



Wiltshire Housing Site Allocations Plan

Pre-submission
draft plan

Topic Paper 3
Housing Land Supply

June 2017

Wiltshire Council

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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⁽¹⁾ and subsequent Housing Land Supply Statements⁽²⁾ 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⁽³⁾, 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.

1 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)

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

3 National Planning Policy Framework paragraph 158

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.

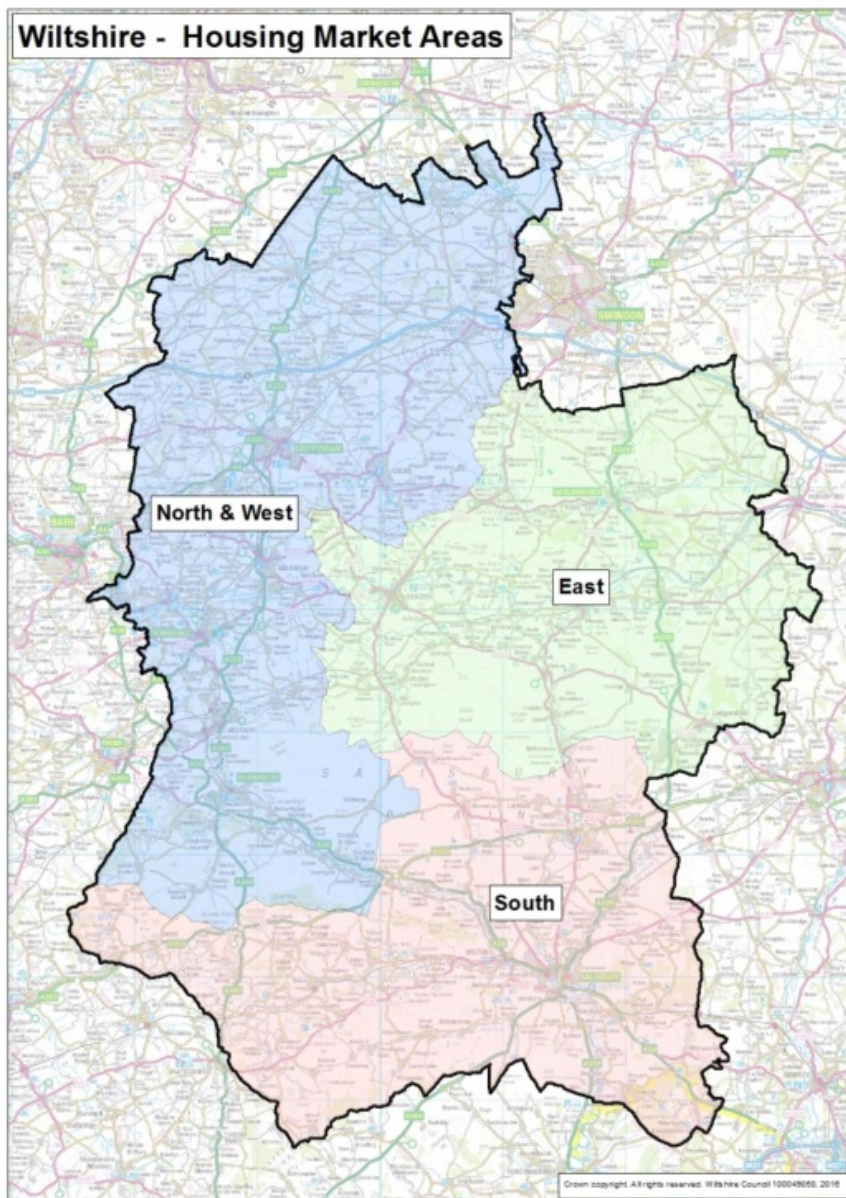
2.2 The purpose of this Topic Paper is to set out how the housing land supply position has evolved over the preparation of the Plan. It shows how housing delivery and provision of land supply has progressed over time in each of the Housing Market Areas (HMA) and Community Areas set out in the WCS. It 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 2.1 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 2.1 Map of Wiltshire Housing Market Areas



3 Housing land supply

- 3.1** In line with national policy⁽⁴⁾ and guidance⁽⁵⁾, 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.
- 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⁽⁶⁾ 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 3.1 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 3.1 Residual indicative requirements 2014-2017 by Area⁽⁷⁾

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

4 National Planning Policy Framework paragraph 47.

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

6 Sites of 10 or more housing units.

7 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
Pewsey CA	600	137	54	0	0
Tidworth and Ludgershall	1,750	82	121	88	74
Tidworth CA remainder	170	84	84	75	74
Tidworth CA	1,920	165	205	163	149
EAST WILTSHIRE HMA⁽⁸⁾	5,940	1,019	530	337	170
Bradford on Avon	595	17	64	0	0
Bradford on Avon CA remainder ⁽⁹⁾	185	76	57	61	0
Bradford on Avon CA ⁽⁹⁾	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

8 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.

9 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	Overall indicative requirement 2006-2026	Residual indicative requirement 2014	Residual indicative requirement 2015	Residual indicative requirement 2016	Residual indicative requirement 2017
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 ⁽¹⁰⁾	385	113	63	0	0
Royal Wootton Bassett and Cricklade CA ⁽¹⁰⁾	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
NORTH & WEST WILTSHIRE HMA⁽⁸⁾	24,740	3,603	2,489	1,967	571
Amesbury, Bulford and Durrington	2,440	69	155	72	73
Amesbury CA remainder	345	184	138	128	108

10 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
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 ⁽¹¹⁾	425	56	4	0	0
Southern Wiltshire CA ⁽¹¹⁾	615	177	118	0	0
Tisbury	200	39	26	24	25
Tisbury CA remainder	220	158	154	150	149
Tisbury CA	420	197	180	174	174
SOUTH WILTSHIRE HMA⁽⁸⁾	10,420	722	575	616	594
SWINDON (WITHIN WILTSHIRE)	900	1	0	0	0
WILTSHIRE⁽⁸⁾	42,000	5,346	3,544	2,870	1,285

3.6 As Table 3.1 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

11 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.

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)⁽¹²⁾.
- 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 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 3.2 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 3.2 Estimated 2016/2017 completions

Housing Market Area (HMA)	Completions from permissions granted up to 31 March 2016
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12 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.

East Wiltshire HMA	344
North & West Wiltshire HMA	847
South Wiltshire HMA	473
West of Swindon	74
Wiltshire	1738

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 3.3.

Table 3.3 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 ⁽¹³⁾
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
Wiltshire Total	42,000	21,707	N/A	14,928	N/A

3.23 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 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 3.4.

Table 3.4 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 develop a shared vision for their neighbourhood and

13 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.

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

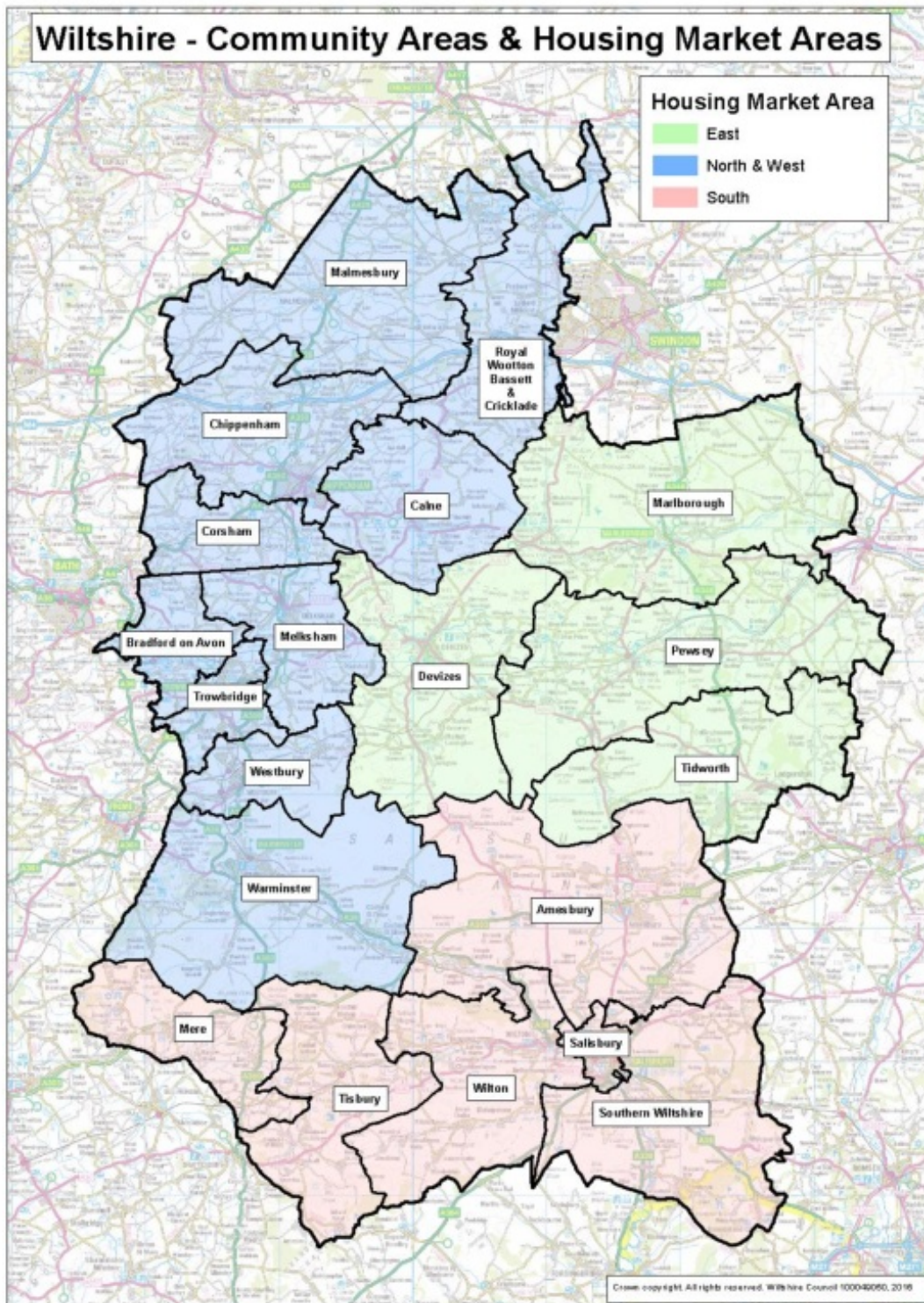
- 4.1** Core Policy 1 of the Wiltshire Core Strategy identifies and establishes a classification of settlements where sustainable development will take place over the plan period. Further amplification of the settlement hierarchy is then presented in Chapter 5 through the 'Area Strategies'.
- 4.2** The 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.

Table 4.1 Settlement strategy

Principal Settlements	Chippenham, Trowbridge and Salisbury
Market Towns	Amesbury (incorporating Bulford and Durrington), Bradford on Avon, Calne, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Tidworth and Ludgershall, Warminster, Westbury and Royal Wootton Bassett
Local Service Centres	Pewsey, Market Lavington, Cricklade, Tisbury, Mere, Downton and Wilton
Large and Small Villages	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 4.2 below. The Community Areas and their relationship with the Housing Market Areas are shown in Figure 4.1 below.

Figure 4.1 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 4.2 below shows the indicative requirement set out in the Wiltshire Core Strategy⁽¹⁴⁾ 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.

Table 4.2 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

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

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	Indicative remaining requirement ('quoted')	Indicative remaining requirement ('actual delivery')
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
EASTWILTSHIRE HMA⁽⁸⁾	5,940	3,497	2,273	301	170
Bradford on Avon	595	387	212	0	-4
Bradford on Avon CA remainder ⁽⁹⁾	185	119	72	0	-6
Bradford on Avon CA ⁽⁹⁾	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

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	Indicative remaining requirement ('quoted')	Indicative remaining requirement ('actual delivery')
Malmesbury CA	1,395	896	559	70	-60
Melksham and Bowerhill	2,240	1,370	1,221	0	-351
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 ⁽¹⁰⁾	385	315	150	0	-80
Royal Wootton Bassett and Cricklade CA ⁽¹⁰⁾	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
NORTH & WEST WILTSHIRE HMA⁽⁸⁾	24,740	12,603	11,566	2,769	571
Amesbury, Bulford and Durrington	2,440	1,311	1,056	73	73

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	Indicative remaining requirement ('quoted')	Indicative remaining requirement ('actual delivery')
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
Salisbury and Wilton CAs	6,315	2,711	3,302	302	302
Downton	190	88	105	0	-3
Southern Wiltshire CA remainder ⁽¹¹⁾	425	385	78	0	-38
Southern Wiltshire CA ⁽¹¹⁾	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
SOUTH WILTSHIRE HMA⁽⁸⁾	10,420	5,067	4,759	665	594
SWINDON (WITHIN WILTSHIRE)	900	540	410	0	-50
WILTSHIRE⁽⁸⁾	42,000	21,707	19,008	3,735	1,285

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 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 4.2. 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

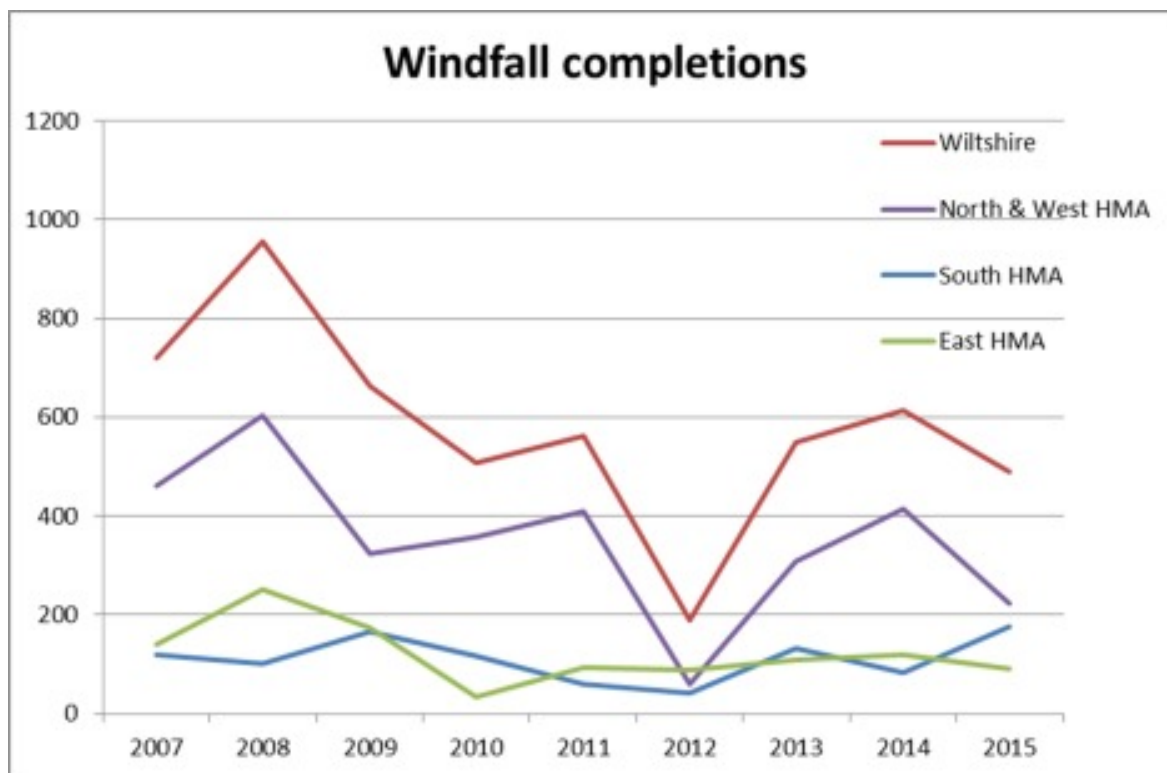
- 5.10** Windfall sites are defined in the Glossary of the NPPF as *“Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.”*
- 5.11** Paragraph 48 states that a windfall allowance 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 5.1 below.

Table 5.1 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⁽¹⁵⁾) delivery of brownfield windfall sites have contributed **29%** of all housing completions. Figure 5.1 below⁽¹⁶⁾ 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.

Figure 5.1 Windfall completions



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⁽¹⁷⁾ – 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.

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

16 Source: 2016 Housing Land Supply Statement (March 2017 update)

17 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⁽¹⁸⁾ 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⁽¹⁹⁾. 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.

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.

18 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.

19 Housing and Planning Bill 2015 and DCLG "Consultation on proposed changes to national planning policy" (December 2015)

- 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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For further information please visit the following website:

<http://www.wiltshire.gov.uk/wiltshsgsiteallocationsplan.htm>