

Wiltshire Housing Site Allocations DPD

Topic Paper 3 - Addendum: Housing Land Supply

Cabinet version – May 2018

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 Topic Paper 3: Housing Land Supply was prepared and published in June 2017 to demonstrate the Council's housing land supply position. The housing land supply is needed 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.
- 1.3 At the time the Plan was released for pre-submission consultation in July 2017 the Council was undertaking its annual completion and developer surveying exercise for the 2016/2017 monitoring year. In order to present a position that represented the anticipated housing land supply at the point of examination as closely as possible and to conform to national policy on evidence¹, the Council produced an **estimated 2017 base date housing land supply position** in order to inform the Plan. This was 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 Since then the Council has completed its surveying activities for the 2016/2017 monitoring year, and now has a **confirmed 2017 base date housing land supply position**. This Addendum has been produced to demonstrate how any changes in the housing land supply arising from the estimated position to the confirmed position could affect the development and strategy of the Plan.

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)
 - 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 Addendum is to set out how the housing land supply position has evolved over the preparation of the Plan to the confirmed 2017 position. It shows how housing delivery and provision of land supply has progressed over time in each of the

¹ National Planning Policy Framework paragraph 158

Housing Market Areas (HMA) and Community Areas set out in the WCS. Topic Paper 3 explains how the estimated 2017 housing land supply position was formulated to provide 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.

- 2.3 Any significant changes from the estimated position to the confirmed position could have the potential to affect the output from the methodology, and subsequently the development of the Plan proposals. Where such a significant change has occurred, and what the potential impact on the Plan is, will be highlighted and explained in the Topic Paper 4 Addendum.

3 HOUSING LAND SUPPLY

- 3.1 In line with national policy² and guidance³, the Council produce an annual assessment of deliverable sites that contribute to the housing land supply. This is used 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.
- 3.2 The methodology used to identify completions and developable supply is detailed in Section 3 of Topic Paper 3.
- 3.3 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.
- 3.4 The impact of this can be shown in Table 3.1 below which shows how the residual indicative requirement has changed during the formation of the Plan. This information has informed the final Areas of Search. Cells that are greyed out show years where the indicative residual requirement was met.
- 3.5 As part of its assessment of sites required by national policy, the Council have included the Plan's proposed allocations in its confirmed 2017 housing land supply position, as they consider them to be meet the deliverable and developable criteria set out in national policy. However in order to clearly show the effect of the Plan and how it meets its objectives, the 'Residual indicative requirement 2017' shown in Table 3.1 **excludes** the proposed allocations. This can be considered to show the 'before'

² National Planning Policy Framework (March 2012) - paragraph 47.

³ Planning Practice Guidance (originally published March 2014) - "Housing and economic land availability assessment" paragraphs 3-030 and 3-033

position. The 'after' position (which will include delivery from the proposed allocations) will be discussed in the Topic Paper 4 Addendum.

Table 3.1: Residual indicative requirements 2014-2017 by Area⁴

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	81
Devizes CA	2,500	543	193	154	81
Marlborough	680	83	35	57	0
Marlborough CA remainder	240	91	81	34	31
Marlborough CA	920	174	116	91	31
Pewsey CA	600	137	54	0	0
Tidworth and Ludgershall	1,750	82	121	88	0
Tidworth CA remainder	170	84	84	75	58
Tidworth CA	1,920	165	205	163	58
EAST WILTSHIRE HMA⁵	5,940	1,019	530	337	5
Bradford on Avon	595	17	64	0	0
Bradford on Avon CA remainder ⁶	185	76	57	61	6
Bradford on Avon CA	780	93	121	61	6
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	264
Chippenham CA remainder	580	149	183	159	75
Chippenham CA	5,090	435	183	1,819	339
Corsham	1,220	330	226	0	0
Corsham CA remainder ⁷	175	0	0	0	0

⁴ Source: Housing Land Supply Statements 2014 – 2017.

⁵ 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.

⁶ 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.

⁷ Totals for Corsham CA remainder and Corsham CA exclude any development at South West Chippenham which is classified as Chippenham Principal Settlement.

Area	Overall indicative requirement 2006-2026	Residual indicative requirement 2014	Residual indicative requirement 2015	Residual indicative requirement 2016	Residual indicative requirement 2017
Corsham CA	1,395	330	226	0	0
Malmesbury	885	0	0	0	0
Malmesbury CA remainder	510	151	116	86	0
Malmesbury CA	1,395	151	116	86	0
Melksham and Bowerhill	2,240	611	616	134	0
Melksham CA remainder ⁸	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 ⁹	385	113	63	0	0
Royal Wootton Bassett and Cricklade CA	1,455	113	63	0	0
Trowbridge	6,810	1,399	1,635	2,017	2,230
Trowbridge CA remainder	165	0	0	0	0
Trowbridge CA	6,975	1,399	1,635	2,017	2,230
Warminster	1,920	317	318	462	335
Warminster CA remainder	140	49	42	31	16
Warminster CA	2,060	365	360	494	351
Westbury	1,500	74	30	38	0
Westbury CA remainder	115	55	48	47	44
Westbury CA	1,615	129	78	84	44
NORTH & WEST WILTSHIRE HMA⁵	24,740	3,603	2,489	1,967	1,109
Amesbury, Bulford and Durrington	2,440	69	155	72	181
Amesbury CA remainder	345	184	138	128	96
Amesbury CA	2,785	253	293	199	278
Mere	235	106	0	0	0

⁸ Totals for Melksham CA remainder and Melksham CA exclude any development at Land North of Green Lane as this is classified as Trowbridge Principal Settlement.

⁹ 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
Mere CA remainder	50	12	8	8	1
Mere CA	285	119	8	8	1
Salisbury & Wilton	6,060	0	0	160	866
Wilton CA remainder	255	102	105	130	118
Salisbury and Wilton CAs	6,315	102	105	289	984
Downton	190	122	115	0	0
Southern Wiltshire CA remainder ¹⁰	425	56	4	0	0
Southern Wiltshire CA	615	177	118	0	0
Tisbury	200	39	26	24	22
Tisbury CA remainder	220	158	154	150	142
Tisbury CA	420	197	180	174	165
SOUTH WILTSHIRE HMA⁵	10,420	722	575	616	1,331
SWINDON (WITHIN WILTSHIRE)	900	1	0	0	0
WILTSHIRE⁵	42,000	5,346	3,544	2,870	2,396

3.6 Since the publication of the pre-submission draft Plan the Council has completed its annual completion and developer surveys. This showed a considerably higher number of housing completions than anticipated in the estimated 2017 figures. At the Market Towns of Marlborough and Tidworth & Ludgershall the confirmed developable commitments are higher than estimated and as a result the indicative residual requirement has now been met. However at the three Principal Settlements (Chippenham, Trowbridge and Salisbury) delays in delivery have resulted in an increase in the indicative requirement for the Plan period.

3.7 At the East HMA provision of supply was higher than in the estimated 2017 position. Greater certainty and an increase in expected delivery at the strategic site at Ludgershall has increased supply, and the making of a number of Neighbourhood Plans in this HMA has also assisted in increasing supply. There is a very small residual indicative requirement to be met.

¹⁰ 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.

- 3.8 At the North & West HMA the significant number of large site permissions granted in the 2017 monitoring year have bolstered supply, however further delays in delivery on strategic allocations in the Wiltshire Core Strategy and Chippenham Site Allocations Plan have counter-acted this effect. There remains an indicative residual requirement to be met by the end of the plan period.
- 3.9 The South HMA residual requirement has been subject to a significant delay at one of the strategic sites. As a result the previous trend of a steady reduction in the residual requirement has now become a significant increase. There remains an indicative residual requirement to be met by the end of the plan period.

Confirmed 2017 position

- 3.10 Topic Paper 3: Housing Land Supply was based on an estimated 2017 housing land supply position compiled solely to inform the Plan. The confirmed 2017 position represents the comprehensive survey of completions and assessment of the various sources of supply. For completeness, the actual completions recorded in the 2016/17 monitoring year are shown in Table 3.2.

Table 3.2: Confirmed 2016/2017 completions

Housing Market Area (HMA)	2016/17 Completions
East Wiltshire HMA	471
North & West Wiltshire HMA	1269
South Wiltshire HMA	794
West of Swindon	156
Wiltshire	2690

Monitoring

- 3.11 The Council's confirmed 5-year housing land supply position (April 2017 base date) **excluding** the Plan's proposed allocations, is illustrated in Table 3.3.

Table 3.3: Confirmed 2017 Housing Land Supply for the Wiltshire HMAs (April 2017 base date) excluding the Plan’s proposed allocations.

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 ¹¹
East Wiltshire HMA	5,940	3,624	1,287	2,164	8.41
North & West Wiltshire HMA	24,740	13,025	6,508	7,680	5.90
South Wiltshire HMA	10,420	5,388	2,796	3,014	5.39
Wiltshire HMAs	41,100	22,037	N/A	12,858	N/A
Swindon (within Wiltshire)	900	622	N/A	201	N/A
Wiltshire Total	42,000	22,659	N/A	13,059	N/A

3.12 As shown in Table 3.3 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 Wiltshire 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.

3.13 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 based on the confirmed 2017 position but **excluding** proposed allocations is shown in Table 3.4.

Table 3.4: 5-year housing land supply position by HMA (2017-2026) excluding the Plan’s proposed allocations.

HMA	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
East	8.41	8.46	8.95	9.79	13.34	12.10	9.78	7.88	5.87
North & West	5.90	6.18	6.18	6.04	5.95	5.73	5.31	4.73	4.07
South	5.39	5.13	4.61	4.12	3.75	3.31	2.55	1.92	1.46

3.14 In the East HMA the confirmed housing land supply position confirms a healthy supply without any further land being allocated, with most years supply exceeding 8 years' worth. The pre-submission Plan indicated that the existing surety of supply until the end of the plan period would suggest allocations for housing at Large Villages here would be unjustified. This appears to remain appropriate.

3.15 In the North & West HMA, the Council’s annual survey of developers and site representatives has indicated potential delivery timescales and build rates on

¹¹ 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.

strategic and large non-strategic sites to be slightly less than set out in the estimated position. The 5-year supply position remains adequate for the majority of the remainder of the Plan period, however it would appear the pre-submission Plan's indication that additional allocations may be needed remains appropriate.

- 3.16 In the South HMA a number of large strategic housing allocations are in the process of being built out. However development at one of these (Churchfields) is subject to significant delay and this is reflected in the worsening of the ongoing 5-year housing land supply position in the South HMA from the estimated position. In the majority of remaining years of the Plan there is a shortage in the required 5.25 years' worth of supply. The pre-submission Plan's suggestion that a greater degree of intervention is needed to meet the Plan objectives remains appropriate.
- 3.17 How the Plan has responded to this in each HMA is explained further in Topic Paper 4 Addendum: Developing Plan Proposals.
- 3.18 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) The Plan follows the principles of the settlement strategy in its parent Plan, the Wiltshire Core Strategy.
- 4.3 Table 4.2 below shows the indicative requirement set out in the Wiltshire Core Strategy¹² and progress on delivery and confirmed committed supply as at April 2017 (excluding the proposed allocations.) 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.

¹² Wiltshire Core Strategy (January 2015) – paragraph 4.26 (incorporating Table 1) and Chapter 5: Area Strategies

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

Table 4.2: Confirmed 2017 summary assessment of supply and residual requirement excluding proposed allocations.

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	Indicative remaining requirement ('quoted')	Indicative remaining requirement ('actual delivery')
Devizes	2,010	1,501	612	0	-103
Devizes CA remainder	490	297	112	81	81
Devizes CA	2,500	1,798	724	81	-22
Marlborough	680	397	304	0	-21
Marlborough CA remainder	240	157	52	31	31
Marlborough CA	920	554	356	31	10
Pewsey CA	600	416	192	0	-8
Tidworth and Ludgershall	1,750	767	1,016	0	-33
Tidworth CA remainder	170	89	23	58	58
Tidworth CA	1,920	856	1,039	58	25
EAST WILTSHIRE HMA	5,940	3,624	2,311	170	5
Bradford on Avon	595	384	218	0	-7
Bradford on Avon CA remainder ¹³	185	123	56	6	6
Bradford on Avon CA	780	507	274	6	-1
Calne	1,440	1,034	847	0	-441
Calne CA remainder	165	96	171	0	-102
Calne CA	1,605	1,130	1,019	0	-544
Chippenham	4,510	1,230	3,016	264	264
Chippenham CA remainder	580	419	86	75	75
Chippenham CA	5,090	1,649	3,102	339	339
Corsham	1,220	597	629	0	-6
Corsham CA remainder ¹⁴	175	285	96	0	-206
Corsham CA	1,395	882	724	0	-211

¹³ 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.

¹⁴ Totals for Corsham CA remainder and Corsham CA exclude any development at South West Chippenham which is classified as Chippenham Principal Settlement.

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	Indicative remaining requirement ('quoted')	Indicative remaining requirement ('actual delivery')
Malmesbury	885	657	385	0	-157
Malmesbury CA remainder	510	340	171	0	-1
Malmesbury CA	1,395	997	556	0	-158
Melksham and Bowerhill	2,240	1,445	1,113	0	-318
Melksham CA remainder ¹⁵	130	115	44	0	-29
Melksham CA	2,370	1,560	1,157	0	-347
Royal Wootton Bassett	1,070	1,014	140	0	-84
Royal Wootton Bassett and Cricklade CA remainder ¹⁶	385	305	177	0	-97
Royal Wootton Bassett and Cricklade CA	1,455	1,319	317	0	-181
Trowbridge	6,810	3,019	1,561	2,230	2,230
Trowbridge CA remainder	165	256	32	0	-123
Trowbridge CA	6,975	3,275	1,593	2,230	2,107
Warminster	1,920	615	970	335	335
Warminster CA remainder	140	91	33	16	16
Warminster CA	2,060	706	1,003	351	351
Westbury	1,500	940	851	0	-291
Westbury CA remainder	115	60	11	44	44
Westbury CA	1,615	1,000	862	44	-247
NORTH & WEST WILTSHIRE HMA	24,740	13,025	10,606	2,971	1,109
Amesbury, Bulford and Durrington	2,440	1,446	813	181	181
Amesbury CA remainder	345	176	73	96	96
Amesbury CA	2,785	1,622	885	278	278
Mere	235	123	143	0	-31

¹⁵ Totals for Melksham CA remainder and Melksham CA exclude any development at Land North of Green Lane as this is classified as Trowbridge Principal Settlement.

¹⁶ 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')
Mere CA remainder	50	42	7	1	1
Mere CA	285	165	150	1	-30
Salisbury	6,060	2,436	2,226	866	866
Wilton		321	211		
Wilton CA remainder	255	123	14	118	118
Salisbury and Wilton CAs	6,315	2,880	2,451	984	984
Downton	190	101	92	0	-3
Southern Wiltshire CA remainder ¹⁷	425	389	98	0	-62
Southern Wiltshire CA	615	490	191	0	-66
Tisbury	200	169	9	22	22
Tisbury CA remainder	220	62	16	142	142
Tisbury CA	420	231	24	165	165
SOUTH WILTSHIRE HMA	10,420	5,388	3,701	1,428	1,331
SWINDON (WITHIN WILTSHIRE)	900	622	328	0	-50
WILTSHIRE	42,000	22,659	16,946	4,569	2,396

4.4 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.

4.5 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

¹⁷ 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.

approach set out in the policy, and allowing for proposals for sustainable development even where it would result in indicative requirements being exceeded.

- 4.6 The extent to which delivery to date has met indicative housing requirements has been factored into the site selection process for each area.
- 4.7 The confirmed position has resulted in a minor degree of movement in the completions, developable commitments, and indicative remaining requirement in most areas. This is to be expected where the estimated housing land supply position is later confirmed. However a number of areas have shown more significant movement.
- 4.8 At Tidworth & Ludgershall Market Towns there is greater certainty surrounding the strategic allocation at Drummond Park following the transfer of ownership to Homes England, and swifter build rate than originally anticipated under the previous developer. This has resulted in the residual requirement being achieved in 2017.
- 4.9 At Chippenham Principal Settlement delays in housing delivery at the two allocations in the Chippenham Site Allocations Plan and large sites at Hunters Moon and North Chippenham have resulted in fewer commitments to be delivered within the Plan period at the Principal Settlement.
- 4.10 At Trowbridge Principal Settlement issues related to the Habitats Regulations and subsequent mitigation strategy for the town have resulted in delays for the strategic allocation at Ashton Park. This has reduced the expected delivery at the Principal Settlement.
- 4.11 At Warminster Market Town progress on the strategic allocation by multiple housebuilders according to the delivery rate in the agreed masterplan has increased potential delivery during the current Plan period, resulting in a reduced residual requirement at the town.
- 4.12 At the Amesbury, Bulford & Durrington Market Town the housebuilder does not currently intend to develop the full quantum of development at the Kings Gate strategic allocation. This will reduce the overall housing delivery in that area.
- 4.13 At Salisbury Principal Settlement (incorporating Wilton Local Service Centre) the significant delay in progressing the Churchfields & Engine Sheds strategic allocation has resulted in a large reduction in delivery at the city during the Plan period.

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 estimated 2017 housing land supply in Topic Paper 3 that was used to inform the Plan were based on the latest Housing Land Supply Statement (update published March 2017) at the time. This included a number of sources of supply.
- 5.3 The confirmed 2017 housing land supply position is based on the 2017 Housing Land Supply Statement (March 2018). The sources of supply are the same with the addition of the proposed allocations in the Plan. The Council's windfall allowance is recalculated each year to take into account latest permissions and additional data on historic delivery on windfall sites.

Windfall allowance

- 5.4 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 2017 Housing Land Supply Statement.
- 5.5 The windfall allowance in Topic Paper 3 was calculated based on the 2016 housing land supply position (i.e. the position with 10 years remaining in the Plan period) and reduced to fall in line with the estimated 2017 position (i.e. with 9 years remaining in the Plan period.) The windfall allowance has now been recalculated against the confirmed 2017 position. The windfall allowance used for each HMA is shown in Table 5.1 below.

Table 5.1 Anticipated windfall allowance (April 2017 – March 2026)

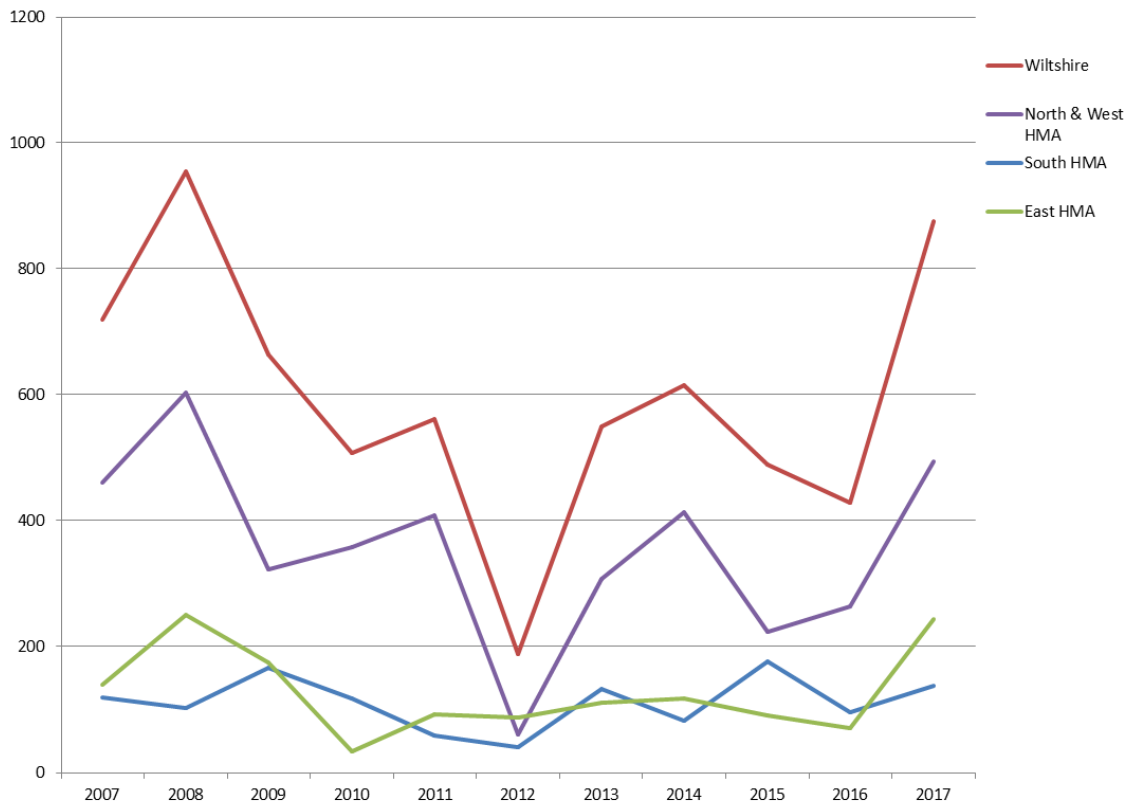
Housing Market Area (HMA)	Windfall allowance (April 2017 – March 2026)
East	823
N&W	2209
South	743

- 5.6 Completions data shows that during the Wiltshire Core Strategy period (2006-2017¹⁸) delivery of brownfield windfall sites have contributed **30%** of all housing completions. Figure 5.1 below¹⁹ 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.

¹⁸ Source: 2017 Housing Land Supply Statement (March 2018) - Appendix 5. This figure is based on non-allocated brownfield sites only.

¹⁹ Source: 2017 Housing Land Supply Statement (March 2018)

Windfall completions



5.7 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 Government policy and legislation

5.8 Topic Paper 3 set out a number of current legislative and policy changes which may affect the scope of the various sources of supply in the future. A number of these have been progressed through legislation or Government consultations, including the draft amendments to the National Planning Policy Framework (NPPF) being consulted upon March - May 2018, and accompanying Planning Practice Guidance. These include:

- the introduction of a formal Housing Delivery Test;
- substantial weight in decision-making to be given to re-use of suitable brownfield land within settlements;
- recognition of the importance of small site development, ensuring at least 20% of sites identified for housing are of half a hectare or less;
- the ability to fix a housing land supply position for 1 year through either an adopted plan or production of an Annual Position Statement.

Permission-in-principle

- 5.9 Permission-in-principle can be granted through a national or local development order on housing-led development, against sites on a register which meet a prescribed description, through an application to a Local Planning Authority, or allocated in a development plan.
- 5.10 The first instance of a prescribed description register is the Brownfield Land Register. Local Planning Authorities in England had to publish such a Part 1 register by 31 December 2017. The accompanying legislation allows Councils to grant permission-in-principle on sites in Part 2 of the register.
- 5.11 From 1 June 2018, developers will be able to seek permission-in-principle on small (<10 units) housing-led sites. These will also require Technical Details Consent to be sought and approved before development can take place.

Permitted development changes

- 5.12 Since the first amendments came into effect (May 2013) until the end of the monitoring period ending March 2017, prior approval has been granted for a total of **204** residential units on brownfield sites in Wiltshire. Since the pre-submission consultation of the Plan further amendments were implemented to extend permitted development rights to convert light industrial units to residential (October 2017).
- 5.13 A number of agricultural-to-residential approvals have also been granted and in a predominantly rural authority such as Wiltshire, opportunities are likely to continue. Further amendments to the Order were made in April 2018 to extend the allowable floor space and number of units that could be made from agricultural conversions.