6.46	6.33	£1.02	£0.25	£0.77
South	Class 1 - 13 Units	£0.91	0.35	£2.61	£0.25	£2.36
South	Class 2 - 63 Units	£2.31	1.55	£1.49	£0.25	£1.24
South	Class 3 - 136 Units	£4.90	3.08	£1.59	£0.25	£1.34
South	Class 4 - 336 Units	£10.63	8.19	£1.30	£0.25	£1.05

## 6 Sensitivity Analysis

- 6.1.1 We have utilised our appraisal as the basis for testing sensitivities for each typology. This sensitivity analysis has been provided for illustrative purposes to assist the Council with understanding how the viability might be affected by movements in sales values and construction costs. However, it should be noted that the future trajectory of the housing market is inherently uncertain and predictions in respect of value growth/cost inflation cannot be relied upon. It should be noted that we have retained the benchmark site value range used in the base appraisals, but in practice a fall in sales values should reduce land values and therefore a reduction in sales values may not materially affect viability.

**Table 6.1.1: 5% reduction in market housing sales values, 40% affordable housing, £0.35m benchmark site value and CIL rate of £85 per sq/m**

HMA	Site	Residual land value (£millions)	Gross site area	Residual per gross ha (£millions)	BLV (£m)	RLV less BLV (£m)
East	Class 1 - 10 units	£1.18	0.64	£1.85	£0.35	£1.50
East	Class 2 - 35 Units	£1.81	1.25	£1.45	£0.35	£1.10
East	Class 3 - 95 Units	£2.99	2.58	£1.16	£0.35	£0.81
East	Class 4 - 225 Units	£8.46	6.75	£1.25	£0.35	£0.90
North & West	Class 1 - 13 Units	£0.47	0.31	£1.52	£0.35	£1.17
North & West	Class 2 - 48 Units	£0.68	0.63	£1.08	£0.35	£0.73
North & West	Class 3 - 100 Units	£0.92	2.66	£0.34	£0.35	- £0.01
North & West	Class 4 - 276 Units	£3.61	6.33	£0.57	£0.35	£0.22
South	Class 1 - 13 Units	£0.66	0.35	£1.88	£0.35	£1.53
South	Class 2 - 63 Units	£1.47	1.55	£0.95	£0.35	£0.60
South	Class 3 - 136 Units	£3.26	3.08	£1.06	£0.35	£0.71
South	Class 4 - 336 Units	£6.99	8.19	£0.85	£0.35	£0.50

- 6.1.2 In summary, a 5% reduction in market housing sales values does not affect the viability of 11 of the typologies across the HMAs. However, the 100 unit typology in the north and west becomes marginally unviable with a deficit of £0.01m per hectare when benchmarked against a site value of £0.35m per hectare.

**Table 6.1.2: 5% reduction in market housing sales values, 40% affordable housing, £0.25m benchmark site value and CIL rate of £85 per sq/m**

HMA	Site	Residual land value (£millions)	Gross site area	Residual per gross ha (£millions)	BLV (£m)	RLV less BLV (£m)
East	Class 1 - 10 units	£1.18	0.64	£1.85	£0.25	£1.60
East	Class 2 - 35 Units	£1.81	1.25	£1.45	£0.25	£1.20
East	Class 3 - 95 Units	£2.99	2.58	£1.16	£0.25	£0.91
East	Class 4 - 225 Units	£8.46	6.75	£1.25	£0.25	£1.00
North & West	Class 1 - 13 Units	£0.47	0.31	£1.52	£0.25	£1.27
North & West	Class 2 - 48 Units	£0.68	0.63	£1.08	£0.25	£0.83
North & West	Class 3 - 100 Units	£0.92	2.66	£0.34	£0.25	£0.09
North & West	Class 4 - 276 Units	£3.61	6.33	£0.57	£0.25	£0.32
South	Class 1 - 13 Units	£0.66	0.35	£1.88	£0.25	£1.63
South	Class 2 - 63 Units	£1.47	1.55	£0.95	£0.25	£0.70
South	Class 3 - 136 Units	£3.26	3.08	£1.06	£0.25	£0.81
South	Class 4 - 336 Units	£6.99	8.19	£0.85	£0.25	£0.60

6.1.3 When a 5% reduction in sales values is benchmarked against a site value of £0.25m per hectare all of the typologies are viable across each of the HMAs.

**Table 6.1.3: 5% reduction in market housing sales values, 30% affordable housing, £0.35m benchmark site value and CIL rate of £55 per sq/m**

HMA	Site	Residual land value (£millions)	Gross site area	Residual per gross ha (£millions)	BLV (£m)	RLV less BLV (£m)
East	Class 1 - 10 units	£1.20	0.64	£1.87	£0.35	£1.52
East	Class 2 - 35 Units	£2.15	1.25	£1.72	£0.35	£1.37
East	Class 3 - 95 Units	£3.68	2.58	£1.43	£0.35	£1.08
East	Class 4 - 225 Units	£10.17	6.75	£1.51	£0.35	£1.16
North & West	Class 1 - 13 Units	£0.59	0.31	£1.89	£0.35	£1.54
North & West	Class 2 - 48 Units	£0.97	0.63	£1.54	£0.35	£1.19
North & West	Class 3 - 100 Units	£1.38	2.66	£0.52	£0.35	£0.17
North & West	Class 4 - 276 Units	£5.03	6.33	£0.79	£0.35	£0.44
South	Class 1 - 13 Units	£0.79	0.35	£2.27	£0.35	£1.92
South	Class 2 - 63 Units	£1.89	1.55	£1.22	£0.35	£0.87
South	Class 3 - 136 Units	£4.09	3.08	£1.33	£0.35	£0.98
South	Class 4 - 336 Units	£8.85	8.19	£1.08	£0.35	£0.73

6.1.4 When a CIL rate of £55 per sq/m is adopted together with a 5% reduction in market housing sales values all of the typologies are viable when benchmarked against a site value of £0.35m per hectare.

**Table 6.1.4: 5% reduction in market housing sales values, 30% affordable housing, £0.25m benchmark site value and CIL rate of £55 per sq/m**

HMA	Site	Residual land value (£millions)	Gross site area	Residual per gross ha (£millions)	BLV (£m)	RLV less BLV (£m)
East	Class 1 - 10 units	£1.20	0.64	£1.87	£0.25	£1.62
East	Class 2 - 35 Units	£2.15	1.25	£1.72	£0.25	£1.47
East	Class 3 - 95 Units	£3.68	2.58	£1.43	£0.25	£1.18
East	Class 4 - 225 Units	£10.17	6.75	£1.51	£0.25	£1.26
North & West	Class 1 - 13 Units	£0.59	0.31	£1.89	£0.25	£1.64
North & West	Class 2 - 48 Units	£0.97	0.63	£1.54	£0.25	£1.29
North & West	Class 3 - 100 Units	£1.38	2.66	£0.52	£0.25	£0.27
North & West	Class 4 - 276 Units	£5.03	6.33	£0.79	£0.25	£0.54
South	Class 1 - 13 Units	£0.79	0.35	£2.27	£0.25	£2.02
South	Class 2 - 63 Units	£1.89	1.55	£1.22	£0.25	£0.97
South	Class 3 - 136 Units	£4.09	3.08	£1.33	£0.25	£1.08
South	Class 4 - 336 Units	£8.85	8.19	£1.08	£0.25	£0.83

6.1.5 When a CIL rate of £55 per sq/m is adopted together with a 5% reduction in market housing sales values all of the typologies are viable when benchmarked against a site value of £0.25m per hectare.

6.1.6 We have also modelled a sensitivity analysis which demonstrates the performance of the typologies if construction costs are increased by 5%.



**Table 6.1.5: 5% increase in construction costs, 40% Affordable Housing, Benchmark Site Value of £0.35m, CIL rate of £85 per sq/m**

HMA	Site	Residual land value (£millions)	Gross site area	Residual per gross ha (£millions)	BLV (£m)	RLV less BLV (£m)
East	Class 1 - 10 units	£1.25	0.64	£1.96	£0.35	£1.61
East	Class 2 - 35 Units	£1.87	1.25	£1.50	£0.35	£1.15
East	Class 3 - 95 Units	£3.07	2.58	£1.19	£0.35	£0.84
East	Class 4 - 225 Units	£8.72	6.75	£1.29	£0.35	£0.94
North & West	Class 1 - 13 Units	£0.48	0.31	£1.55	£0.35	£1.20
North & West	Class 2 - 48 Units	£0.67	0.63	£1.06	£0.35	£0.71
<b>North &amp; West</b>	<b>Class 3 - 100 Units</b>	<b>£0.89</b>	<b>2.66</b>	<b>£0.33</b>	<b>£0.35</b>	<b>- £0.02</b>
North & West	Class 4 - 276 Units	£3.59	6.33	£0.57	£0.35	£0.22
South	Class 1 - 13 Units	£0.68	0.35	£1.93	£0.35	£1.58
South	Class 2 - 63 Units	£1.49	1.55	£0.96	£0.35	£0.61
South	Class 3 - 136 Units	£3.33	3.08	£1.08	£0.35	£0.73
South	Class 4 - 336 Units	£7.13	8.19	£0.87	£0.35	£0.52

6.1.7 In summary, a 5% reduction in market housing sales values does not affect the viability of 11 of the typologies across the HMAs. However, the 100 unit typology in the north and west becomes marginally unviable with a deficit of £0.02m per hectare when benchmarked against a site value of £0.35m per hectare.

**Table 6.1.6: 5% increase in construction costs, 40% Affordable Housing, Benchmark Site Value of £0.25m, CIL rate of £85 per sq/m**

HMA	Site	Residual land value (£millions)	Gross site area	Residual per gross ha (£millions)	BLV (£m)	RLV less BLV (£m)
East	Class 1 - 10 units	£1.25	0.64	£1.96	£0.25	£1.71
East	Class 2 - 35 Units	£1.87	1.25	£1.50	£0.25	£1.25
East	Class 3 - 95 Units	£3.07	2.58	£1.19	£0.25	£0.94
East	Class 4 - 225 Units	£8.72	6.75	£1.29	£0.25	£1.04
North & West	Class 1 - 13 Units	£0.48	0.31	£1.55	£0.25	£1.30
North & West	Class 2 - 48 Units	£0.67	0.63	£1.06	£0.25	£0.81
North & West	Class 3 - 100 Units	£0.89	2.66	£0.33	£0.25	£0.08
North & West	Class 4 - 276 Units	£3.59	6.33	£0.57	£0.25	£0.32
South	Class 1 - 13 Units	£0.68	0.35	£1.93	£0.25	£1.68
South	Class 2 - 63 Units	£1.49	1.55	£0.96	£0.25	£0.71
South	Class 3 - 136 Units	£3.33	3.08	£1.08	£0.25	£0.83
South	Class 4 - 336 Units	£7.13	8.19	£0.87	£0.25	£0.62

6.1.8 When the compared to a site benchmark of £0.25m, all of the typologies are viable and the 100 unit typology in the north and west HMA which was marginally unviable against a site of value of £0.35m generates a surplus of £0.08m.

**Table 6.1.7: 5% increase in construction costs, 30% Affordable Housing, Benchmark Site Value of £0.35m, CIL rate of £55 per sq/m**

HMA	Site	Residual land value (£millions)	Gross site area	Residual per gross ha (£millions)	BLV (£m)	RLV less BLV (£m)
East	Class 1 - 10 units	£1.26	0.64	£1.97	£0.35	£1.62
East	Class 2 - 35 Units	£2.24	1.25	£1.79	£0.35	£1.44
East	Class 3 - 95 Units	£3.82	2.58	£1.48	£0.35	£1.13
East	Class 4 - 225 Units	£10.59	6.75	£1.57	£0.35	£1.22
North & West	Class 1 - 13 Units	£0.61	0.31	£1.96	£0.35	£1.61
North & West	Class 2 - 48 Units	£0.97	0.63	£1.54	£0.35	£1.19
North & West	Class 3 - 100 Units	£1.40	2.66	£0.53	£0.35	£0.18
North & West	Class 4 - 276 Units	£5.15	6.33	£0.81	£0.35	£0.46
South	Class 1 - 13 Units	£0.83	0.35	£2.36	£0.35	£2.01
South	Class 2 - 63 Units	£1.95	1.55	£1.26	£0.35	£0.91
South	Class 3 - 136 Units	£4.24	3.08	£1.38	£0.35	£1.03
South	Class 4 - 336 Units	£9.17	8.19	£1.12	£0.35	£0.77

6.1.9 When a CIL rate of £55 per sq/m is applied to the typologies all of the typologies are viable when benchmarked against a site value of £0.35m per hectare and generate a surplus in excess of the site value.

**Table 6.1.8: 5% increase in construction costs, 30% Affordable Housing, Benchmark Site Value of £0.25m, CIL rate of £55 per sq/m**

HMA	Site	Residual land value (£millions)	Gross site area	Residual per gross ha (£millions)	BLV (£m)	RLV less BLV (£m)
East	Class 1 - 10 units	£1.26	0.64	£1.97	£0.35	£1.72
East	Class 2 - 35 Units	£2.24	1.25	£1.79	£0.35	£1.54
East	Class 3 - 95 Units	£3.82	2.58	£1.48	£0.35	£1.23
East	Class 4 - 225 Units	£10.59	6.75	£1.57	£0.35	£1.32
North & West	Class 1 - 13 Units	£0.61	0.31	£1.96	£0.35	£1.71
North & West	Class 2 - 48 Units	£0.97	0.63	£1.54	£0.35	£1.29
North & West	Class 3 - 100 Units	£1.40	2.66	£0.53	£0.35	£0.28
North & West	Class 4 - 276 Units	£5.15	6.33	£0.81	£0.35	£0.56
South	Class 1 - 13 Units	£0.83	0.35	£2.36	£0.35	£2.11
South	Class 2 - 63 Units	£1.95	1.55	£1.26	£0.35	£1.01
South	Class 3 - 136 Units	£4.24	3.08	£1.38	£0.35	£1.13
South	Class 4 - 336 Units	£9.17	8.19	£1.12	£0.35	£0.87

6.1.10 Whilst we have demonstrated the performance of the typologies in the event that sales values reduce by 5% and construction costs increase by 5%, we have also modelled the appraisal results assuming that sales values increase by 10%. We tabulate the results of this analysis in Tables 6.1.9 to 6.1.12 set out below.

**Table 6.1.9: 10% increase in market housing values, 40% Affordable Housing, Benchmark Site Value of £0.35m, CIL rate of £85 per sq/m**

HMA	Site	Residual land value (£millions)	Gross site area	Residual per gross ha (£millions)	BLV (£m)	RLV less BLV (£m)
East	Class 1 - 10 units	£1.32	0.64	£2.06	£0.35	£1.71
East	Class 2 - 35 Units	£2.10	1.25	£1.68	£0.35	£1.33
East	Class 3 - 95 Units	£3.57	2.58	£1.38	£0.35	£1.03
East	Class 4 - 225 Units	£9.85	6.75	£1.46	£0.35	£1.11
North & West	Class 1 - 13 Units	£0.57	0.31	£1.83	£0.35	£1.48
North & West	Class 2 - 48 Units	£0.96	0.63	£1.53	£0.35	£1.18
North & West	Class 3 - 100 Units	£1.38	2.66	£0.52	£0.35	£0.17
North & West	Class 4 - 276 Units	£4.94	6.33	£0.78	£0.35	£0.43
South	Class 1 - 13 Units	£0.76	0.35	£2.18	£0.35	£1.83
South	Class 2 - 63 Units	£1.86	1.55	£1.20	£0.35	£0.85
South	Class 3 - 136 Units	£4.00	3.08	£1.30	£0.35	£0.95
South	Class 4 - 336 Units	£8.62	8.19	£1.05	£0.35	£0.70

**Table 6.1.10: 10% increase in market housing values, 40% Affordable Housing, Benchmark Site Value of £0.25m, CIL rate of £85 per sq/m**

HMA	Site	Residual land value (£millions)	Gross site area	Residual per gross ha (£millions)	BLV (£m)	RLV less BLV (£m)
East	Class 1 - 10 units	£1.32	0.64	£2.06	£0.35	£1.81
East	Class 2 - 35 Units	£2.10	1.25	£1.68	£0.35	£1.43
East	Class 3 - 95 Units	£3.57	2.58	£1.38	£0.35	£1.13
East	Class 4 - 225 Units	£9.85	6.75	£1.46	£0.35	£1.21
North & West	Class 1 - 13 Units	£0.57	0.31	£1.83	£0.35	£1.58
North & West	Class 2 - 48 Units	£0.96	0.63	£1.53	£0.35	£1.28
North & West	Class 3 - 100 Units	£1.38	2.66	£0.52	£0.35	£0.27
North & West	Class 4 - 276 Units	£4.94	6.33	£0.78	£0.35	£0.53
South	Class 1 - 13 Units	£0.76	0.35	£2.18	£0.35	£1.93
South	Class 2 - 63 Units	£1.86	1.55	£1.20	£0.35	£0.95
South	Class 3 - 136 Units	£4.00	3.08	£1.30	£0.35	£1.05
South	Class 4 - 336 Units	£8.62	8.19	£1.05	£0.35	£0.80

**Table 6.1.11: 10% increase in market housing values, 30% Affordable Housing, Benchmark Site Value of £0.35m, CIL rate of £55 per sq/m**

HMA	Site	Residual land value (£millions)	Gross site area	Residual per gross ha (£millions)	BLV (£m)	RLV less BLV (£m)
East	Class 1 - 10 units	£1.60	0.64	£2.50	£0.35	£2.15
East	Class 2 - 35 Units	£3.08	1.25	£2.47	£0.35	£2.12
East	Class 3 - 95 Units	£5.56	2.58	£2.15	£0.35	£1.80
East	Class 4 - 225 Units	£14.74	6.75	£2.18	£0.35	£1.83
North & West	Class 1 - 13 Units	£0.91	0.31	£2.93	£0.35	£2.58
North & West	Class 2 - 48 Units	£1.88	0.63	£2.99	£0.35	£2.64
North & West	Class 3 - 100 Units	£2.83	2.66	£1.06	£0.35	£0.71
North & West	Class 4 - 276 Units	£9.28	6.33	£1.47	£0.35	£1.12
South	Class 1 - 13 Units	£1.15	0.35	£3.29	£0.35	£2.94
South	Class 2 - 63 Units	£3.13	1.55	£2.02	£0.35	£1.67
South	Class 3 - 136 Units	£6.49	3.08	£2.11	£0.35	£1.76
South	Class 4 - 336 Units	£14.13	8.19	£1.73	£0.35	£1.38

**Table 6.1.12: 10% increase in market housing values, 40% Affordable Housing, Benchmark Site Value of £0.25m, CIL rate of £55 per sq/m**

HMA	Site	Residual land value (£millions)	Gross site area	Residual per gross ha (£millions)	BLV (£m)	RLV less BLV (£m)
East	Class 1 - 10 units	£1.60	0.64	£2.50	£0.25	£2.25
East	Class 2 - 35 Units	£3.08	1.25	£2.47	£0.25	£2.22
East	Class 3 - 95 Units	£5.56	2.58	£2.15	£0.25	£1.90
East	Class 4 - 225 Units	£14.74	6.75	£2.18	£0.25	£1.93
North & West	Class 1 - 13 Units	£0.91	0.31	£2.93	£0.25	£2.68
North & West	Class 2 - 48 Units	£1.88	0.63	£2.99	£0.25	£2.74
North & West	Class 3 - 100 Units	£2.83	2.66	£1.06	£0.25	£0.81
North & West	Class 4 - 276 Units	£9.28	6.33	£1.47	£0.25	£1.22
South	Class 1 - 13 Units	£1.15	0.35	£3.29	£0.25	£3.04
South	Class 2 - 63 Units	£3.13	1.55	£2.02	£0.25	£1.77
South	Class 3 - 136 Units	£6.49	3.08	£2.11	£0.25	£1.86
South	Class 4 - 336 Units	£14.13	8.19	£1.73	£0.25	£1.48

**6.2** In summary, all of the typologies tabulated above with a 10% increase in sales values generate a surplus when compared to the site value benchmarks and can therefore support 40% affordable housing.

**6.2.1** Finally, we have modelled a sensitivity analysis which demonstrates the performance of the typologies when sales values increase by 10% and construction costs increase by 5%.

**Table 6.1.13: 10% increase in market housing sales values 5% increase in construction costs, 40% Affordable Housing, Benchmark Site Value of £0.35m, CIL rate of £85 per sq/m**

HMA	Site	Residual land value (£millions)	Gross site area	Residual per gross ha (£millions)	BLV (£m)	RLV less BLV (£m)
East	Class 1 - 10 units	£1.52	0.64	£2.38	£0.35	£2.03
East	Class 2 - 35 Units	£2.44	1.25	£1.95	£0.35	£1.60
East	Class 3 - 95 Units	£4.22	2.58	£1.64	£0.35	£1.29
East	Class 4 - 225 Units	£11.50	6.75	£1.70	£0.35	£1.35
North & West	Class 1 - 13 Units	£0.67	0.31	£2.17	£0.35	£1.82
North & West	Class 2 - 48 Units	£1.23	0.63	£1.96	£0.35	£1.61
North & West	Class 3 - 100 Units	£1.81	2.66	£0.68	£0.35	£0.33
North & West	Class 4 - 276 Units	£6.23	6.33	£0.98	£0.35	£0.63
South	Class 1 - 13 Units	£0.89	0.35	£2.55	£0.35	£2.20
South	Class 2 - 63 Units	£2.24	1.55	£1.45	£0.35	£1.10
South	Class 3 - 136 Units	£4.80	3.08	£1.56	£0.35	£1.21
South	Class 4 - 336 Units	£10.37	8.19	£1.27	£0.35	£0.92



**Table 6.1.14: 10% increase in market housing sales values 5% increase in construction costs, 40% Affordable Housing, Benchmark Site Value of £0.25m, CIL rate of £85 per sq/m**

HMA	Site	Residual land value (£millions)	Gross site area	Residual per gross ha (£millions)	BLV (£m)	RLV less BLV (£m)
East	Class 1 - 10 units	£1.52	0.64	£2.38	£0.35	£2.13
East	Class 2 - 35 Units	£2.44	1.25	£1.95	£0.35	£1.70
East	Class 3 - 95 Units	£4.22	2.58	£1.64	£0.35	£1.49
East	Class 4 - 225 Units	£11.50	6.75	£1.70	£0.35	£1.45
North & West	Class 1 - 13 Units	£0.67	0.31	£2.17	£0.35	£1.92
North & West	Class 2 - 48 Units	£1.23	0.63	£1.96	£0.35	£1.71
North & West	Class 3 - 100 Units	£1.81	2.66	£0.68	£0.35	£0.43
North & West	Class 4 - 276 Units	£6.23	6.33	£0.98	£0.35	£0.73
South	Class 1 - 13 Units	£0.89	0.35	£2.55	£0.35	£2.30
South	Class 2 - 63 Units	£2.24	1.55	£1.45	£0.35	£1.20
South	Class 3 - 136 Units	£4.80	3.08	£1.56	£0.35	£1.31
South	Class 4 - 336 Units	£10.37	8.19	£1.27	£0.35	£1.02

6.2.2 The results of this sensitivity analysis and a benchmark site value of £0.25m per hectare improves the viability of all of the typologies across the HMAs in comparison to the results tabulated in Table 6.1.13.

**Table 6.1.15: 10% increase in market housing sales values, 5% increase in construction costs, 30% Affordable Housing, Benchmark Site Value of £0.35m, CIL rate of £55 per sq/m**

HMA	Site	Residual land value (£millions)	Gross site area	Residual per gross ha (£millions)	BLV (£m)	RLV less BLV (£m)
East	Class 1 - 10 units	1.53	0.64	£2.40	£0.35	£2.05
East	Class 2 - 35 Units	2.86	1.25	£2.29	£0.35	£1.94
East	Class 3 - 95 Units	5.08	2.58	£1.97	£0.35	£1.62
East	Class 4 - 225 Units	13.65	6.75	£2.02	£0.35	£1.67
North & West	Class 1 - 13 Units	0.82	0.31	£2.65	£0.35	£2.30
North & West	Class 2 - 48 Units	1.59	0.63	£2.53	£0.35	£2.18
North & West	Class 3 - 100 Units	2.39	2.66	£0.90	£0.35	£0.55
North & West	Class 4 - 276 Units	8.01	6.33	£1.27	£0.35	£0.92
South	Class 1 - 13 Units	1.06	0.35	£3.04	£0.35	£2.69
South	Class 2 - 63 Units	2.77	1.55	£1.79	£0.35	£1.44
South	Class 3 - 136 Units	5.85	3.08	£1.90	£0.35	£1.55
South	Class 4 - 336 Units	12.71	8.19	£1.55	£0.35	£1.20

6.2.3 In summary, a reduction to the CIL rate from £85 per sq/m to £55 per sq/m improves the viability of the typologies with 30% affordable housing.

**Table 6.1.16: 10% increase in market housing sales values 5% increase in construction costs, 30% Affordable Housing, Benchmark Site Value of £0.25m, CIL rate of £55 per sq/m**

HMA	Site	Residual land value (£millions)	Gross site area	Residual per gross ha (£millions)	BLV (£m)	RLV less BLV (£m)
East	Class 1 - 10 units	£1.53	0.64	£2.40	£0.25	£2.15
East	Class 2 - 35 Units	£2.86	1.25	£2.29	£0.25	£2.04
East	Class 3 - 95 Units	£5.08	2.58	£1.97	£0.25	£1.72
East	Class 4 - 225 Units	£13.65	6.75	£2.02	£0.25	£1.77
North & West	Class 1 - 13 Units	£0.82	0.31	£2.65	£0.25	£2.40
North & West	Class 2 - 48 Units	£1.59	0.63	£2.53	£0.25	£2.28
North & West	Class 3 - 100 Units	£2.39	2.66	£0.90	£0.25	£0.65
North & West	Class 4 - 276 Units	£8.01	6.33	£1.27	£0.25	£1.02
South	Class 1 - 13 Units	£1.06	0.35	£3.04	£0.25	£2.79
South	Class 2 - 63 Units	£2.77	1.55	£1.79	£0.25	£1.54
South	Class 3 - 136 Units	£5.85	3.08	£1.90	£0.25	£1.65
South	Class 4 - 336 Units	£12.71	8.19	£1.55	£0.25	£1.30

6.2.4 In summary, a reduction to the benchmark site value from £0.35m to £0.25m improves the viability of the typologies with 30% affordable housing.

## 7 Strategic Sites

### 7.1 Sites and Appraisal Assumptions

7.1.1 This section outlines our approach to testing the viability of a strategic development identified by the Council and we tabulate in Table 7.1.1 the site we have tested.

**Table 7.1.1: Strategic Site**

Site	Density – Units per Ha	Units	Employment / Local Centre	Country Park (Ha)	Green Space	School (Ha)	Residential Developable Area (Ha)
Netherhampton Road	43	640	5.8	33	7.35	1.8	14.85

7.1.2 Our appraisal of Netherhampton Road adopts the following assumptions tabulated in Table 7.1.2.

**Table 7.1.2: Strategic Site Appraisal Assumptions**

Appraisal Heading	Assumption
Unit Mix	85% Houses, 15% Flats
Market Housing Sales Values	£3,498 per sq/m
Affordable Housing	40% (70% affordable rent, 30% shared ownership)
Employment Land Value	£200,000 per hectare
Construction Cost Rate	Flats: £1,095 per sq/m Houses: £1,307 per sq/m Blended Cost Rate: £1,118 per sq/m
Construction Contingency	5%
On-site Infrastructure	£16,000 per unit
Professional Fees	8%
Profit	20% on GV for market housing units 6% on value for affordable housing units
Section 106 Costs	Road Improvement Costs: £5,152,000 Education: £5,251,503
Community Infrastructure Levy	£85 per sq/m
Sales Rates Assumptions	8 per month (multiple sales/marketing outlets)
Finance Rate	7%

### 7.2 Benchmark Site Value

We tabulate in Table 7.2.1 the benchmark site values we have calculated on the basis of the site areas tabulated in Table 7.1.1. As with the development typologies we have applied a value of £250,000 and £350,000 per hectare to the gross developable area to reflect the lower and upper end of the CLG range referenced in section 4 of this report in addition to a value of £10,000 per hectare for the Country Park.

**Table 7.2.1: Netherhampton Road Benchmark Site Values**

Value per hectare	Gross developable area (30 ha)	Country Park (33 ha)	Site Value	Benchmark per Ha
£350,000 & £10,000 (Country Park)	£10,500,000	£330,000	£10,830,000	c. £164,000
£250,000 & £10,000 (Country Park)	£7,500,000	£330,000	£7,830,000	c. £119,000

### 7.3 Appraisal Results

7.3.1 We set out below the results of our assessment of Netherhampton Road with 40% affordable housing and the appraisal assumptions tabulated in Table 7.1.2.

**Table 7.3.1: Appraisal Results with Benchmark Land Value at £0.35m per hectare and Country Park at £0.01m per hectare**

Residual Land Value	Benchmark Land Value	Surplus/ (Deficit)	Benchmark Per Hectare	RLV per Hectare	Surplus/ (Deficit) per hectare
c. £17.06m	£10.83m	£6.23m	c. £0.16m	c. £0.26m	£0.10m

7.3.2 The results above demonstrate that with 40% affordable housing Netherhampton Road generates a surplus of £0.10m per hectare when compared to the benchmark land value of c. £0.16m per hectare. As a result, the scheme can support 40% affordable housing and support site specific payments towards roads and education.

7.3.3 We have benchmarked our appraisal results against a land value at the lower end of the CLG range and we tabulate the results below.

**Table 7.3.3: Appraisal Results with Benchmark Land Value at £0.25m per hectare and Country Park at £0.01m per hectare**

Residual Land Value	Benchmark Land Value	Surplus/ (Deficit)	Benchmark Per Hectare	RLV per Hectare	Surplus/ (Deficit) per hectare
c. £17.06m	£7.83m	£9.23m	c. £0.119m	c. £0.26m	£0.141m

7.3.4 In this scenario the adoption of a benchmark land value which reflects the value of land at the lower end of the CLG research range ensures that the site can generate a surplus of c. £0.14m.



## 8 Conclusions

- 8.1.1 The NPPF states that the cumulative impact of local planning authority standards and policies “should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle”. This report tests this proposition in Wiltshire.
- 8.1.2 We have tested the impact of the Council’s affordable housing target of 40% based upon a CIL rate of £85 per sq/m and 30% affordable housing based upon a CIL rate of £55 per sq/m, with a tenure mix of 70% rented and 30% intermediate housing. Our appraisals indicate that on a current day basis the development typologies that we have tested can support a policy compliant level of affordable housing when benchmarked against either the upper benchmark site value of £0.35m per hectare or at the lower benchmark site value of £0.25m.
- 8.1.3 While scheme-specific viability on individual applications can be determined relatively accurately at the point of application, viability changes over time. Residual land values are very sensitive to changes in sales values and build costs, which can vary significantly over the development period. As a result, we have modelled a sensitivity analysis that demonstrates the performance of development typologies in the event that sales values and construction costs increase or decrease.
- 8.1.4 Our analysis demonstrates that the development typologies can support policy compliant affordable housing in the event that sales values decrease or construction costs increase. We stress that when sales values decrease generally site values will decrease and as a result the viability of these sites will improve when land values are adjusted. To demonstrate this point, the 100 unit typology in the north and west HMA which was marginally unviable against a site of value of £0.35m generates a surplus of £0.08m when benchmarked against a site value of £0.25m per hectare.
- 8.1.5 Whilst our development typology appraisals indicate that 30% and 40% affordable housing is supportable dependent upon the CIL rate that applies, there will inevitably be a degree of negotiation when site specific schemes come forward through the planning process due to scheme-specific factors that cannot be determined in a high level assessment of generic development typologies. This issue is, however, adequately addressed through planning policy measures that are in place that recognise that the actual amounts of affordable housing delivered on individual schemes may vary when scheme-specific viability issues emerge.
- 8.1.6 In addition to assessing a number of typologies we have also tested a specific strategic site at Netherhampton Road in Salisbury which takes into account the costs of site specific S106 obligations (road and education payments). Our assessment of this site demonstrates that this site can support 40% affordable housing and the specific section 106 obligations whilst generating a significant financial surplus when benchmarked against our site value range.
- 8.1.7 As noted in earlier sections of this report, the NPPF requires that developments should generate a competitive return for developers and landowners. The competitive return for developers is addressed through the inclusion of a profit margin as a cost in each appraisal. The return to the landowner needs to be addressed through a capital sum for releasing land for development.
- 8.1.8 It should be noted that there is no single threshold return that can be assumed for all landowners and, in practice, the return would be scheme specific and determined by individual site factors.
- 8.1.9 However it is clear from the results set out above that benchmark land values have a significant influence on the level of surplus in addition to the 40% affordable housing that each site/typology can support. Assumptions about owners’ expectations of land value make a large difference in terms of viability.

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