



Working towards a Core Strategy for Wiltshire

Topic paper 2: Housing

Wiltshire Core Strategy
Consultation January 2012

This paper is one of 18 topic papers, listed below, which form part of the evidence base in support of the emerging Wiltshire Core Strategy. These topic papers have been produced in order to present a coordinated view of some of the main evidence that has been considered in drafting the emerging Core Strategy. It is hoped that this will make it easier to understand how we have reached our conclusions. The papers are all available from the council website:

Topic Paper 1: Climate Change

Topic Paper 2: Housing

Topic Paper 3: Settlement Strategy

Topic Paper 4: Rural Signposting Tool

Topic Paper 5: Natural Environment

Topic Paper 6: Retail

Topic Paper 7: Economy

Topic Paper 8: Infrastructure and Planning Obligations

Topic Paper 9: Built and Historic Environment

Topic Paper 10: Transport

Topic Paper 11: Green Infrastructure

Topic Paper 12: Site Selection Process

Topic Paper 13: Military Issues

Topic Paper 14: Building Resilient Communities

Topic Paper 15: Housing Requirement Technical Paper

Topic Paper 16: Gypsy and Travellers

Contents

- 1 Executive Summary
- 2 Introduction
- 3 Policy and Regulatory Framework
- 4 Links to Other Strategies
- 5 Evidence
- 6 Challenges, Opportunities and Outcomes
 - 6.1 Challenge H1 – Scale of housing
 - 6.2 Challenge H2 – Distributing housing
 - 6.3 Challenge H3 – Providing sufficient land
 - 6.4 Challenge H4 – Effective Use of Land
 - 6.5 Challenge H5 – Efficient Use of Land
 - 6.6 Challenge H6 - Mix and balanced communities
 - 6.7 Challenge H7 – Affordable Housing
- 7 Emerging policy and government initiatives
- 8 Collaborative Working
- 9 Bibliography and references
- 10 Glossary

1 Executive Summary

- 1.1 This topic paper sets out background information and research undertaken by the council to examine some of the key housing issues which have emerged from local studies, national and regional guidance, as well as preliminary views of stakeholders in some key areas.
- 1.2 In Wiltshire the local housing market is unbalanced. There are too few homes available which our local communities can afford¹. Often these shortages are more keenly felt in smaller rural communities which mean people cannot live where they work or where they grew up. A shortage of homes at the right price and in the right place has an impact upon Wiltshire in several ways. It can affect the social health and well being of households who are forced to live in homes which are too small, in poor condition and do not offer long term security and has an effect on the economy and sustainability of communities.
- 1.3 A number of key messages and issues have been drawn from the policy and regulatory review, collation of evidence and priorities identified within our communities (chapters 2, 3 and 4). This paper focuses on the following challenges:
1. Scale of housing
 2. Distributing housing
 3. Providing sufficient land
 4. Effective use of land
 5. Mixed and balanced communities
 6. Affordable housing
- 1.4 Chapter 6 identifies the key evidence relating to these challenges and sets out a series of policy options. All of the options have undergone sustainability assessment. This process has helped to inform the most appropriate policy response.
- 1.5 Along with the consultation responses summarised within chapter 6 the council has also worked with a wide range of stakeholders and organisations to help inform the housing topic paper including the Wiltshire and Swindon Housing Market Partnership, Wiltshire Registered Providers Development Forum and the Wiltshire Rural Investment Partnership.

¹ Wiltshire SHMA

2 Introduction

Wiltshire Core Strategy Evidence

- 2.1 This 'topic paper' provides background information and evidence to support the content of the Wiltshire Local Plan. The topic paper will undergo revision before the final policy wording is finalised for the submission core strategy which is anticipated towards the end of 2011.
- 2.2 This paper sets out the policy framework at international, national, regional and local levels. It collates the evidence from a variety of sources highlighting key messages and actions which policies need to respond to. The paper also identifies links to other strategies relevant to the topic area and demonstrates how the local plan can be complimentary, and facilitating, in delivering strategic outcomes. The options for addressing the challenges and achieving the outcomes identified are outlined within chapter 6.

Providing everyone with access to a decent, affordable home

- 2.3 The central assumption of the post 2004 planning system is that the process of sustainable place shaping requires a Local Development Framework (LDF) Core Strategy consistent with the Sustainable Community Strategy, and that the investment required for delivery reflects the priorities of the Local Strategic Partnership. The Core Strategy will set out a long term (15 - 20 years) strategy for the spatial development of Wiltshire. It should be flexible, deliverable, and capable of being monitored over its life and able to respond to changing circumstances.
- 2.4 Planning involves making decisions about the future of our cities, towns and countryside. This is vital to balance the desire to develop the areas where people live and work while ensuring the surrounding environment isn't negatively affected. It includes considering the sustainable needs of Wiltshire's future communities.
- 2.5 Ensuring the housing market offers enough decent homes at a price that people can afford is one of the council's highest priorities².

People, Places and Priorities: Wiltshire Community Plan 2011 - 2026 sets an objective to: 'address, as far as is possible the lack of affordable housing in Wiltshire by building more such housing, by bringing empty homes back into use and through any other means that may become available to meet housing need'.

- 2.6 In Wiltshire the local housing market is unbalanced. There are too few homes available that local communities can afford. Often these shortages are more keenly felt in smaller rural communities which mean people cannot live where they work or where they grew up. A shortage of homes at the right price and in the right place has an impact upon Wiltshire in several ways. It can affect the social health and well being of households who are forced to live in homes which are too small, in poor condition and do not offer long term security.

² <http://www.wiltshire.gov.uk/consultation-wiltshire-community-plan.pdf>

- 2.7 Not only that, but without a good quality housing stock the local economy is damaged. New jobs must be matched by new homes at the right price otherwise the workforce cannot be retained and there is a danger of encouraging more commuting and congestion on the roads. Only by delivering both homes and jobs can young people be retained in Wiltshire and with them the future potential of Wiltshire. But there is also the need for the right kind of homes for Wiltshire's aging population.
- 2.8 The council can use both housing and planning policies to promote the delivery of new affordable homes and improve the condition of the existing stock. This topic paper is intended to outline the evidence to develop a clear policy framework for all those involved in the delivery of housing through the planning system. It is hoped that this will help the council's partners and communities understand the need for a healthy and sustainable mix of housing throughout Wiltshire and ensure that everybody has the right to a decent and affordable home no matter who they are and what they earn.
- 2.9 It is critical that any new homes benefit new and existing communities. This means building the right homes in the right place at that right time. It is also critical that new developments provide the necessary services and infrastructure to create thriving communities, and that they are built to high environmental standards. It is vital that a significant proportion of new housing is affordable.
- 2.10 Housing demand nationally has increased for several reasons, including:
- greater number of single person households;
 - a population which is living for longer; and
 - increased levels of net immigration.

Wiltshire Core Strategy

- 2.11 In October 2009, the consultation document Wiltshire 2026 – Planning for Wiltshire's Future was published. This document was produced to inform the development of the Wiltshire Local Plan, which will set out a strategic framework of planning policies, to help guide development in Wiltshire up to 2026. Housing was identified as a key priority in this document.³
- 2.12 The consultation document identified a strategic objective - To Meet Wiltshire's Housing Needs. This was principally focused on delivering housing growth as set within the draft south west regional spatial strategy. The government has now stated its intention to abolish regional strategies. The Localism Bill published in December



Figure 1 - Wiltshire 2026 Consultation Tag Cloud

³<http://www.wiltshire.gov.uk/environmentandplanning/planninganddevelopment/planningpolicy/wiltshirecorestrategy/wiltshire2026.htm>

2010 contains the relevant clause providing the mechanism for its future revocation.

- 2.13 In light of the intention to formally abolish regional spatial strategies the council has sought to review the level of growth identified within the draft south west regional spatial strategy. Topic paper 17 (housing requirement technical paper) establishes the housing requirement for Wiltshire from 2006-2026.
- 2.14 In June 2011, the council produced a further consultation document to help inform the production of the core strategy. The consultation document provided an opportunity for people to have their say on new proposals for the level and location of new employment land and new homes across Wiltshire. In addition, the consultation document presented draft policies to ensure the sustainable delivery of new development in Wiltshire.
- 2.14 The Wiltshire Local Plan identifies the following strategic objective related to this topic paper:

Strategic objective 3: To provide everyone with access to a decent, affordable home.

This Strategy makes provision for 37,000 new homes in Wiltshire up to 2026. It sets out a plan for an appropriate mix of types, sizes and tenures, particularly to address affordable housing needs and will ensure a continuous supply of housing over the plan period that is aligned to job growth and the delivery of infrastructure.

Key outcomes

- The delivery of new homes in the most sustainable location and designed to respect the local character with the primary focus of new housing development will have been at Trowbridge, Chippenham and Salisbury and the market towns.
- More modest growth proportionate to the size of the settlement will have been delivered in smaller settlements, through neighbourhood plans and partnership working with the local communities and the benefits from the development of new homes will have been successfully captured for local communities,
- Development will have avoided encroachment on the Wiltshire Green Belt
- The Strategy has made significant progress towards addressing the shortfall in affordable homes across Wiltshire through ensuring a minimum of 40% of such homes have been delivered in all new schemes of 15 or more houses and 25% on developments of 5 to 14 houses.
- Land will have been used efficiently and all developments will have been low-carbon or zero-carbon
- A range of housing types and sizes will have been provided in order to help meet local needs for different groups of the population in a sustainable manner, including all new homes meet the Lifetime Homes Standards, to allow more of the ageing population to live in their own communities
- New pitches will have been provided for gypsies and travellers.
- Changes in the accommodation of military personnel will have enabled better integration

3 Policy and Regulatory Framework

- 3.1 This chapter identifies the key international, national and regional regulations and policies relating to this topic paper. It outlines requirements which will need to be fulfilled by the policies to be contained within the Wiltshire Core Strategy. The housing topic paper draws upon a variety of sources including those set out within the list below. There are other relevant plans and strategies that contribute to the evidence base. These are summarised in chapter 4 'links to other strategies' (page 18).

Key plans and guidance

Wiltshire Council Strategies and Plans National Guidance:

- Wiltshire Council – First year plan 2009-10 Securing the future 2005
- Sustainable Community Strategy for Wiltshire 2011 - 2026
- Planning for a sustainable future: White Paper (2007)
- Local Agreement for Wiltshire (LAW) 2008 Planning Policy Statements and Guidance
- Wiltshire Local Transport Plan (LTP) 2006-2011
- By Design – Urban design in the planning system: towards better practice (2000)
- Homes for the Future: more affordable, more sustainable (2007)
- Wiltshire Minerals and Waste LDF
- Community Area Plans
- Safer Places – The Planning System and Crime Prevention (2004)
- Wiltshire Council Sustainability Appraisal / SEA 2009
- Strong and prosperous communities: The Local Government White Paper (2006)
- Trowbridge, Chippenham and Salisbury Visions
- Draft Economic Development Strategy (2010)
- Draft Housing Strategy (2011)
- Draft Climate Change Strategy (2010)
- Draft Wiltshire Council Environmental Policy (2010)
- People, Places and Promises: Wiltshire Community Plan 2011-2026
- Wiltshire and Swindon Structure Plan 2016
- Wiltshire and Swindon Waste Development Control Policies DPD 2026 (2009)
- Draft Wiltshire and Swindon Waste Site Allocations DPD (2010)
- Former District Council Local Plans
- South Wiltshire Core Strategy Submission Document
- West Wiltshire Leisure and Recreation DPD (2009)

Other Local Strategies and Plans Regional Guidance:

- A sustainable future for the South West 2002
- Wiltshire Biodiversity Action Plan 2008
- South West Biodiversity Action Plan (1997)

- South West Biodiversity Implementation Plan (2004)
- Cotswold Water Park Biodiversity Action Plan 2007-2016
- South West Regional Skills Action Plan 2007-2010
- River Avon SAC Conservation Strategy (2003)

Plans of Neighbouring Authorities:

- A Climate Change Action Plan for the South West 2008-2010
- Bath & North East Somerset Council Local Plan
- Regional Renewable Energy Strategy for Plan October 2007
- Cotswold District Local Plan October 2007
- Wiltshire Renewable Energy Action Plan (2005)
- Mendip District Local Plan 2011
- Swindon Borough Local Plan 2011
- Avebury World Heritage Site Management Plan (1998)
- Test Valley Local Plan 2006
- Stonehenge World Heritage Site Management Plan (2009)
- Cotswold AONB Management Plan 2008-2013
- Cranborne Chase & West Wiltshire Downs AONB Management Plan 2004-09
- North Wessex Downs AONB Management Plan (2004)
- Trowbridge Urban Design Framework/Transforming Trowbridge (2008)

Government guidance

- 3.2 The Department for Communities and Local Government is the government department responsible for developing government housing policy in England. The government has stated that "...a growing and an ageing population necessitates building more homes, including affordable ones, and for existing homes to be managed more efficiently."⁴
- 3.3 The government has stated its intention to create economic conditions to allow more individuals to take responsibility for meeting their own and their families' housing needs whether they wish to buy or rent. Most people aspire to own their own home and the government wants to support people with that aspiration as long as they can sustain homeownership. In order to help achieve this, the government has outlined four key objectives relating to housing⁵:

Increasing the number of houses available to buy and rent including affordable homes

The government will return decision-making powers on housing and planning to local communities, and in its drive for localism it will allow them to protect the character of their neighbourhoods. Local people will determine where best to build the new homes and the local facilities they know are necessary to make their communities successful.

⁴ <http://www.communities.gov.uk/housing/about/>

⁵ <http://www.communities.gov.uk/housing/about/>

Powerful financial incentives will mean that local people will see the benefit in building new homes and we will continue to invest in affordable homes.

It is recognised that the private rented sector meets a wide range of housing needs, contributes to greater labour market mobility and is increasingly the tenure of choice for the young. The private rented sector is already governed by a well established legal framework and we will not introduce any further regulation.

The problem of homes lying empty while people have nowhere to live will also be addressed.

Improving the flexibility of social housing (increasing mobility and choice) and promoting homeownership

The government will make sure that public investment in social housing is properly targeted at the most in need. Building more affordable housing is necessary but we will also make it easier for social tenants to move for work or if their needs change, their family grows or their children leave home.

The aim of policy will be to increase the efficiency and flexibility of the social housing sector, while giving more power to tenants. Decentralising power in this way is essential to the creation of the Big Society.

The Home Information Packs have been removed that made it more expensive to put homes on the market and will continue to support schemes like the right to buy and low cost home ownership.

Protecting the vulnerable and disadvantaged tackling homelessness and supporting people to stay in their homes

The government is committed to protecting the most vulnerable and will work in partnership with local authorities, charities and other organisations, to tackle homelessness and end rough sleeping.

We will make sure that the Supporting People programme gives local authorities the flexibility to best help vulnerable people to live independently.

We are also helping people who are in danger of repossession because they cannot meet their mortgage repayments.

Making sure that homes are of high quality and sustainable

We support communities in their desire to take the lead in shaping new developments in their area and their wish to see higher standards of design and sustainability.

We will make sure that homes meet the standards necessary to support commitments to cut carbon emissions and that people can reduce their impact on the environment.

We will reform council housing financing so that local authorities have control over how they improve the quality of the homes they own and the service they offer their tenants.

Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA)

- 3.4 Sustainability appraisal is a tool that helps in the achievement of sustainable development, through appraising the social, environmental and economic effects of a plan from the outset; it is integral to the plan making process. It performs a key role in providing a sound evidence base for planning documents and forms an integrated part of the Local Development Framework (LDF) process.
- 3.5 Sustainability appraisal became mandatory for development plans under the Planning and Compulsory Purchase Act 2004. It incorporates an environmental assessment in accordance with the requirements of European Directive 2001/42/EC, which is commonly known as the Strategic Environmental Assessment (SEA) directive.
- 3.6 The options identified within chapter 6 of this topic paper (page 35), for addressing the challenges identified, have been tested against the council's sustainability appraisal toolkit⁶.

Habitats Regulation Assessment (HRA)

- 3.7 The council is required under Articles 6(3) and (4) of the Habitats Directive to assess the potential effects of its policies on European Sites which lie within and outside the authority.
- 3.8 European sites are a part of the planning process. Where appropriate, proposals and policies within the Wiltshire Core Strategy will undergo HRA assessment.

National Planning Policy

- 3.9 Government guidance on topics such as employment, retail, rural areas, heritage and the environment will influence the type and distribution of new housing. Policies contained within the Wiltshire Core Strategy will need to take account of this guidance in responding to local need and circumstance.
- 3.10 The key national policy sources that inform this topic paper are set out below:
- PPS1 Delivering Sustainable Development;
 - PPS3 Housing; and
 - PPS7 Sustainable Development in Rural Areas.

⁶<http://www.wiltshire.gov.uk/environmentandplanning/planninganddevelopment/planningpolicy/ldfsustainabilityappraisal.htm>

Emerging National Policy

Draft National Planning Policy Framework (NPPF)⁷

3.11 The Government has recently published the draft National Planning Policy Framework (NPPF) for consultation. This sets out the Government's economic, environmental and social planning policies for England and will replace the existing national planning policy guidance and statements. The intention is for this new framework to be less complex and more accessible. The public consultation closed on the 17th October 2011. The planning policy guidance and statements remain in place until the final NPPF is published but the proposals in the draft NPPF must be taken account. The relevant sections are covered under the themes identified in the PPS's below.

Planning Policy Statement 1 (PPS1): Delivering Sustainable Development (DCLG 2005)

3.12 PPS1⁸ seeks to promote development that creates socially inclusive communities, including suitable mixes of housing. Plan policies should:

- ensure that the impact of development on the social fabric of communities is considered and taken into account;
- seek to reduce social inequalities;
- address accessibility (both in terms of location and physical access) for all members of the community to jobs, health, housing, education, shops, leisure and community facilities; taking into account the needs of all the community, including particular requirements relating to age, sex, ethnic background, religion, disability or income;
- deliver safe, healthy and attractive places to live; and
- support the promotion of health and wellbeing by making provision for physical activity.

3.13 PPS1 also seeks to promote a strong, stable, and productive economy that brings jobs and prosperity for all. This includes the provision of sufficient, good quality, new homes (including an appropriate mix of housing and adequate levels of affordable housing) in suitable locations, whether through new development or the conversion of existing buildings. The aim should be to ensure that everyone has the opportunity of a decent home, in locations that reduce the need to travel.

Planning Policy Statement 3 (PPS3): Housing (DCLG 2006)

3.14 A primary government objective of PPS3⁹ is to ensure that the planning system delivers a flexible and responsive supply of land. It sets out the national planning policy framework for delivering the government's housing objectives, and reflects the commitment to improving the affordability and supply of housing in all communities. From 1 April 2007 local planning authorities have been required to assess and

⁷ <http://www.communities.gov.uk/publications/planningandbuilding/draftframework>

⁸ <http://www.communities.gov.uk/publications/planningandbuilding/planningpolicystatement1>

⁹ <http://www.communities.gov.uk/publications/planningandbuilding/pps3housing>

demonstrate the extent to which existing plans fulfil the requirement to identify and maintain a rolling five year supply of deliverable land for housing (PPS3).

- 3.15 PPS3 seeks to ensure that everyone has the opportunity to live in a decent home that they can afford in a community in which they want to live.
- 3.16 To deliver this PPS3 outlines the following outcomes:
- High quality housing that is well designed and built to a high standard.
 - A mix of housing, both market and affordable, in terms of tenure and price.
 - A sufficient quality of housing taking into account need and demand and improving choice.
 - Housing developments in suitable locations.
 - A flexible, responsive supply of land that makes efficient and effective use of land, including the re-use of previously developed land.
- 3.17 These outcomes should be based on the following principles:
- Sustainable development.
 - Visionary and strategic approach.
 - Market responsiveness. (This includes having regard to housing market areas).
 - Collaborative working.
 - Evidence based policy approach. (This includes a Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA))
 - Outcome and delivery focus.
- 3.18 In the draft NPPF the Government's key housing objective is to increase significantly the delivery of new homes. Everyone should have the opportunity to live in high quality, well designed homes, which they can afford, in a community where they want to live this means:
- Increasing the supply of housing
 - Delivering a wide choice of high quality homes that people want and need
 - Widening opportunities for home ownership; and
 - Creating sustainable, inclusive and mixed communities, including through the regeneration and renewal of areas of poor housing
- Achieving high quality design
- 3.19 To facilitate the delivery of high quality development relevant guidance and standards should be used, such as design coding and the Code for Sustainable Homes¹⁰.
- Achieving a mix of housing
- 3.20 Local Planning Authorities should plan for a mix of housing based on the different types of households that are likely to require housing over the plan period, for

¹⁰ See Topic paper 10 built and historic environment

example, older people. The Strategic Housing Market Assessment will identify this need. Based on this evidence the core strategy should identify:

- The overall proportion of households that require market or affordable housing.
- The profile of household types requiring market housing.
- The size and type of affordable housing required.
- A mix of housing to include the requirements of specific groups such as Gypsies and Travellers. The requirements of Gypsies and Travellers are covered in a separate development plan document.
- A mix of housing on strategic sites which should reflect the proportions of households that require market and affordable housing and should achieve a mix of housing.
- A range of market housing, including low cost market housing.

Affordable housing

3.21 Affordable housing is defined as including social rented and intermediate housing provided to households whose needs are not met by the market.

3.22 Local planning policy should:

- Set an overall target for the amount of affordable housing to be provided. It should include an assessment of the economic viability of land for housing.
- Set separate targets for social rented and intermediate affordable housing.
- Specify the size and type of affordable housing in particular locations and specific sites if necessary.
- Set out the range of circumstances in which affordable housing will be required. The indicative minimum site size threshold is 15 dwellings but lower thresholds can be set where viable. (An assessment of economic viability of thresholds will be required)
- Set out an approach to seeking developer contribution to facilitate the provision of affordable housing.
- Consider a rural exception site policy for allocating and releasing sites solely for affordable housing in rural areas.

PPS3 outlines a minimum site size threshold of 15 units. Local planning authorities are also required to undertake an informed assessment of the economic viability of any thresholds and the proportions of affordable housing being proposed. In seeking developer contributions, the presumption is that affordable housing will be provided on the application site. However, where it can be robustly justified, off-site provision or a financial contribution in lieu of on-site provision may be acceptable.

Making effective use of existing housing stock

3.23 Local planning authorities should develop positive policies to identify and bring into residential use empty housing.

3.24 Similarly the draft NPPF requires local planning authorities to identify and bring back into use empty housing and buildings in line with empty homes strategies. It also

states that compulsory purchase powers should be used to acquire properties if appropriate.

Assessing an appropriate level of housing

- 3.25 The level of housing growth should be determined using a strategic evidence based approach.
- 3.26 It should take account of the following:
- Evidence of current and future levels of need and demand for housing and affordability. This should be based upon local and sub-regional evidence of need and demand in the SHMA, advice from the National Housing and Planning Advice Unit (NHPAU) (the NHPAU closed during 2010) and the latest published household projections and economic growth forecasts
 - Local and sub-regional evidence of the availability of suitable land for housing using the SHLAA and other relevant evidence.
 - The government's overall ambitions for affordability.
 - A sustainability appraisal of the implications including costs, benefits and risks of the development.
 - The impact of development on existing or planned infrastructure.
 - The level of overall housing provision, illustrated in a housing delivery trajectory, should be set.
- 3.27 The draft NPPF requires local planning authorities to have a clear understanding of housing requirements in their area. This includes producing a Strategic Housing Market Assessment and a Strategic Housing Land Availability Assessment.

Providing housing in suitable locations

- 3.28 Housing should be developed in suitable locations that offer a range of community facilities with good access to jobs, key services and infrastructure. Local policy should set out broad locations and specific sites for growth. (See topic paper 14 site selection process).

Effective use of land

- 3.29 Re-use should be made of land that has been previously developed. The national annual target is that 60% of new housing should be provided on previously developed land. Local policy should also include a previously developed land target and trajectory. Incentives should be used to encourage development of previously developed land.
- 3.30 PPS3 on housing also recognises that the conversion of existing housing stock plays a key role in the provision of housing and requires planning authorities to develop positive policies to identify and bring in to use empty housing.
- 3.31 The draft NPPF removes the national annual target of requiring 60% of development to be on previously developed land. It also removes the requirement for local planning authorities to set their own target.

Efficient use of land

- 3.32 Land should be used efficiently. Local planning authorities should develop housing density policies which will consider:
- The spatial vision and housing strategy.
 - The current and future level and capacity of infrastructure, services and facilities.
 - The desirability of using land efficiently and reducing, and adapting to, the impacts of climate change.
 - The current and future levels of accessibility.
 - The characteristics of the area, including mix of uses.
 - The aim to achieve high quality, well designed housing.
 - This can be a range of densities if preferable. (The national indicative minimum density of 30 dwellings per hectare is now deleted from paragraph 47).
- 3.33 Annex B of PPS3 defines net dwelling density as: "Including only those site areas which will be developed for housing and directly associated uses, including access roads within the site, private garden space, car parking areas, incidental open space, and landscaping and children's play areas".
- 3.34 In line with PPS3 the draft NPPF is flexible and requires local planning authorities to set out their own approach to housing density to reflect local circumstances.

Delivering a flexible supply of land for housing

- 3.35 The planning system should deliver a flexible, responsive supply of land. Local planning authorities should ensure there are policy and implementation strategies to ensure that sufficient, suitable land is available to meet housing and previously developed land delivery objectives.
- 3.36 Broad locations and specific sites should be identified that will allow continuous delivery of housing for 15 years from the date of adoption.
- 3.37 Using the SHLAA sufficient specific deliverable sites should be identified to deliver housing in the first 5 years. Deliverable sites are defined as available now, suitable and achievable.
- 3.38 It is also necessary to identify specific developable sites for years 6-10, and for 11-15 if possible.
- 3.39 If specific sites cannot be identified for years 11-15, broad areas of growth should be identified.
- 3.40 Developable sites are suitable and available to be developed at some point.
- 3.41 Maintaining a housing land supply remains a key requirement in the draft NPPF. It aims to boost housing land supply using a number of mechanisms:

- Using the evidence base to ensure Local Plans meet the requirements for market and affordable housing in each housing market area. This includes identifying key sites that are critical to delivering the housing strategy over the plan period.
- Identify and maintain a rolling supply of specific deliverable sites to provide five years worth of housing against housing requirements. The document also now requires at least an additional 20% to ensure choice and competition. This effectively means six years worth of deliverable sites are required.
- Identify specific developable sites or broad locations for growth for years 6-10 and if possible for years 11-15. This is now more flexible as initially specific sites also had to be identified for years 6-10.
- Not allow for windfall in the first 10 years.
- Illustrate housing delivery through a housing trajectory.

3.42 The proposed definition of a deliverable site is now clear that the development must be viable in that it will provide acceptable returns to a landowner and developer taking into account current values and infrastructure requirements.

Planning Policy Statement 7 (PPS7): Sustainable Development in

Rural Areas (DCLG 2004)

3.43 The government's objectives for rural areas are set out within PPS7¹¹. The Rural Areas policy statement outlines that some limited development in, or next to, rural settlements that are not designated as local service centres, can be appropriate in order to meet local business and community needs and to maintain the vitality of these communities. Rural housing requirements should be based upon an up to date assessment of local need. Policies should aim to sustain, enhance and, where appropriate, revitalise country towns and villages (including through the provision of affordable housing) to encourage strong, diverse economic activity, whilst maintaining local character and a high quality environment.

3.44 The draft NPPF proposes a more flexible approach to housing in rural areas. In regard to exception sites it now acknowledges that allowing some market housing could facilitate the provision of additional affordable housing to meet local needs and suggests local planning authorities take this into account. It does however still state that housing in rural areas should not be located in places distant from local services.

3.45 The same restrictions on isolated development in the open countryside remain.

Local Transport Plan

3.46 The government's 1998 White Paper on Transport¹², 'A New Deal for Transport: Better for Everyone', introduced the concept of Local Transport Plans (LTP) to steer the development of national transport policies at the local level. The Transport Act 2000 then made it a statutory requirement for local transport authorities to produce LTPs.

¹¹ <http://www.communities.gov.uk/publications/planningandbuilding/pps7>

¹² <http://www.dft.gov.uk/about/strategy/whitepapers/previous/anewdealfortransportbetterfo5695>

- 3.47 The Wiltshire LTP sets out the council's objectives, implementation plans and targets for transport in Wiltshire. Furthermore, as a document developed through partnership working and extensive consultation, the LTP also provides the framework for all other organisations with a direct or indirect involvement in transport in Wiltshire.
- 3.48 Wiltshire's first full LTP (LTP1)¹³, published in July 2000, covered the period 2001/02-2005/06. In each of these years the council produced an LTP Annual Progress Report (APR) which detailed delivery and spending on schemes, and measured progress towards targets. A LTP Delivery Report which reviewed the whole LTP1 period was produced in July 2006. The second Wiltshire LTP (LTP2) covering the period 2006/07 – 2010/11 was published in March 2006. The first formal progress report dealing with the LTP2 was produced in December 2008 (an informal progress report was published in July 2007). The third Wiltshire Local Transport Plan (LTP3) covers the period from March 2011 to March 2026.
- 3.49 The Wiltshire LTP has a number of objectives relating to housing including the need to ensure that housing is provided within the context of sustainable communities.

Wiltshire and Swindon Structure Plan

- 3.50 The Structure Plan provides a strategic policy framework for land-use planning, development and transport across the administrative areas of Wiltshire (incorporating Wiltshire County and Swindon Borough) up to 2016. This framework is used to inform the Wiltshire Local Development Framework.
- 3.51 The Wiltshire and Swindon Structure Plan 2016 is an alteration to the Wiltshire Structure Plan 2011. This means that the majority of policies have remained the same, with alterations to other policies to ensure the Plan is consistent with national and regional planning guidance to guide development across Wiltshire up to 2016.

Wiltshire and Swindon Minerals and Waste Policy

- 3.52 Wiltshire Council and Swindon Borough Council jointly prepare Minerals and Waste Development Plan Documents (DPDs), which cover the geographical areas of Wiltshire County and Swindon Borough.

South Wiltshire Core Strategy Submission Document

- 3.53 The South Wiltshire Core Strategy Development Plan Document (DPD) sets out the council's spatial vision, key objectives and overall principles for development in the area of the former Salisbury District Council.
- 3.54 The key objectives of the vision have been derived from an analysis of the former District's characteristics, a review of the former district and county council's own corporate plans and priorities (for example, the Sustainable Community Strategy) and national and regional planning guidance. At its heart is the delivery of viable and vibrant communities based on the principles of sustainability.

13

<http://www.wiltshire.gov.uk/council/howthecouncilworks/plansstrategiespolicies/transportpoliciesandstrategies/localtransportplan2.htm>

- 3.55 Strategic Objective 2 within the South Wiltshire Core Strategy Submission Document aims 'to provide everyone with access to a decent, affordable home'. In order to achieve this it sets out a plan for an appropriate mix of types, sizes and tenures, particularly in order to address affordable housing needs. It also identifies deliverable strategic sites to ensure there is a rolling five-year supply of housing.
- 3.56 The South Wiltshire Core Strategy submission document sets the following requirements for housing:
- 40% affordable housing on sites of 15 dwellings or more, and 25% affordable housing on sites of between 5 and 14 dwellings.
 - 34% of development to be on previously developed land.

West Wiltshire Leisure and Recreation Development Plan Document

- 3.57 The Leisure and Recreation Development Plan Document (DPD) has been prepared for the West Wiltshire District for the period to 2016 to provide additional recreation policies for the West Wiltshire area. The binding Inspector's report was received towards the end of 2008 and the DPD was adopted at a meeting of the Implementation Executive, the transitional decision making body for the new unitary authority, on 26 February 2009.
- 3.58 This DPD will be replaced by policies in new Wiltshire-wide DPDs when adopted, including policies within the Wiltshire Core Strategy.

4 Links to Other Strategies

- 4.1 Within Wiltshire there are significant opportunities to strengthen the environmental, social and economic well-being of the county. In order to do this Wiltshire must be well placed to meet current and future demands for housing and employment, whilst safeguarding and enhancing its rich environmental assets and ensuring that sustainable development is achieved. To achieve this, a number of documents have been produced which identify the key priorities, objectives, and outcomes for Wiltshire.
- 4.2 There are a number of other strategies which are particularly relevant in the process of formulating relevant policies to ensure that everyone has access to a decent affordable home.

Wiltshire Council Business Plan 2011-2015

- 4.3 The Wiltshire Council Business Plan sets out what the council will achieve between now and 2015. It highlights the council's business model for the next five to 10 years. The changes from where the council is now will be phased so that the first four years set the foundations to make the council as efficient as possible and equipped for the future.
- 4.4 The vision included within the business plan is 'to create stronger and more resilient communities'. This is all about people and places, fostering a sense of community

belonging and self-sufficiency where communities can solve problems locally with our support.

- 4.5 Invest in: housing - The Business Plan recognises the important role that Wiltshire Council has in tackling the housing issues across the county. It recognises that there is not enough affordable or high quality housing to meet current and future needs. The Business Plan identifies an ambition to enable the development of 450 affordable homes each year of which 250-350 additional new affordable homes for rent will be from the PFI scheme.

The Wiltshire Community Plan 2011-2026

- 4.6 The Wiltshire Community Plan 2011-2026¹⁴ 'People, places and promises' sets a clear vision for Wiltshire, alongside the priorities and objectives for the next 15 years. This outlines the overall strategic direction and long-term vision for the economic, social and environmental well-being of Wiltshire.
- 4.7 Contained within these priorities are set objectives, including:
- Reducing disadvantages and inequalities – A key priority is to ensure that Wiltshire is able to meet the needs of the growing older population. This includes addressing the lack of affordable housing, including social housing and shared ownership, by building new housing and bringing empty homes back into use.
 - Together, the Business Plan and Community Plan provide the overarching priorities and objectives for Wiltshire. The role of the Local Development Framework is to provide the planning principles in terms of the distribution and scale of growth for housing and employment, in order to deliver sustainable patterns of development, which in turn deliver economic growth whilst addressing, as far as possible, issues of housing affordability.

Energy Change and Opportunity Strategy 2011 – 2020

- 4.8 The 'Energy, Change and Opportunity (ECO) strategy'¹⁵ is a framework strategy which sets out the council's ambitions for reducing its carbon emissions as an organisation and preparing for unavoidable climate change. It links to other council strategies to ensure its objectives are embedded across the entire organisation. It will be supplemented by detailed action plans to set out more specifically how the council are going to deliver its climate change ambitions, including:
- Carbon Management Plan for the council's emissions
 - Climate Change Adaptation Plan for Wiltshire
 - Low Carbon Transition Plan for Wiltshire
 - Renewable Energy Action Plan for Wiltshire

¹⁴ <http://www.wiltshire.gov.uk/communityandliving/communityplan.htm>

¹⁵ <http://www.wiltshire.gov.uk/communityandliving/countryside/climatechange.htm>

- 4.9 This strategy sets out how Wiltshire as a council and a community can take action on climate change. Climate change requires everyone to work together to make adjustments to their lives, businesses and communities in order to secure a better future for all.
- 4.10 The strategy outlines a number of objectives relating to housing including the need to maximise the positive impacts of new developments on local jobs, shops, biodiversity and the transport network by:
- Providing a mixed range of building uses, on sites such as housing, places to work and shops.
 - Writing planning policies that strongly promote a wide range of sustainability issues.
 - Defining and implementing a set of biodiversity criteria that must be met by all new developments.
 - Requiring new developments to be well located and highly accessible, with good transport infrastructure. This could, for example, include charging points for alternative fuelled vehicles.
- 4.11 When meeting future housing and employment needs within the county, the council must ensure that the carbon footprint is minimised by:
- Maximising the opportunities for delivering decentralised and low carbon energy on large scale developments.
 - Developing positive policies that support large scale renewable energy installations where appropriate, which will be informed by the current exercise to map potential opportunities for renewable technologies within Wiltshire.
 - Ensuring that new developments achieve carbon neutral standards by 2016 (for residential property) and by 2019 (for commercial buildings).
 - Using the Building for Life checklist as a tool for designing sustainable settlements.
- 4.12 The strategy promotes innovative solutions to generate green energy in Wiltshire by:
- Working with the Centre for Sustainable Energy to pilot a resource pack for community groups on community-based renewable energy.
 - Using the Salisbury, Trowbridge and Chippenham Vision programmes as opportunities to identify urban renewable and low carbon solutions.
 - Ensuring that the planning process enables renewable technologies to be retrofitted to existing housing, including those in conservation areas and listed properties where possible.
- 4.13 The Strategy sets out that the design of new developments should be influenced so that they incorporate climate change adaptation principles, making communities more sustainable, by:
- Encouraging the use of passive design to reduce energy demand, or soft landscaping to provide shading during the summer.

- Retaining existing green spaces and encouraging provision within new developments.
- Vegetation and biodiversity can help address climate change by providing natural shading and cooling.

Wiltshire Council Draft Housing Strategy

4.14 The draft housing strategy¹⁶ complements and supports wider national and regional priorities, the council's Business Plan and the Community Strategy. The aims and priorities are based on working in partnership with a range of individuals and agencies, including tenants groups, and organisations in the public, voluntary and private sectors.

4.15 The draft vision of the housing strategy is:

'In partnership we will help to build a better future with safe and secure homes in strong and vibrant communities, where everyone should have a good quality of life and access to opportunities, choices and high quality services which are sustainable, accessible and meet people's needs, now and in the future.'

4.16 The key priority of the draft strategy which relates to this topic paper is:

'Meeting housing need: Increasing the supply of well-designed market and affordable housing that is appropriate for the city, town or village.'

Chippenham Vision

4.17 The Vision Board¹⁷ includes representatives from many organisations with a stake in Chippenham's future, such as the Area Board, the Town Council, ChAP, the Chippenham Borough Lands Charity, the Chamber of Commerce, the Civic Society, North Wilts Economic Partnership and the Wiltshire College.

The vision aims to:

(a) With expert help, define the needs of the town in terms of good retail (to stop the 'leakage' of shopping to other towns), land for employment, housing and leisure facilities.

(b) The Board is focusing on the three areas of the town centre that have land available for development – the Bath Road car park & Bridge Centre, Station Hill & Langley Park, and the Hygrade & Wessex Water area.

Transforming Trowbridge¹⁸

4.18 The aspiration is to raise the profile of Trowbridge to a level deserving of a county town coupled with the development potential of significant sites in the town centre to

¹⁶ http://consult.wiltshire.gov.uk/portal/housing/building_strong_foundations_-_the_housing_strategy_for_wiltshire_2011_-_2016_consultation

¹⁷ <http://www.thechippenhamvision.co.uk/about.aspx>

¹⁸ <http://www.transformingtrowbridge.org.uk/>

provide the impetus to move away from piecemeal, uncoordinated development towards a strategic and comprehensive approach to the regeneration of the town.

Trowbridge Urban Design Framework / Transforming Trowbridge (2008)

- 4.19 The Trowbridge urban design framework sets out a framework for the comprehensive regeneration of Trowbridge town centre to enable the town to fulfil its role as the county town for Wiltshire. The key objectives are to identify a sense of place in new developments, co-ordinate new developments, create a safe and attractive public realm, and identify suitable development.

Salisbury Vision

- 4.20 The Salisbury Vision¹⁹ provides a framework for co-ordinating and achieving the sustainable regeneration of five priority areas – the Maltings and central car park, Churchfields Industrial Estate, Salisbury Guildhall, the Market Place, and the Southampton Road. Considerable improvements will also be made to the city's streets and other public areas through the development and implementation of a comprehensive public realm strategy.

Wiltshire Biodiversity Action Plan (2008)

- 4.21 The Wiltshire Biodiversity Action Plan(BAP)²⁰ states that development can affect all habitats in the county. The Local Development Frameworks (LDFs) produced by Local Planning Authorities (LPAs), provide many opportunities to protect and enhance biodiversity, together with policy and legislation such as the biodiversity duty set out under the Natural Environment and Rural Communities (NERC) Act, 2006.
- 4.22 The design of major developments, if done sympathetically, can work towards many BAP targets through incorporating measures to enhance biodiversity and contributing to networks of multifunctional green space, known as green infrastructure. Bearing this in mind, opportunities arise to further many BAP targets and actions through planning gain, which uses developer contributions for purposes including biodiversity enhancement.
- 4.23 Planning and Policy Statement 9 (PPS9) requires of Local Planning Authorities that "...Plan policies and planning decisions should aim to maintain, and enhance, restore or add to biodiversity ... interests". The broad aim of this section of the Generic Action Plan is to ensure this is put into practice.

¹⁹ <http://www.salisburyvision.co.uk/>

²⁰ <http://www.biodiversitywiltshire.org.uk/>

5 Evidence

- 5.1 Having access to affordable, quality homes is important for social and economic well-being and the health of children and families. It can also play an important role in promoting economic growth; low rates of house building lead to a restriction of labour mobility which can, as a result, constrain productivity. Wiltshire needs to respond to increasing demand and the need to supply a responsive housing stock. The foundation of housing policy lies in the concept of sustainable development and the creation of communities where people want to live and work. Sustainable design is also becoming more important because the way our homes are built and managed determines the impact we have on the environment.
- 5.2 This section provides a summary of evidence reviewed and a snapshot of Wiltshire in terms of housing, outlining key characteristics, trends, issues and opportunities. It also gives an overview of the infrastructure, climate change considerations and a summary of stakeholder and community involvement related to housing.
- 5.3 The main sources of information used are:
- Census 2001 (Office of National Statistics)
 - Sub-national population projections 2008
 - Land registry England and Wales
 - Wiltshire Council housing register
 - Communities and Local Government live tables
 - Wiltshire Strategic Housing Market Assessment (SHMA)

Population

- 5.4 One of the underlying components of housing demand is demographic change and it is important that we are able to forecast what is likely to happen in the future in order that provision for new housing can be properly planned. Wiltshire's population is projected to increase by 65,208 over the period 2006-2026.

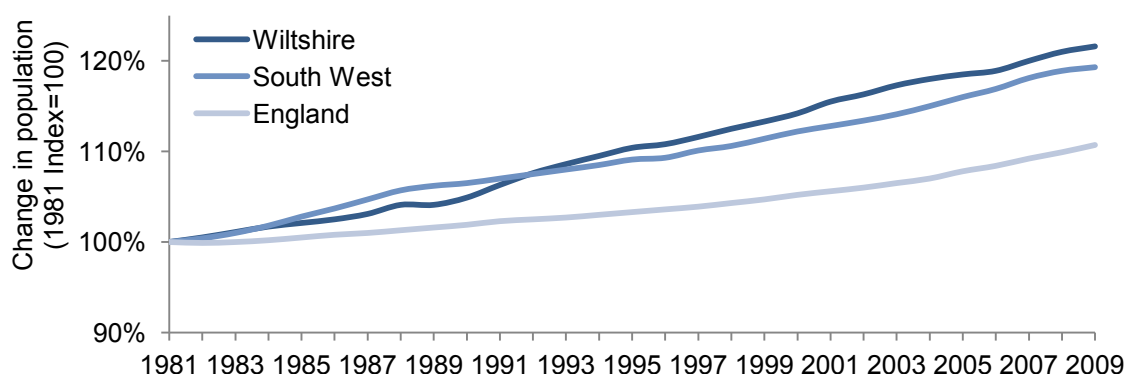


Figure 2 - Population change in Wiltshire (1981-2009) Source: ONS mid-year population estimates 1981-2009

5.5 The changes projected within Wiltshire's population will have implications for the delivery of housing in terms of size, type and tenure. Age structure projections also highlight significant changes, especially amongst the elderly population. Within the 20-29 age group (the age group from which most new households are formed), numbers are expected to increase by 4,944 by 2026. The over 65 age group shows an overall increase of 57,047 by 2026. By 2026 the composition of the older age group will have changed dramatically. There will be a higher proportion of the older age groups, including the over 85's, and double the number of older disabled people. One in five children born today can expect to live to 100 years old²¹. Population forecasts will vary depending on the variables and scenarios applied. Nevertheless, the forecasts give an important indication of trends which policies need to respond to.

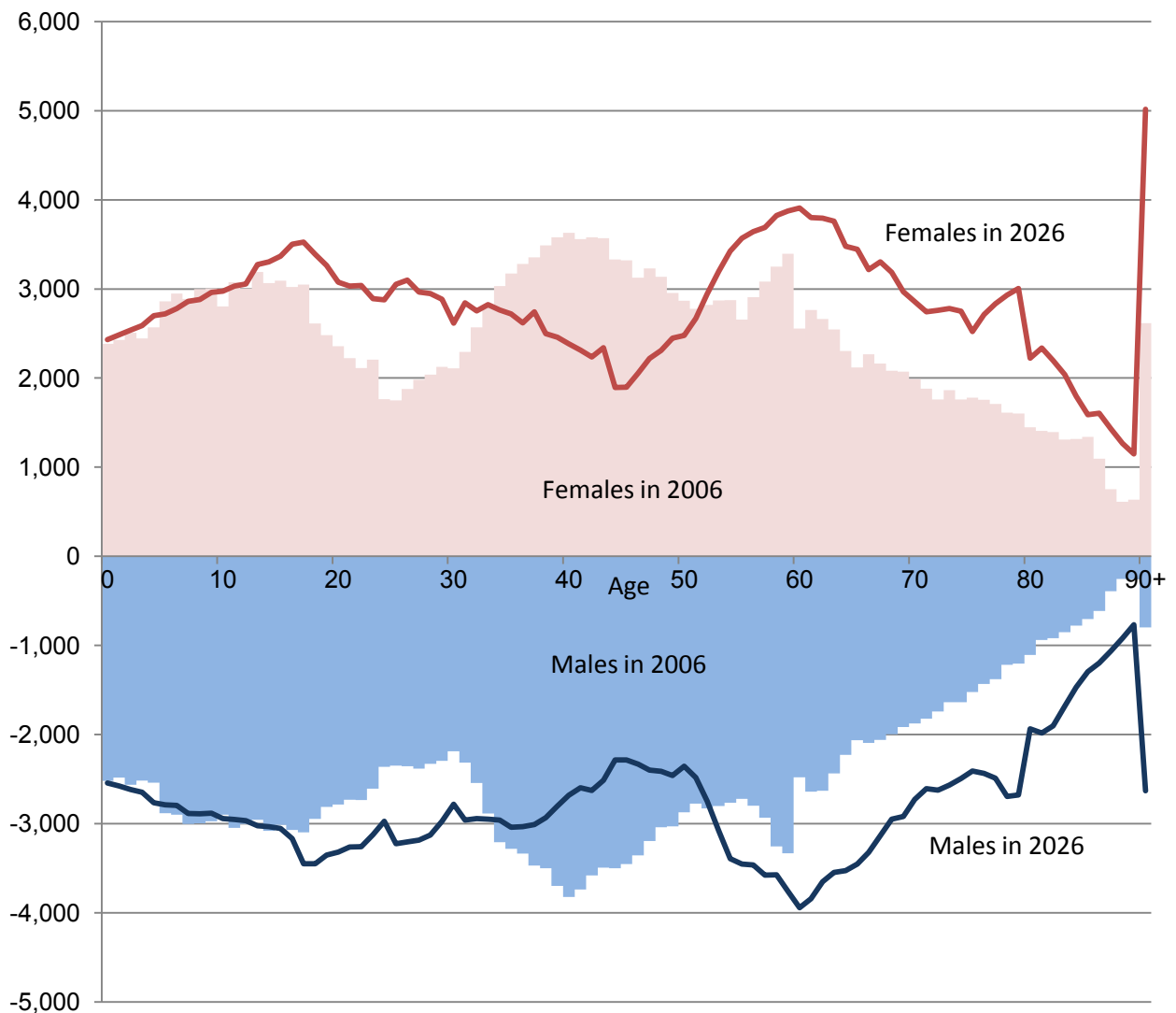


Figure 3 - Wiltshire Council emerging population projections

²¹ http://www.lifetimehomes.org.uk/data/files/Reports/lthltn_dclgstrategy.pdf

Incomes and Affordability

- 5.6 Access to the owner occupied market is heavily restricted by rising house prices with increases exceeding local income inflation. The relationship between local incomes and the realistic supply of the cheapest stock available exacerbates the affordability problem within Wiltshire. In 2010 the (mean) gross wage of people living in Wiltshire was £24,844²².

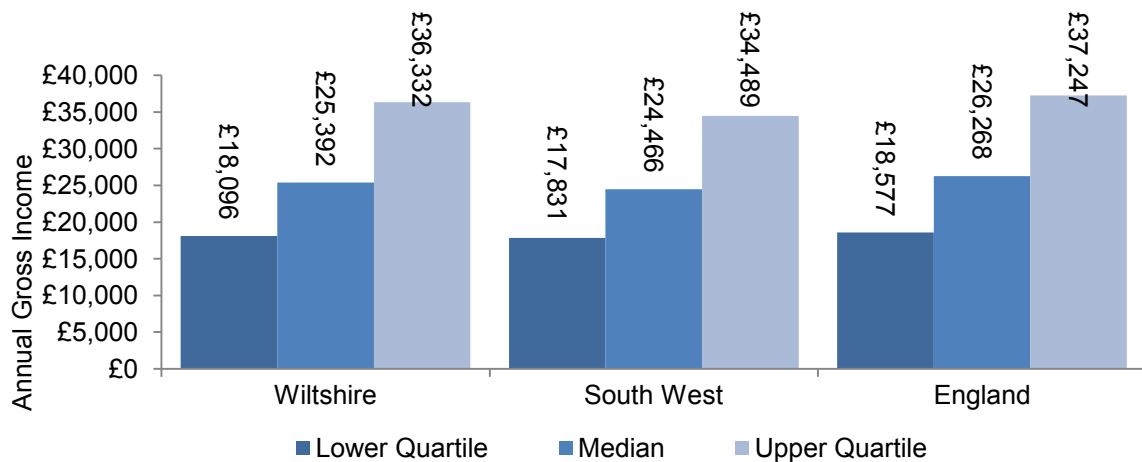


Figure 4 - Annual gross income of full-time employees (2010) - Source: ONS Annual Survey of Hours and Earnings (2010)

- 5.7 In Wiltshire there has been a gradual deterioration in affordability, determined by the ratio of lower quartile house price to lower quartile income. According to government figures²³, the 2010 affordability index for Wiltshire was 8.57 - higher than the Southwest and England average. This is illustrated in table 1. If a multiplier of 3.5 is assumed in order to secure a mortgage, then based on the average income a resident would be able to afford £86,954.

Table 1 - Affordability Index - Source: Ratio of lower quartile house price to lower quartile earnings, 2002-2010²⁴.

	2002	2003	2004	2005	2006	2007	2008	2009	2010
England	4.72	5.23	6.28	6.82	7.15	7.25	6.97	6.28	6.69
South-West	6.37	7.11	8.18	8.58	8.51	8.94	8.75	7.63	8.17
Wiltshire	7.19	8.03	8.84	8.50	8.76	9.16	8.58	8.09	8.57

- 5.8 Income is a key driver of demand and is a core factor in the assessment of the scale of housing need and in determining affordability in local housing markets. The average house price for all properties during July 2010 was £223,043²⁵. Since 2003 the average price of all properties has risen by 33%. Entry level stock, terraced

²² ONS Annual Survey of Hours and Earnings (2010)

²³ <http://www.communities.gov.uk/housing/housingresearch/housingstatistics/housingstatisticsby/housingmarket/livatables/housepriceindex/>

²⁴ HM Land Registry House Prices 2010 / ONS Annual Survey of Hours & Earnings 2010 (576).

²⁵ <http://www.landregistry.gov.uk/>

properties have increased by 30% and flats / maisonettes have increased by 32% between 2003 and 2010.

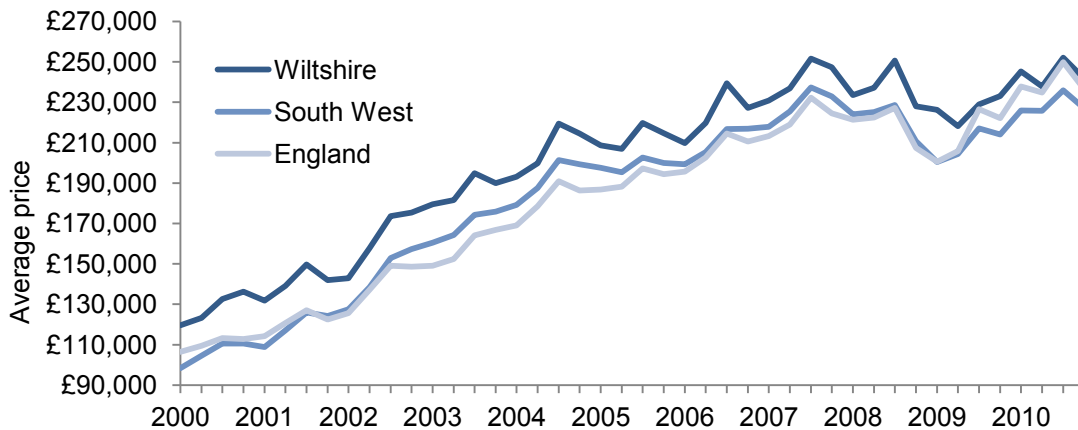


Figure 5 - Land Registry price changes 2000-2010 (mean) Source: Land Registry 2000-2010

Table 2 - Average property selling prices Wiltshire. Source: Provided by the Land Registry of England and Wales.

Property Type	July 2003	July 2010	Change
Detached	£259,102	£307,556	+19%
Semi-detached	£150,845	£193,966	+29%
Terraced	£125,896	£163,525	+30%
Flat	£99,509	£131,097	+32%
All properties	£167,905	£223,043	+33%

Tenure Profile

5.9 Analysis of 2001 Census data reveals that 72.0% of households in the county were owner-occupiers, slightly lower than the regional equivalent but higher than the national figure. Around a sixth of households resided in the social rented sector, higher than the South West but lower than the national average. The private rented sector makes up a smaller proportion of households than both the regional and national level. This could be related to the larger proportion of households in other tenures.

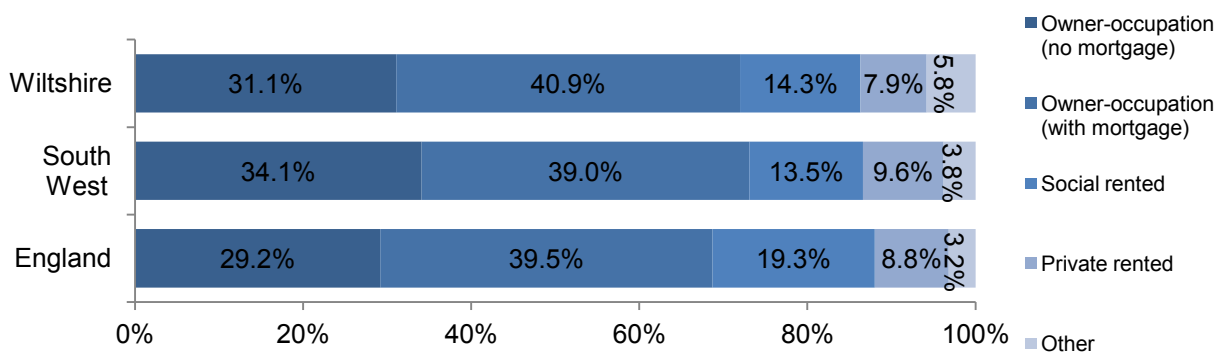


Figure 6 - Tenure (2001) Source: Census 2001

5.10 The maps in Figure 7 show the proportion of households living in each of the three broad tenure groups (owner-occupation, social rent and private rent) by ward. There are notable variations within the County; levels of owner-occupation are generally high in all areas except Salisbury and Chippenham, the far south west of the County has the highest proportion of private rented accommodation and there are small proportions of social rented housing across Salisbury Plain and higher densities of this tenure in some urban areas.

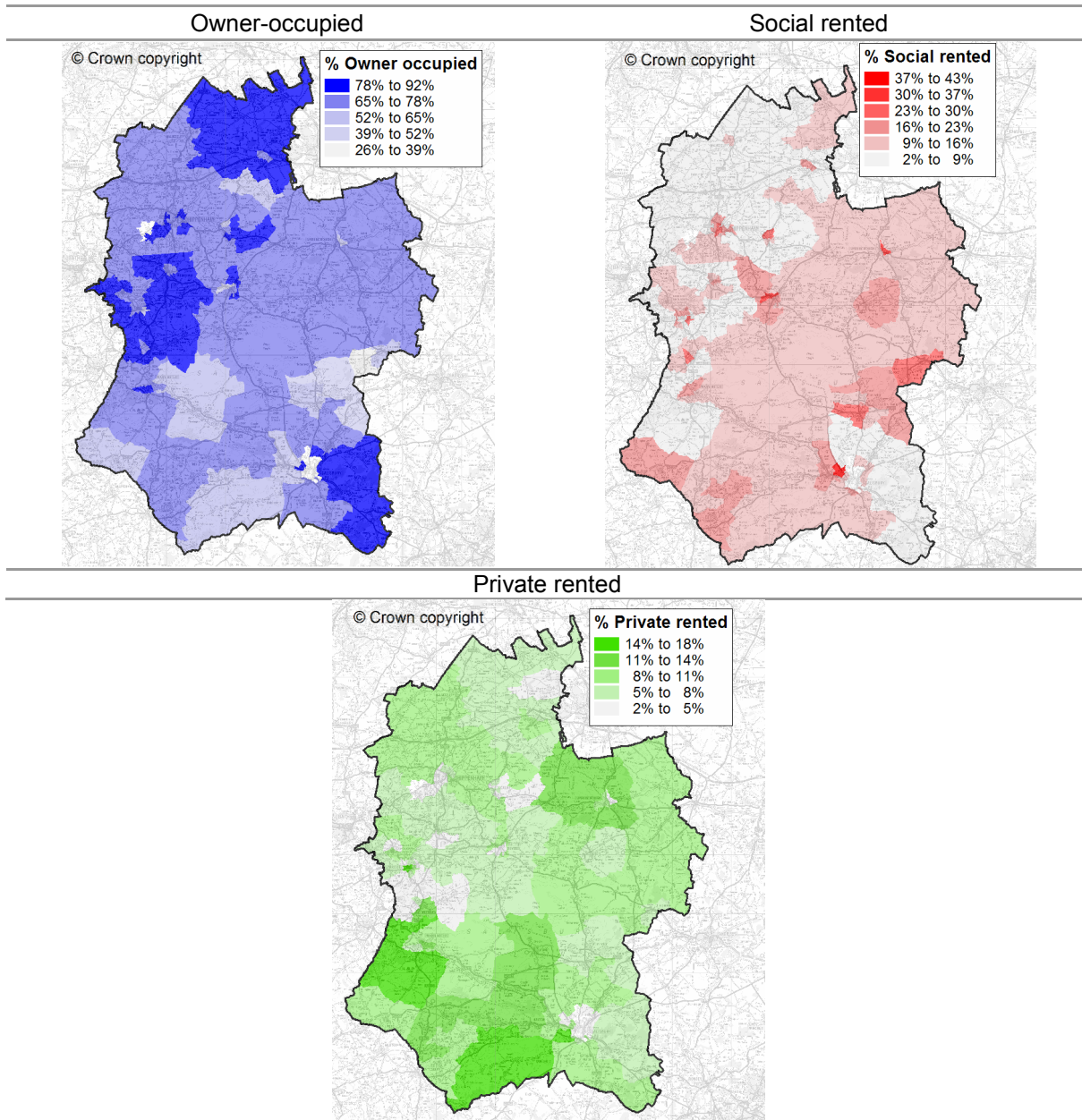


Figure 7 - Tenure by ward Source: Census 2001

Employment

- 5.11 Measured by the most recent Annual Business Inquiry (ABI)²⁶, there were 179,000 employee jobs in Wiltshire in 2008. Despite a fall in the number of jobs in 1999 (Figure 8), in Wiltshire the number of jobs has increased by over a tenth (12.6%) since 1998. The South West as a whole experienced greater growth of 14.8% whilst for Great Britain the figure was 9.5%.

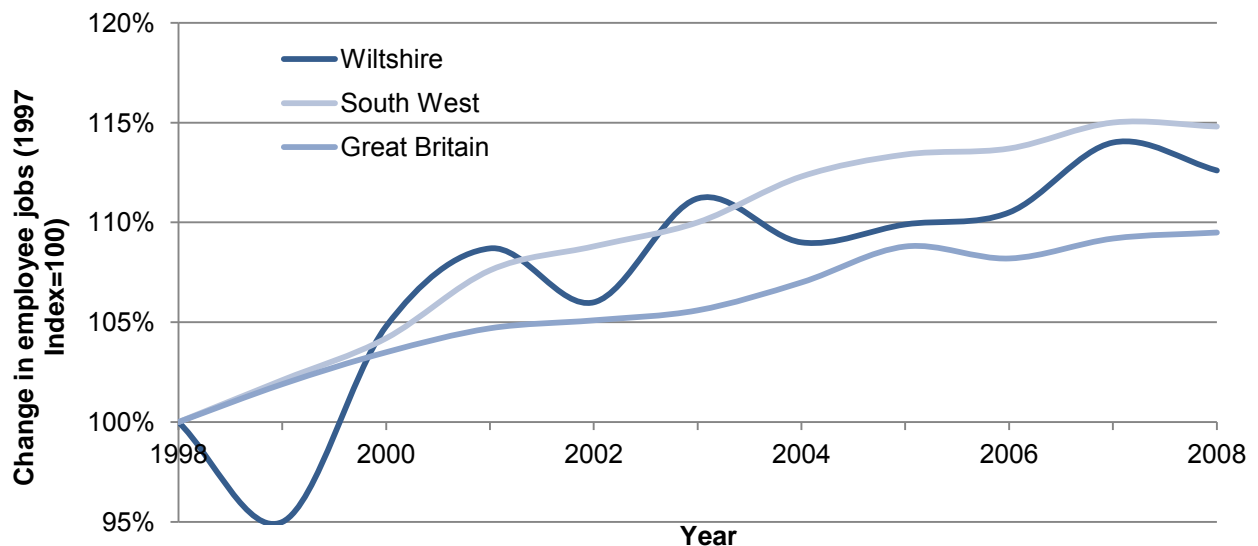


Figure 8 - Indexed employment growth in Wiltshire (1997-2007) Source: ONS Annual Business Inquiry Employee Analysis 2008

- 5.12 In terms of employment, the 'public admin, education & health' sector is by far the largest sector of employment, providing 28.5% of all jobs available in the County in 2008; similar to the levels in the South West and Great Britain as a whole (data is from ONS's Annual Business Inquiry). 'Distribution, hotels and restaurants' account for 25.0% of employee jobs in the County, the same as the regional figure. The 'Finance, IT and other business sectors' are proportionally smaller in the County and region at around 19% of employee jobs compared to 22% in Great Britain as a whole.

Income

- 5.13 Income has a crucial effect on the level of choice a household has in their future accommodation. The median earned income for full-time employed Wiltshire residents in 2010 was £25,392 (see figure 4, according to the ONS Annual Survey of Hours and Earnings (ASHE)²⁷-higher than the South West median (at £24,466) but lower than the median for England as a whole (£26,268). The figure below shows that this is also the case when lower and upper quartile incomes are considered.

²⁶ <http://www.statistics.gov.uk/abs/>

²⁷ <http://www.statistics.gov.uk/statbase/product.asp?vlnk=13101>

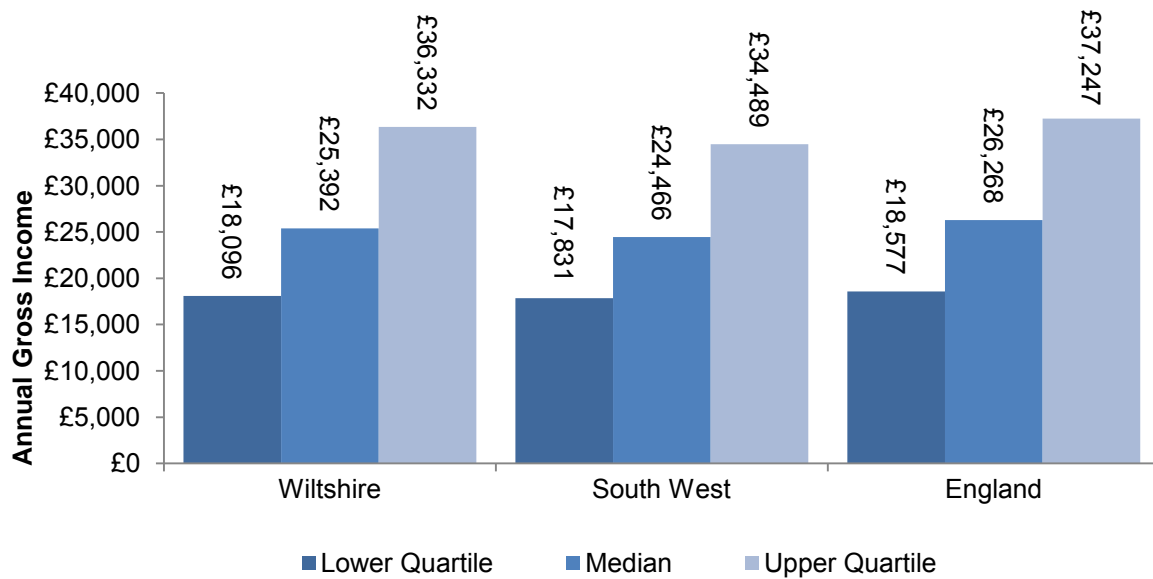


Figure 9 - Annual gross income of full-time employees (2010) Source: ONS Annual Survey of Hours and Earnings (2010)

Housing Need

- 5.14 A large amount of information is published nationally outlining the need to build more homes. However, whilst this information is useful, the authority also undertakes extensive local research to ensure policies and strategies meet local need and circumstance. This evidence draws upon Strategic Housing Market Assessments (SHMAs) and other sources of information such as the authority's housing register.
- 5.15 PPS3 (Housing) requires local authorities to undertake Strategic Housing Market Assessments as part of the evidence base to inform Local Development Framework Core Strategies and the development of planning and housing policy.
- 5.16 A SHMA is not intended to give definitive estimates of housing need and demand, but to act as a basis for developing housing and planning policies by considering the characteristics of the housing market, how key factors work together, and the probable scale of change in housing need and demand.
- 5.17 A summary of the SHMA and its findings can be found in Annex A.

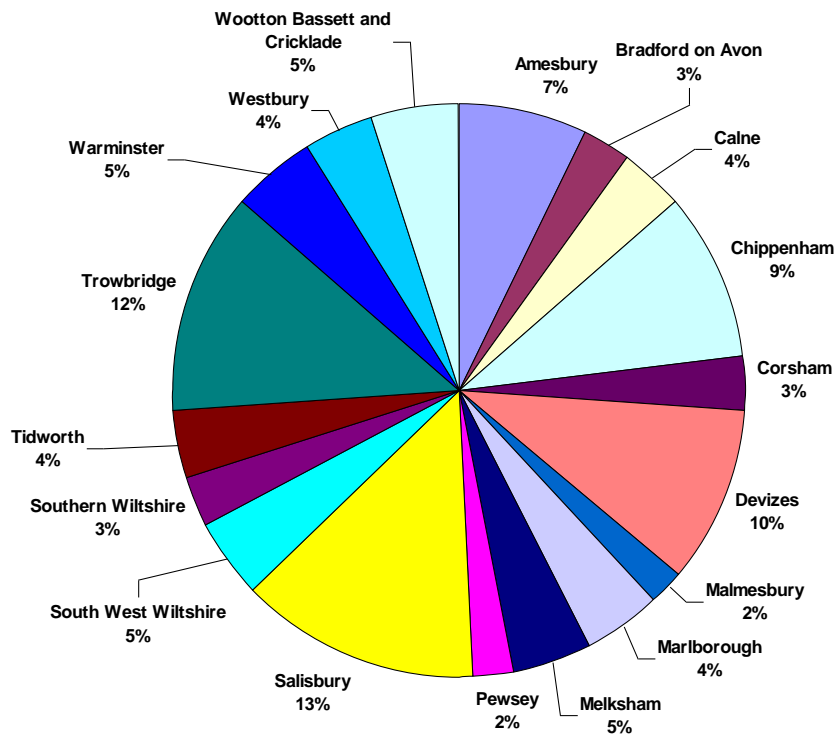


Figure 10 - Numbers on housing register - Source: Wiltshire Council

5.18 At the time of writing the council had 13,800²⁸ households on the housing register. There are significant variations in the geography of demand of households included on the housing register see figure 10. The community areas with the highest demand for housing are Salisbury (1839, 13%), Trowbridge (1723, 12%), Devizes (1369, 10%) and Chippenham (1304, 9%), reflecting the larger population of these urban areas.

Housing supply

5.19 Analysis of the current stock of housing allows a broad assessment of the range and condition of properties currently within the County. The council's 2007/2008 Housing Strategy Statistical Appendix (HSSA) records that there are 200,488 dwellings in the County. Table 11(below) presents a summary of key information on the Wiltshire housing stock compared with regional and national equivalents.

²⁸ Housing register March 2011

Dwelling stock profile in Wiltshire			
	Wiltshire	South West	England
10 year change in total stock (2000 – 2010)*	8.5%	9.6%	7.8%
Proportion of dwellings that are flats**	10.0%	16.1%	19.3%
Proportion of dwellings which contain 5 or more rooms**	74.2%	70.0%	67.4%
Proportion of dwellings in lowest Council Tax Band (A)***	12.1%	17.5%	25.2%
Vacancy rate in the private sector*	2.7%	2.5%	3.2%
Proportion of household spaces in shared dwellings**	0.2%	0.3%	0.4%

Table 11 - Sources: *HSSA/HIP data (2000 & 2010), ** 2001 Census, *** CLG (2009)

- 5.20 HSSA data indicates that the overall increase in the housing stock in Wiltshire over the period 2000 to 2010 was lower than experienced regionally but higher than the national rate.
- 5.21 According to the 2001 Census, only a tenth of the County's dwellings are flats, lower than the regional average and about half the national level. Over a third of dwellings (35.8%) were detached and almost another third were semi-detached dwellings.
- 5.22 The 2001 Census contains information about the size of properties (in terms of the number of rooms excluding bathrooms, toilets and hallways). The data shows that dwellings in the County tend to have more rooms than was the case regionally: almost three quarters (74.2%) of dwellings had five or more rooms.

Area	2005/2006	2006/2007	2007/2008	2008/2009	Total
East Wiltshire	229	333	597	402	1561
North Wiltshire	872	849	840	544	3105
South Wiltshire	435	373	460	485	1753
West Wiltshire	596	513	771	436	2316
Total	2132	2068	2668	1867	8735

Figure 12 - Net dwellings constructed - Wiltshire housing land availability assessment

	2005/6	2006/7	2007/8	2008/9	2009/10
Kennet	55	61	182	140	
North Wiltshire	157	137	165	179	
Salisbury	60	45	88	121	
West Wiltshire	72	145	133	136	
Total	344	388	568	576	501

Figure 13 - Additional affordable dwellings provided²⁹

29

<http://www.communities.gov.uk/housing/housingresearch/housingstatistics/housingstatisticsby/localauthorityhousing/dataforms>

House Types and Tenure

- 5.23 According to the 2001 census 53% of homes within Wiltshire are semi-detached or terraced, detached properties accounted for 36% of total household spaces.

Table 3 - Accommodation type (unshared) - household spaces – Source: 2001 Census

Accommodation type (unshared) - household spaces	Wiltshire	
	Number	%
Detached	65,805	36
Semi-detached	57,276	31
Terraced	40,445	22
Flat, maisonette or apartment	18,397	10
Caravan or other mobile or temporary structure	1,522	1
All household spaces unshared	183,445	100

Housing Design and Density

- 5.24 Climate change considerations are bringing an increasing concern for the design and density of development.
- 5.25 There are many aspects to the issues of sustainable design and construction, including the layout, orientation and density of development, and the incorporation of high standards of insulation, water efficiency measures, sustainable drainage techniques, on-site renewable energy production and waste minimisation and management.
- 5.26 The minimum density requirements set within PPS3 have been removed. Developments need to take due regard to local context and character. Further information of this topic is contained within topic paper 10 'built and historic environment'.

Climate Change Considerations

- 5.27 Sustainable design is becoming an increasingly important tool for tackling carbon dioxide emissions and reducing fuel poverty. Standards for new houses are set out in the Code for Sustainable Homes, with an aspiration that all new dwellings will be "zero carbon" by 2016. The code is currently voluntary, but it is likely to be mandatory in the future. Further information on this topic is contained within topic paper 1 'climate change'.

Wiltshire 2026 – Planning For Wiltshire's Future (October 2009)

- 5.28 Wiltshire 2026³⁰ was an important stage in the production of the Wiltshire Core Strategy. Following the consultation the council produced a detailed report into the consultation which is available from the council website³¹.

³⁰

<http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/wiltshirecorestrategy/wiltshire2026.htm>

- 5.29 Wiltshire 2026 drew together the local plans review work initiated by the former district councils to help inform the creation of a new overarching single plan for Wiltshire. However, Wiltshire 2026 did not address issues in South Wiltshire because this work had already been done as part of the preparation for the South Wiltshire Core Strategy, which will ultimately be merged with the Wiltshire Core Strategy.
- 5.30 The consultation included 4,000 direct consultees, including community groups, 17 exhibitions across Wiltshire and 15 workshops. In addition, meetings were held with town and parish councils and documents were provided to elected Wiltshire councillors. A total of 2,192 individual responses were received from 678 respondents.
- 5.31 Respondents felt that the vision demonstrated sound underlying principles; however, it was felt that it should be more locally distinct rather than just delivering central government objectives. Although some people expressed concern over the level of growth set regionally, many people accepted that development could be a means of securing wider objectives with benefit to the community as a whole. Balance in development was also seen as important, with the need to equate housing growth with employment opportunities and infrastructure delivery was seen as a key concern, especially in terms of its timely delivery at the point of development, rather than later on in the plan period.
- 5.32 Responses made to strategic objective three, 'meeting Wiltshire's housing needs', supported the objective in principle, but concerns were raised about the details of how this will be achieved. In particular, there are concerns about the level of development proposed in towns and villages other than Chippenham, Trowbridge and Salisbury.
- 5.33 Whilst the provision of affordable housing was supported in principle, providing 3,000 new affordable houses per year is considered to be unachievable. More information was requested on targets and delivery mechanisms for affordable housing and addressing the housing needs of the elderly population.
- 5.34 Responses which relate to each specific challenge are summarised further within chapter 6 of this topic paper.

6 Challenges, Opportunities and Outcomes

6.1 A number of key messages and issues have been drawn from the policy and regulatory review, collation of evidence and priorities identified within our communities (chapters 2, 3 and 4). The table below illustrates the key messages and issues relating to housing to be addressed by the core strategy.

Viable delivery co-ordinated with necessary infrastructure provision	Housing requirements	<p>Challenge H1 Delivering a <u>scale of housing</u> growth to satisfy local needs, meet the housing demands of a growing population, and support economic growth, whilst conserving and enhancing the unique character of the natural and built environment.</p>
		<p>Challenge H2 <u>Distributing housing</u> growth strategically to support sustainable communities, enhance the role and function of settlements, promote the diversification of the rural economy and to build on opportunities provided by transport corridors and networks.</p>
		<p>Challenge H3 Providing <u>sufficient land</u> and sites for housing development, giving a suitable choice of development locations and opportunities to deliver homes which can offer good quality of life with access to jobs, services, open space and infrastructure.</p>
	Housing development	<p>Challenge H4 Achieving an <u>appropriate balance</u> between the development of previously developed land and greenfield sites, and ensuring the <u>effective use</u> of existing housing stock by identifying and bringing back into use empty homes and buildings.</p>
		<p>Challenge H5 Ensuring the <u>efficient use</u> of land, and high quality of building design, layout and construction, to achieve high standards of sustainability in new development, including appropriate <u>densities</u>.</p>
	Housing need	<p>Challenge H6 Developing <u>mixed and balanced communities</u> and bringing forward developments that provide an appropriate mix of housing in terms of size, type, tenure and affordability to meet local needs, including <u>specialist needs</u>.</p>
		<p>Challenge H7 Meeting the need for <u>affordable housing</u> within new developments and elsewhere through 'exception sites'.</p>

6.1 Challenge H1 – Scale of housing

Delivering a scale of housing growth to satisfy local needs, meet the housing demands of a growing population, and support economic growth, whilst conserving and enhancing the unique character of the natural and built environment.

6.1.1 Please see topic paper 17 (housing requirement technical paper), topic paper 3 (settlement strategy) and topic paper 10 (built and historic environment).

6.2 Challenge H2 – Distributing housing

Distributing housing growth strategically to support sustainable communities, enhance the role and function of settlements, promote the diversification of the rural economy and to build on opportunities provided by transport corridors and networks.

6.2.1 Please see topic paper 17 (housing requirement technical paper), topic paper 3 (settlement strategy).

6.3 Challenge H3 – Providing sufficient land

Providing sufficient land and sites for housing development, giving a suitable choice of development locations and opportunities to deliver homes which can offer good quality of life with access to jobs, services, open space and infrastructure.

Policy Requirements

6.3.1 Planning Policy Statement 3 (PPS3) requires a flexible supply of land for housing to be delivered across the plan period. This includes identifying broad locations and specific sites in Local Development Documents that enable the continuous delivery of housing for at least 15 years from the date of adoption of the plan. Within this requirement local planning authorities must identify:

- Specific deliverable sites to deliver the first 5 years of the housing requirement. Deliverable sites are available now, suitable for development and achievable within 5 years.
- Specific developable sites for the next 6-10 years and if possible 11-15 years. Developable sites are suitable for development and have a reasonable prospect of being available within 6-15 years.

6.3.2 Within this requirement, strategic sites must be identified that are critical to the delivery of the housing strategy over the plan period. These sites must be identified through the Strategic Housing Land Availability Assessment or other relevant evidence.

- 6.3.3 Planning Policy Statement 12 (PPS12) only allows sites that are strategic in nature to be allocated in the core strategy. Currently PPS12 only allows sites to be allocated in a Development Plan Document.
- 6.3.4 It is proposed that maintaining a flexible housing land supply remains a key element of the draft NPPF. It proposes to require a 5 year supply of housing land supply plus 20% to enable choice and competition in housing development. This effectively means 6 years worth of deliverable sites should be provided within the housing land supply.

Sources of Supply

- 6.3.4 In planning for new homes a number of sources of housing supply have been identified to meet these requirements and ensure a continuous supply of housing across the plan period. This will be constantly updated through the annual monitoring of housing development.
- 6.3.4 The sources of housing supply are:
- Homes that are already built or already planned. This includes developments that have been completed between 2006 and 2010, and developable permitted sites at April 2010³². These are sites with planning permission and extant Local Plan allocations that are deliverable.
 - Strategic housing and mixed use allocations that are considered central to the overall strategy for Wiltshire. A site selection process has been followed to identify strategic sites for inclusion in the Wiltshire Core Strategy. Further information on the proposed strategic sites and site selection process can be found in Topic Paper 14 – site selection process.
 - Small site allocations in the main settlements. As the Core Strategy can only allocate sites that are truly strategic in nature there is a remaining requirement that may take the form of small scale site allocations that will be identified through a site allocations development plan document (prepared in close consultation with local communities), through community led Neighbourhood Plans if appropriate or through some other planning mechanism.
 - Regeneration projects including The Chippenham Vision, Transforming Trowbridge and The Salisbury Vision.
 - Windfall sites. These are small brownfield unallocated sites of less than 10 dwellings. Planning Policy Statement 3 (PPS3) stipulates that windfall can only contribute towards the supply after the first 10 years.

6.3.5 Further information on the breakdown of the sources of supply can be found in table ES1: Proposed housing requirements including completions, commitments and proposed strategic sites (net additional homes), within topic paper 17 – housing requirement technical paper. A housing trajectory displaying this information can also be found in topic paper 17 – housing requirement technical paper.

³² In line with PPS3 to be considered developable, sites should be in a suitable location for housing development, and there should be a reasonable prospect that the site is available for development and could be developed at the point envisaged.

6.4 Challenge H4 – Effective Use of Land

Achieving an appropriate balance between the development of previously developed land and greenfield sites, and ensuring the effective use of existing housing stock by identifying and bringing back into use empty homes and buildings.

- 6.4.1 Using land effectively is a key component of planning for housing development. The definition of using land effectively includes two elements:
- 6.4.2 The first is the importance of using land effectively by reusing suitably located Previously Developed Land (PDL) or brownfield land. Prioritising the reuse of redundant or vacant PDL ensures as little greenfield land as possible is used and makes the best use of land within built up areas.
- 6.4.3 The prioritisation of development on PDL does not mean there is a presumption of housing development on any PDL site. It is still necessary to balance the prioritisation of developing PDL with other sustainability objectives such as environmental issues or accessibility.
- 6.4.4 It is also important that the prioritisation of development on PDL does not limit the delivery of housing development and the strategic objectives. Development on PDL is more likely to involve remediation and lead-in times can be longer. The balance between development on PDL and development on greenfield land is therefore important.
- 6.4.5 PDL is defined by PPS3 as land that was or is occupied by a permanent structure. It includes the curtilage of that structure. The full definition can be found in Annex B of PPS3. Recent changes to PPS3 have now removed private residential gardens, parks and allotments from this definition.

National Policy Considerations

- 6.4.6 PPS3 requires land to be used effectively by reusing PDL. Local planning authorities must set a target and trajectory for the proportion of development on PDL.
- 6.4.7 The annual national target is for 60% of development to be on PDL. Regionally the abolished draft regional spatial strategy proposed a target of 50% for the South West.
- 6.4.8 The targets set by the former district Local Plans and the draft South Wiltshire Core Strategy range from 34-50%.
- 6.4.9 PPS3 also requires local planning authorities to develop positive policies to identify and bring into residential use empty housing.
- 6.4.10 The draft NPFF proposes to remove the national target for 60% of development to be on previously developed land and also removes the requirement to produce a locally

derived target for development on previously developed land. The requirement to prioritise is therefore potentially effectively removed.

Evidence

Housing Land Availability Report

6.4.11 Evidence on past trends on the balance between the development of PDL and greenfield land can be found in the annual Housing Land Availability Report for Wiltshire.

6.4.12 Over the period 1996-2010, of 27,878 completions and hard commitments for Wiltshire as a whole, 52% were on PDL and 48% were on greenfield land (See Table 4).

Table 4 - Housing completions and hard commitments (net) 1996-2010 for the former district areas. Source: Wiltshire Council

	East Wiltshire	North Wiltshire	South Wiltshire	West Wiltshire	Total
Number of dwellings and proportion on PDL	3041 (67%)	4721 (56%)	2734 (48%)	3996 (44%)	14492 (52%)
Number of dwellings and proportion on greenfield land	1472 (33%)	3752 (44%)	2979 (52%)	5183 (56%)	13386 (48%)

6.4.13 Within the county there are variations by place between the balance of development on PDL and greenfield land. This is shown on the tables 5 and 6 (below) which show the proportion of development on PDL and greenfield land in the community areas and in the principal towns of Chippenham, Trowbridge and Salisbury.

Table 5 - Balance of development between previously developed and greenfield land for completions and hard commitments 2007-2010 by community area. Source: Wiltshire Council

Community area	Number of dwellings and proportion on PDL	Number of dwellings and proportion on greenfield land
Amesbury	133 (19%)	559 (81%)
Bradford on Avon	119 (29%)	349 (74%)
Calne	122 (26%)	349 (74%)
Chippenham	809 (91%)	81 (9%)
Corsham	494 (97%)	14 (3%)
Devizes	709 (75%)	236 (25%)
Malmesbury	437 (86%)	74 (14%)
Marlborough	173 (89%)	21 (11%)
Melksham	308 (92%)	25 (8%)

Community area	Number of dwellings and proportion on PDL	Number of dwellings and proportion on greenfield land
Mere	44 (40%)	65 (60%)
Salisbury	327 (94%)	20 (6%)
Southern Wiltshire	153 (31%)	333 (69%)
Tisbury	72 (74%)	25 (26%)
Trowbridge	435 (55%)	349 (45%)
Warminster	190 (84%)	35 (16%)
Westbury	261 (52%)	237 (48%)
Wilton	167 (84%)	31 (16%)
Wootton Bassett	234 (91%)	22 (9%)

Table 6 - Housing completions and hard commitments 1996-2010 for Chippenham, Trowbridge and Salisbury Source: Wiltshire Council.

Town	Chippenham	Trowbridge	Salisbury
Number of dwellings and proportion on PDL	1450 (55%)	1314 (31%)	897 (38%)
Number of dwellings and proportion on greenfield land	1167 (45%)	2870 (69%)	1485 (62%)

Strategic Housing Land Availability Assessment (SHLAA)

6.4.14 Evidence on the potential availability of PDL and greenfield land for housing use can be found in the SHLAA for Wiltshire. This evidence enables Wiltshire Council to assess the supply of land for development in the County.

6.4.15 Wiltshire currently has two separate SHLAAs, one for South Wiltshire and one for the remainder of Wiltshire. It should be noted that whilst the general conclusions from these assessments are still credible, they are currently being updated. All sites from the existing SHLAAs as well as any further sites that have been identified have been aggregated into a single database, and a revised up to date SHLAA will be made available towards the end of July 2011. This revised assessment will provide a further test as to the feasibility of the proposed delivery on PDL sites.

6.4.16 The current SHLAAs identify the capacity to deliver 21,465 dwellings on PDL sites. The ratio between capacity of PDL and greenfield sites in the SHLAAs is 37% PDL and 63% greenfield land.

Windfall Development on PDL

6.4.17 Development on PDL also occurs on small windfall sites³³ that will not be included within the SHLAA.

6.4.18 In the last year, amendments have been made to PPS3 to change the definition of PDL, excluding some land such as private residential gardens, parks and allotments. This is likely to reduce the amount of small scale windfall development which comes

³³ Small PDL sites under 10ha.

forward on PDL. However, it will not entirely negate the delivery from this source and an allowance can be made for delivery on PDL sites.

Empty Homes

6.4.19 In Wiltshire in 2011 there were 5,446 empty homes which equates to 2.7% of the total housing stock. The national average is 4.1% of housing stock classed as empty homes. In Wiltshire the focus is on long term empty homes that have been empty for a period of more than 6 months. In March 2011 there were 1,754 long term empty homes in Wiltshire which had reduced from 2,026 long term empty homes in March 2010.

6.4.20 The strategic housing team has made contact with all empty home owners to encourage them to bring the homes back into use. The team are making best use of the private sector to maximise the opportunities for households who are threatened with homelessness through the Wiltshire Let scheme. This year, through the council's actions, a total of 342 properties have been brought back into use.

Consultation / Stakeholder Responses

Wiltshire 2026 consultation

- There were only a few responses to the Wiltshire 2026 consultation related to the prioritisation of development on PDL. These called for further development to be on PDL to protect nature from development, and a comment suggested that both housing, and employment growth should be principally, but not exclusively, on PDL.

Working towards a Core Strategy for Wiltshire consultation responses

- The responses referred to ensuring opportunities to develop previously developed military land is enabled. See topic paper 13 – military issues.

Engagement with Registered Social Landlords:

Summary of comments:

- Consideration needs to be given to how PDL can be made more attractive to developers. If we do not provide incentives, any PDL target set may not be met.
- One incentive could be a more flexible approach to change of use as land values are higher for housing, i.e. more flexibility in allowing change of use from employment to housing use.
- Availability is an issue on PDL. Consideration should be given to whether developer contributions could be prioritised differently on PDL sites.

Engagement with Wiltshire Housing Market Partnership:

Summary of comments:

- Statistics on PDL hide local issues. It is important to consider area by area issues.

- The PDL target is linked to the settlement hierarchy and where development is being focussed. If more development is allowed in more towns and villages, the target could be higher.
- Employment land supply needs to be factored into the process.
- Due to viability it is often harder to secure developer contributions on PDL. A higher target may mean less affordable housing contributions can be secured.

Setting A Target

6.4.21 A methodology has been developed for setting a target for development on PDL. This has been based on the following components:

- Outstanding commitments on PDL.
- Proposed strategic sites on PDL.
- An assumption for windfall development on PDL. This could be based on a 5 year windfall allowance or for potential windfall over the full plan period.
- An allowance for the remainder of the housing supply (likely to be taken forward on small site allocations) based on the ratio of PDL to greenfield sites in the SHLAAs.

The methodology is based on supply components. These are subject to change over time but provide a snapshot in time of the amount of realistic potential development on PDL.

PDL Trajectory

6.4.22 The above components can be plotted as a PDL trajectory for the core strategy. This could be calculated from 2006 or from the date of adoption. The methodology is forward looking and focuses on sites that are coming forward from 2012. Therefore the target will be calculated from 2012.

Windfall Allowance

6.4.23 The windfall allowance is based on historic trends. When calculating how much land is required for development for the plan period, PPS3 is clear that allowances for windfall development should not be included in the first 10 years of housing land supply.³⁴ Assessing potential capacity on PDL is a different context and an allowance for windfall could be provided for the full plan period.

6.4.24 The definition of windfall has been altered in PPS3 and now excludes private residential gardens, parks and allotments. This will reduce the amount of windfall development that comes forward in Wiltshire but it is too early to assess what this reduction will be.

6.4.25 Based on this methodology, policy options are proposed for setting a target for development on PDL in Wiltshire over the plan period. This ensures that the pros and cons of each option can be weighed up and will facilitate the sustainability

³⁴ Paragraph 59 of PPS3.

appraisal process. The following policy approaches have been explored as options for the PDL target.

1. 41% of development from 2012 will be on PDL (this is based on a windfall assumption for the full plan period).
2. 35% of development from 2012 will be on PDL (this is based on a windfall assumption after the first ten years of the plan period).
3. A spatial approach to the target. This could set separate targets by community area or more strategically by Housing Market Areas.
4. The draft NPPF now proposes to remove the national target and the requirement to set a locally derived target for the delivery of development on PDL. A further option is not to have a target for development on PDL.

Identifying and Testing Options for Addressing the Challenge

Option	Sustainability Appraisal outcome	Conformity with national and regional policy and/or regulations	Deliverability	Community aspirations met	Other	Conclusion
Option 1: 41% of development will be on PDL in Wiltshire.	The SA did not identify any significant effects for any options. If deliverable options 1 and 3 are likely to lead to higher levels of PDL so may have greater sustainability benefits.	Meeting PPS3 requirement to set a target for development on PDL.	Delivered through commitments, strategic sites, small site allocations and windfall development. The change to the definition of windfall to exclude private residential gardens, parks and allotments may mean the higher target is not deliverable.	Yes	-	Not preferred as uncertainty over deliverability.
Option 2: 35% of development will be on PDL in Wiltshire.	The SA did not identify any significant effects for the options. Option 2 may not sufficiently prioritise development on PDL.	Meeting PPS3 requirement to set a target for development on PDL.	Delivered through commitments, strategic sites, small site allocations and windfall development. This figure allows for 5 years worth of windfall – this allows leeway for a potential reduction in windfall due to the change in the definition of windfall to exclude private residential gardens, parks and allotments.	Yes	-	This option is preferred. This target is slightly lower than historic rates of delivery on PDL but allows for the likely reduction in windfall due to the change in the definition of windfall to exclude private residential gardens, parks and allotments.

Option	Sustainability Appraisal outcome	Conformity with national and regional policy and/or regulations	Deliverability	Community aspirations met	Other	Conclusion
<p>Option 3: A spatial approach to the target. This would set separate targets by community areas or more strategically by Housing Market Areas.</p>	<p>The SA did not identify any significant effects for the options. If deliverable options 1 and 3 are likely to lead to higher levels of PDL so may have greater sustainability benefits.</p>	<p>Meeting PPS3 requirement to set a target for development on PDL.</p>	<p>Delivered through commitments, strategic sites, small site allocations and windfall development. Setting such specific targets may make it difficult to be flexible to changing circumstances, for example, a target would not be met in an area if one PDL site did not come forward.</p>	<p>Yes</p>	<p>This option would be tailored to a specific area, for example, in an area with a large amount of redundant MoD land a higher target could be set. It would ensure that development on PDL is prioritised in areas where it is available.</p>	<p>At a community level this option will be too restrictive. However further work will be carried out to ascertain whether the overall target for Wiltshire could be disaggregated to Housing Market Areas.</p>
<p>Option 4: No target will be set for the amount of development delivered on previously developed land</p>		<p>This option has been added because the draft NPPF removed the national target for 60% of development to be on previously developed land and the requirement to set a local target for development on previously developed land.</p>	<p>N/A</p>	<p>This may result in a greater proportion of development coming forward on greenfield and and potentially does not meet community aspirations.</p>	<p>-</p>	<p>Not preferred – does not meet community aspirations.</p>

Target for development on PDL

6.4.26 A target of 35% will be set for development on previously developed land, to be incorporated into Core Policy 2 of the Wiltshire Core Strategy Consultation Document 2011.

Table 7³⁵ - Components of the proposed PDL target - Source: Wiltshire Council

Source of supply	Previous use	Expected delivery from 2012	% of supply from this source
Commitments	Greenfield	2745	47%
	Previously Developed Land	3133	53%
Strategic Sites	Greenfield	9760	85%
	Previously Developed Land	1750	15%
Windfall	Greenfield	0	0%
	Previously Developed Land	1599	100%
Remainder (based on the potential capacity identified in existing SHLAAs)	Greenfield	3963	63%
	Previously Developed Land	2327	37%
Total	Greenfield	16468	65%
	Previously Developed Land	8809	35%

Justification

6.4.27 This target is deliverable through commitments, strategic sites, windfall development and potentially through small site allocations (based on the ratio of PDL and greenfield sites in the SHLAAs).

6.4.28 It is slightly lower than historic rates of PDL delivery but this reflects Wiltshire's rural setting and allows for the change to the definition of windfall in PPS3 to exclude residential gardens, parks and allotments.

6.4.29 The draft NPFF removes the requirement to set a locally derived target. In Wiltshire it is still considered beneficial to retain a target for the delivery of development on previously developed land. The reasons for this are as follows:

³⁵ These components of supply will change over time but provide snap shot in time of the likely proportion of development to come forward on PDL over the plan period.

- Wiltshire is rural in nature and the relatively low target of 35% reflects the fact that a significant proportion of development will need to be on greenfield land.
- Whilst this is acknowledged, the rural nature of Wiltshire must be protected. Encouraging development on previously developed land wherever possible reduces greenfield land take.
- Previously developed land is often in town centres or sites where regeneration of the site would benefit the area and local community. In Wiltshire the redevelopment of the central areas in the market towns is a priority under strategic objective 7: to enhance the vitality and viability of town centres.

Phasing

6.4.30 The careful and flexible phasing of the land supply will enable Wiltshire Council to ensure that PDL is prioritised when appropriate. It can ensure that greenfield strategic sites are phased later in the plan period where appropriate to enable the PDL sites come forward.

6.4.31 It is not possible to accurately predict when new PDL may become available (for example, a factory may close down providing a new available PDL site). The phasing of some greenfield allocations later in the plan period can also ensure that there is flexibility to build these sites into the trajectory if required.

6.4.32 However it is also requisite that we provide a 5 and 10 year supply of housing sites so it may be necessary for some greenfield sites to come forward earlier in the plan period.

6.4.33 The housing strategy team are currently working towards reducing the number of empty homes in Wiltshire. This will be further addressed through an Empty Homes Strategy. Work on this will begin in 2012. Further consideration will be given to how planning policy can link into this strategy through the neighbourhood planning process or other planning mechanism.

6.5 Challenge H5 – Efficient Use of Land

Ensuring the efficient use of land, and high quality of building design, layout and construction, to achieve high standards of sustainability in new development, including appropriate densities.

6.5.1 Setting appropriate housing densities for development ensures that land is used efficiently and that greenfield land take is kept to a minimum. This is a particular issue in Wiltshire as the county is rural in nature and there is a relatively low amount of previously developed land available for development.

6.5.2 It is also essential that the density of development is appropriate to context and place. Design and density are closely interrelated and it is essential that design solutions are encouraged which will achieve higher density levels wherever possible. It should also be ensured that the density of development is not at the expense of high quality living environments or private amenity space.

National Policy

6.5.3 Planning Policy Statement 1 (PPS1) promotes the more efficient use of land through higher density, mixed use development. It also seeks to ensure that outputs are maximised whilst resources used are minimised.

6.5.4 Planning Policy Statement 3 (PPS3) requires land to be used efficiently. Local planning authorities are required to develop policies related to housing density and may set out a range of densities across the plan area.

6.5.5 Annex B defines net dwelling density as:

“Including only those site areas which will be developed for housing and directly associated uses, including access roads within the site, private garden space, car parking areas, incidental open space and landscaping and children’s play areas”.

6.5.6 PPS3 suggests housing density ranges should be based on:

1. The spatial vision and strategy.
2. The current and future capacity of infrastructure.
3. The desirability of using land efficiently and reducing the impacts of climate change.
4. Accessibility.
5. The characteristics of an area.
6. The desirability of achieving high quality design.

6.5.7 Until recently PPS3 set a minimum indicative density of 30 dwellings per hectare. This has now been removed giving local planning authorities more flexibility on the density levels it sets for development.

6.5.8 PPS3 also states that:

“Good design is fundamental to using land efficiently” (paragraph 48).

6.5.9 It is particularly important when planning for high density developments and ensuring they are integrated within the existing built environment.

6.5.10 In line with PPS3 the draft NPPF is flexible and requires local planning authorities to set out their own approach to housing density to reflect local circumstances.

Evidence

6.5.10 Evidence on density in Wiltshire can be found in the monitoring of new development.

Table 8- Table showing average density by type of place in housing developments completed between 2001-2010 - Source: Wiltshire Council

Place	Average density of housing development (dwellings per hectare)
Wiltshire county	23
Principal settlements of Chippenham, Trowbridge and Salisbury	37
Town centres of Chippenham, Trowbridge and Salisbury	87

6.5.11 Further information and examples of high quality design and density can be found in topic paper 10 ‘built and historic environment’.

Consultation Responses and Stakeholder Input

Wiltshire 2026 consultation responses:

- There were a few comments in response to the Wiltshire 2026 consultation that related to the density of housing development but there was no consensus amongst the comments. They called for higher density but also for lower density.

There were some comments that related to the potential development of specific density requirements on specific strategic sites, and further information was requested on the levels of density that will be required on specific sites.

Working towards a Core Strategy for Wiltshire consultation responses

Summary of comments:

- Reference to a minimum density of 30 dwellings per hectare should be removed and is not in line with national policy.
- Core policy 39 is too prescriptive.

Engagement with Registered Social Landlords:

Summary of comments:

- Density targets need to be flexible. Sites can become sterilised if density targets cannot be met.
- Consideration should be given to allowing a market led approach to density.
- Some guidance and target ranges are necessary. There is a risk developers will build all executive homes if a density target is not set. Density affects land value and criteria should be used to ensure there is a level playing field.
- Design is a key aspect of density. Examples of high quality, high density developments should be sought. It is possible to have high quality, high density rural developments.
- It may be that place based criteria could be used to set density targets.
- Density should be site specific.

Engagement with Wiltshire Housing Market Partnership:

Summary of comments:

- It makes sense to set densities on a site by site basis.
- The SHLAA and SHMA should be used to set density targets.
- A criteria based policy would allow flexibility.

Identifying and Testing Options for Addressing the Challenge

Three policy approaches were tested through the sustainability process. These policy approaches have focused on the density aspect of this challenge.

Option	Sustainability Appraisal outcome	Conformity with national and regional policy and/or regulations	Deliverability	Community aspirations met	Conclusion
Option 1: Residential development should be an indicative minimum of 30 dwellings per hectare. Only exceptionally, in locations where there is a strongly defined low density character, will development densities below 30 dwellings per hectare be acceptable.	Option 1 is flexible and non-restrictive and could lead to wide-ranging housing provision. This option will allow for higher density and affordable homes but also for larger homes if required.	Meeting PPS3 requirement to develop housing density policies.	Delivered through commitments, strategic sites, small site allocations and windfall development. The policy is flexible and should be deliverable. The minimum indicative density of 30 dwellings per hectare should not be so low that it prevents development being viable.	The flexibility of this approach should meet community aspirations.	This option is preferred because it offers a flexible approach that can be suited to the context of place but also offers a minimum density requirement that can minimise greenfield land take.
Option 2: As option 1 but with no indicative minimum.	Option 2 sets no indicative minimum and therefore it is possible that there could be significant loss of greenfield land.	Meeting PPS3 requirement to develop housing density policies.	-	The flexibility of this approach should meet community aspirations.	This option offers a flexible approach that can be suited to the context of place. However the lack of any minimum density requirements reduces the ability to control greenfield land take.

Option	Sustainability Appraisal outcome	Conformity with national and regional policy and/or regulations	Deliverability	Community aspirations met	Conclusion
<p>Option 3: In the following locations the density of development should fall within the ranges specified below: In and around the town centre of the market towns: >50dph Market towns: >30dph Rural areas: 20-40dph</p>	<p>Option 3 is likely to give the largest number of significant benefits. Promoting a higher density in and around town centres will aid regeneration and reduce pressure to build on greenfield land. Although this approach could be too rigid and not allow for exceptional circumstances.</p>	<p>Meeting PPS3 requirements to develop housing density policies and to consider setting a range of densities.</p>	<p>This approach may be too rigid and impact negatively on the viability and therefore delivery of housing development.</p>	<p>This policy should ensure appropriate densities are delivered in different types of place and therefore should meet community aspirations.</p>	<p>This option has the potential to minimise greenfield land take and maximise density where regeneration of previously developed land is important. However it may be too rigid and have a negative impact on the viability of development. Criteria set in the policy could instead direct appropriate density to type of place.</p>

Density considerations in the Core Strategy

6.5.12 Further to the above policy on housing density has been encompassed within topic paper 10 historic and built environment.

6.5.13 A decision has been made to remove the requirement for an indicative minimum density of 30 dwellings per hectare in light of the consultation responses and that it has been removed from national guidance. Making effective use of land is a priority and the Core Strategy will ensure that the most effective use of land is made. It is therefore considered appropriate to remove the minimum density requirement.

6.5.14 See topic paper 10 built and historic environment.

6.6 Challenge H6 – Mixed and Balanced Communities

Developing mixed and balanced communities and bringing forward developments that provide an appropriate mix of housing in terms of size, type, tenure and affordability to meet local needs, including specialist needs.

National Policy Considerations

6.6.1 The Local Plan should include criteria within the specific Place Shaping Policies for each strategic site, requiring an appropriate range, type and mix of housing on the site in accordance with up to date information for the area; and in particular aiming to meet the needs of an increasingly elderly population.

6.6.2 PPS3 says that LPAs should have regard to the relevant sub-regional housing market assessment and regional and local housing strategies in determining the overall mix of different household types and sizes. A broad mix of housing should be provided on large sites. On smaller sites, a mix should be provided that contributes to the creation of sustainable communities.

6.6.3 The Draft National Planning Policy Framework states that local planning authorities should plan for a mix of housing based on current and future demographic trends and the needs of different groups in the community (such as families with children, the elderly and people with disabilities).

Evidence

6.6.4 The council has produced an up-to-date Strategic Housing Market Assessment (SHMA) for Wiltshire, which will identify the mix and type of dwellings which will best meet the needs of Wiltshire's communities within the plan period. The emerging evidence, generated from the household survey, suggests that the type and tenure variations, at present across Wiltshire are comparatively slight.

6.6.5 Among the variations, the area within the vicinity of Swindon contains a markedly higher proportion of detached properties and flats/maisonettes. The area which contains Salisbury Plain and the garrison towns of Tidworth and Ludgershall contains fewer detached, and more terraced units. The east of Wiltshire contains slightly more bungalows than other areas.

- 6.6.6 Differences in tenure are again comparatively slight. The east of Wiltshire has fewer owner occupiers, and slightly more private rented (including armed forces) than elsewhere. The West has more owner occupiers, and lower proportions of social and private renting occupiers. The area within Wiltshire adjacent to Swindon has significantly more owner occupiers than average, essentially those with a mortgage, and less social rented. The west of Wiltshire has a higher proportion of second homes than the other two areas, although still only 1.4% the garrison area of Tidworth and Ludgershall also has a higher proportion of second homes.
- 6.6.7 Differences in house size (in terms of bedroom numbers) are again comparatively minor, for the main market areas at least. The East has fewer one bedroom and more two bedroom dwellings.
- 6.6.8 The Salisbury Plain area has fewer one bedroom, more two bedroom, and fewer four bedroom properties. The area within Wiltshire adjacent to Swindon has fewer one and two bedroom dwellings, and more dwellings with over four bedrooms. Southern Wiltshire has more dwellings of one and two bedrooms, and fewer of more than five bedrooms.
- 6.6.9 The following tables (table 9 and 10) show traditional 'like' and 'expect' outcomes. As is normal, people would like a larger home than they expect to get, or are able to afford. Obviously this information has little operational value as it does not represent the way in which the true market operates.

*Table 9 - Number of bedrooms preferred and expect in future home (moving households only)
Source: Wiltshire household survey, Fordham Research (2011).*

	Like		Expect	
	Count	%	Count	%
One	2,279	5.2%	4,212	9.6%
Two	11,422	25.9%	16,150	36.7%
Three	18,452	41.9%	16,721	37.9%
Four	10,240	23.2%	6,003	13.6%
Five	1,352	3.1%	953	2.2%
Six	320	0.7%	25	0.1%
Total	44,064	100.0%	44,064	100.0%

Table 10 - Preferred and expect dwelling type of future home (moving households only). Source: Wiltshire household survey, Fordham Research (2011).

	Like		Expect	
	Count	%	Count	%
Detached	27,525	62.5%	13,292	30.2%
Semi-detached	8,079	18.3%	14,400	32.7%
Terraced	1,934	4.4%	6,348	14.4%
Flat/apartment	2,724	6.2%	6,673	15.1%
Maisonette	0	0.0%	237	0.5%
Bungalow	3,802	8.6%	3,026	6.9%
Mobile home	0	0.0%	88	0.2%
Total	44,064	100.0%	44,064	100.0%

6.6.10 Table 11 shows a typical difference between what respondents would like, and what they expect in terms of tenure. Again this information does not represent the way in which the true market operates, although it does give an important insight to peoples' expectations and therefore provides useful information to consider when planning the mix and type of housing to be built in the future.

Table 11 - Preferred and expect tenure of future home (moving households only). Source: Source: Wiltshire household survey, Fordham Research (2011)

	Like		Expect	
	Count	%	Count	%
Buy own home	27,300	62.0%	18,141	41.2%
Rent from Council	8,111	18.4%	8,117	18.4%
Rent from HA/RSI	3,404	7.7%	5,202	11.8%
Rent in PRS	2,311	5.2%	8,399	19.1%
Rent from friend/relative	56	0.1%	299	0.7%
Armed service accommodation	1,236	2.8%	1,960	4.4%
Tied/linked to job	418	0.9%	523	1.2%
Shared Ownership	507	1.2%	290	0.7%
House/flat share	143	0.3%	263	0.6%
Other	577	1.3%	871	2.0%
Total	44,064	100.0%	44,064	100.0%

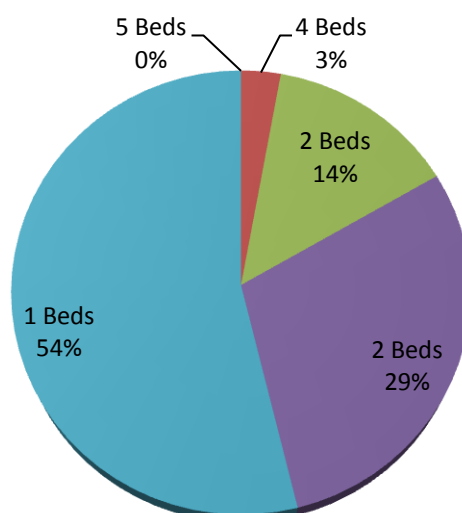


Figure 14 - Housing register number of bedrooms - Source: Wiltshire Council July 2010

- 6.6.11 The council's housing register also provides an interesting insight into the types of homes needed by Wiltshire's population. This information (figure 14) reveals that a high proportion of people are seeking single bedroom accommodation.
- 6.6.12 By 2026 the composition of Wiltshire's older age groups will have changed dramatically. There will be a higher proportion of the older age groups, including the over 85s, and double the number of older disabled people³⁶. It is therefore important that new homes are suitable to meet the needs of households in the future including an ageing population.
- 6.6.13 A 'Lifetime Home' is a house or flat that incorporates a number of specific features designed to ensure that it is accessible and adaptable, so that it is able to meet the needs of most households. The Joseph Rowntree Foundation developed the concept of Lifetime Homes in the early 1990s in response to concerns over the quality of housing at that time. There are 16 standards or features which new houses and flats should incorporate in order to achieve a Lifetime Home rating. These relate to issues such as lighting, parking, width of doorways and hallways, etc. Lifetime Homes are similar to, but build upon, the legal requirements of Part M of the Building Regulations 2004: Access to and Use of Buildings.
- 6.6.14 The Joseph Rowntree Foundation conducted a national comparative study into the cost of meeting both Building Regulations and Lifetime Home standards. The additional cost of building Lifetime Homes ranged from £165 to a maximum of only £545 per dwelling, depending on the size, layout and specification of the property.
- Lifetime Homes, Lifetime Neighbourhoods: A National Strategy for Housing in an Ageing Society seeks to Make Lifetime Home standards the norm for all new housing by 2013;

³⁶ http://www.lifetimehomes.org.uk/data/files/Reports/lthltn_dclgstrategy.pdf

- Planning Policy Statement 3: Housing seeks to ensure that consideration is given to the provision of market and affordable housing that meets identified needs and the current and future demographic trends of the area.

6.6.15 Overall it is estimated that 41,465 households in Wiltshire have one or more members in an identified support needs group – this represents 21.5% of all households. It should be noted that a household found to have a support need will not necessarily need to move to alternative accommodation.

6.6.16 Table 12 shows the number of households with each type of support need. Households with a ‘medical condition’ are the predominant support needs group. The next largest group is those with a physical disability.

Table 12 - Support needs categories. Source: Wiltshire household survey, Fordham Research (2011)

Category	Number of households	% of all households	% of support needs households
Medical condition	22,880	11.9%	55.2%
Physical disability	13,464	7.0%	32.5%
Frail elderly	7,908	4.1%	19.1%
Mental health problem	6,465	3.3%	15.6%
Learning difficulty	5,777	3.0%	13.9%
Severe sensory disability	2,790	1.4%	6.7%
Other	3,265	1.7%	7.9%

Consultation Responses and Stakeholder Input

Wiltshire 2026 consultation responses:

- Promote the overall objective of self-containment
- Infrastructure before new development
- Policy should refer to the need for new development to mitigate against climate change
- Opportunities for continued sustainable development at Melksham, Warminster and Westbury
- Urban focus at the SSCTs is supported
- Housing needs of the elderly need to be addressed
- Importance of community development

Working towards a Core Strategy for Wiltshire consultation responses:

- The draft core policy on mix and type should refer to need and ‘demand’ not just need
- The meaning of tenure should be defined
- The explanatory text should be expanded to define the meaning of ‘credible evidence’ in the context of assessing mix and type requirements

- The wording 'innovative housing schemes' should be changed to 'innovative schemes' to allow for C2/C3 use within the core policy
- Reference should be made to 'Continued Care Retirement Communities' as an alternative type of care provision
- The last paragraph of CP29 refers to allowing extra care development adjacent to the defined limits of development at principal settlements and market towns. This should refer to all types of care provision
- It is not realistic to apply Lifetime Homes standards to all development. The policy should be reworded to consider factors that impact on whether a development can meet Lifetime Homes standards, for example, physical constraints or impacts on viability
- Only 30% of homes should be required to meet lifetime homes standards
- Core policy 30 should be deleted.

Wiltshire Registered Social Landlord Forum stakeholder engagement:

Summary of comments:

- Homes should be designed so people can stay in their own home, if they wish to, for longer as they age.
- It might not be necessary to apply lifetime home standards to all new properties.
- Further research should be undertaken to understand how many homes should be adaptable rather than require all homes to meet lifetime homes standards.
- Consideration should be given to how a town should change, not just what current trends / needs are, for example, do we want more young people in the market towns?
- The provision of extra care housing is very important – consideration should also be given to ensuring that an affordable element of extra care provision is secured.

Wiltshire Housing Market Partnership stakeholder engagement:

Summary of comments:

- Important to allow communities to have their say on the type of homes which should be developed within Wiltshire.
- Viability is an important consideration when determining the size and type of dwellings.
- Specialist needs accommodation is very important and the core strategy should make reference to this.
- Lifetime home standards don't deal with problems with existing housing stock.

Identifying and Testing Options for Addressing the Challenges

Option	Sustainability Appraisal outcome	Conformity with national and regional policy and/or regulations	Deliverability	Community aspirations met	Conclusion
Allow housing type and mix to come forward as the market dictates.	Option 1 is not felt to be sustainable as the market may deliver the house types best for developer profit rather than local community needs.	Uncertain - PPS requirement to have regard to relevant sub-regional SHMAs and regional / local housing strategies when determining mix.	Yes – delivered by developer / verified through the determination of planning applications.	Unlikely - likely to be driven by financial considerations rather than local needs.	Likely to be inappropriate – unlikely to deliver the types of homes required by Wiltshire’s communities.
Set targets for specified housing type and mix on a Wiltshire wide basis.	Option 2 is felt to be less sustainable as option 3 as delivering housing needs on a Wiltshire basis may not deliver the correct house types for a local area.	Yes - type and mix defined within the emerging SHMA could be applied on a Wiltshire wide basis.	Yes – delivered by developer / verified through the determination of planning applications.	Uncertain – will give certainty to partners and developers. Gives little flexibility in terms of responding to local need and circumstances within specific areas.	Appropriateness uncertain – will give certainty to partners and developers. Gives little flexibility in terms of responding to local need and circumstances.
Define mix and type based upon up-to date evidence on an area by area basis.	For the housing policy area option 3 is felt to have the greatest positive effect as the local evidence should deliver the housing needs required at the local level.	Yes - type and mix defined within the emerging SHMA could be applied on an area basis.	Yes – delivered by developer / verified through the determination of planning applications.	Yes – will give certainty to partners and developers and will give flexibility to respond to local need and circumstance within specific areas.	Likely to be the most appropriate – allows for flexibility and a level of confidence for partners and developers.

Meeting Housing Needs

6.6.17 The core strategy will need to include policy which seeks to ensure that the appropriate mix of housing is built within Wiltshire to meet the needs of its communities. The appropriate type and mix of homes are vitally important to meeting Wiltshire's housing needs and developing mixed, balanced and inclusive communities. These priorities are outlined within national and local strategies. Policies within the core strategy will need to ensure that, through development management in particular, new housing development addresses these priorities meeting general and specialist housing needs, both in the towns and the rural areas.

Proposed core policies relating to this challenge

Core Policy – Meeting Wiltshire's housing needs

Type, mix and size

New housing, both market and affordable, must be well designed to address local housing need incorporating a range of different types, tenures and sizes of homes to create mixed and balanced communities.

Housing size and type, including any distinction between flats and houses, will be expected to reflect that of the demonstrable need for the community within which a site is located. The Wiltshire Strategic Housing Market Assessment identifies the housing needs of Wiltshire. Any variation to this will need to be justified through the production of new, sound evidence from either an updated Strategic Housing Market Assessment or other credible evidence source.

In relation to affordable housing other sources of credible evidence include the council's housing register and local needs surveys.

Core Policy – Meeting the needs of Wiltshire's vulnerable and older people

The provision, in suitable locations, of new housing to meet the specific needs of vulnerable and older people will be encouraged and supported. Wherever practicable accommodation should seek to deliver and promote independent living.

Older people

Housing schemes should assist older people to live securely and independently within their communities. Residential development must ensure that layout, form and orientation consider adaptability to change as an integral part of design at the outset, in a way that integrates all households into the community.

The Council will also encourage the provision of homes which incorporate 'Lifetime Homes Standards' within the design so that they can be readily adapted to meet the needs of older people and those with disabilities. Developers will be required to demonstrate how their proposals respond to the needs of an ageing population.

Specialist accommodation

The provision of sufficient new accommodation for older people will be encouraged and supported, including:

- I. Nursing accommodation
- II. Residential homes
- III. Extra care facilities

The council will also support the provision of homes for vulnerable people, including:

- I. People with learning disabilities
- II. People with mental health issues
- III. Homeless people and rough sleepers
- IV. Young at risk and care leavers

Such accommodation should be provided in sustainable locations, where there is an identified need, within settlements identified in Core Policy 1 (normally in the principal settlements and market towns) where there is good access to services and facilities.

In exceptional circumstances, the provision of specialist accommodation outside but adjacent to defined limits of development at the principal settlements and market towns will be considered, provided that:

- I. a genuine, and evidenced, local need is justified
- II. environmental considerations will not be compromised
- III. the site is accessible to facilities and services
- IV. its scale and type is appropriate to the nature of the settlement it adjoins and will respect the character and setting of that settlement

Justification

6.6.18 The Council recognises that some discretion is appropriate when interpreting policy into practice. For example, if the Strategic Housing Market Assessment (SHMA) or other credible evidence indicates that there is a sufficient current supply of 3-bedroom accommodation for social rent, but proposals that include 3-bedroom houses for social rent would not necessarily be rejected. They would be considered in the context of overall proposals, discussed in detail at the pre-planning application stage, and the requirements checked against local housing need data current at the time.

6.6.19 The proposed core policies also seek to address the issue of an ageing population, which is particularly important in Wiltshire, seeking to ensure that new housing development meets Lifetime Homes Standards and that there is adequate provision of specialist accommodation, such as extra care housing³⁷.

6.6.20 The SHMA for Wiltshire provides the evidence required to inform the appropriate development of new housing schemes, giving information on existing housing stock and housing need. This assessment will also inform the tenure mix of affordable

³⁷ Wiltshire's Older People Accommodation Strategy
<http://cms.wiltshire.gov.uk/mgConvert2PDF.aspx?ID=17693>

housing developments, which will be determined on a site by site basis having regard to the existing stock in an area and information on local needs, and with reference to the priorities of the council's housing strategy.

- 6.6.21 Wiltshire has an ageing population profile and research also suggests that many older people across Wiltshire continue to live at home. Lifetime Homes are designed to allow dwellings to meet the changing needs of their occupiers over time and enable people to stay in their own homes for longer. The provision of lifetime homes will play an important role in meeting future housing needs and this is reflected in Core Policy 30.
- 6.6.22 Further detail on the operation of the policy will be set out in an Affordable Housing SPD.

6.7 Challenge H7 – Affordable Housing

Meeting the need for affordable housing within new developments and elsewhere through 'exception sites'.

National Policy Considerations

- 6.7.1 Planning Policy Statement 3: Housing, states that an overall target for the amount of affordable housing must be set including; separate targets for social-rented and intermediate affordable housing, where appropriate; set threshold requirements for affordable housing (with 15 dwellings being an indicative minimum); specify the size and type of affordable housing required; where viable and practical, consider allocating and releasing sites solely for affordable housing, including using a Rural Exception Site Policy; and ensure affordable housing targets are viable³⁸.

Evidence

- 6.7.2 Affordable housing is central to the success of thriving mixed communities, but with house prices rising rapidly, and mortgages severely curtailed in the current economic conditions, affordability is a bigger issue than ever. There are over 13,000 individuals on the council's waiting list, and the average house price is increasingly out of reach for many of Wiltshire's residents.
- 6.7.3 Affordable housing includes homes for social rent under the long-term management of registered providers of social housing (including former Registered Social Landlords); and affordable sale through the Home Buy Scheme. All new build affordable homes will have to meet the HCA's quality and design standards, including environmental sustainability levels and minimum room sizes in excess of those in the private sector.
- 6.7.4 Affordable housing is defined by the government as either social rented (owned and managed by local authorities and Registered Social Landlords, for which guideline

³⁸ This enables small sites in rural locations that would not normally be available for housing (because, for example, they are subject to policies of restraint) to be granted permission specifically for affordable housing.

target rents are determined through the national rent regime) or intermediate (at prices and rents above those of social rent, but below market price or rents. These can include shared equity products). It excludes low cost open market housing.

- 6.7.5 There has been a gradual deterioration in affordability within Wiltshire, determined by the ratio of lower quartile house price to lower quartile income. If a multiplier of 3.5 is assumed, in order to gain a mortgage, then based on the average income a Wiltshire resident would be able to afford to borrow £77,262. The average price for a flat within Wiltshire is within the region of £130,000. This is reflected by the number of households on the council's waiting list (Chippenham, Trowbridge and Devizes community area represent some of the highest levels of demand). Between 2003/04 and 2008/09 Wiltshire's delivery of affordable housing provision averaged c.24% of all new dwellings. Within the same period East Wiltshire delivered c.30%, North Wiltshire c.22%, South Wiltshire c.25%, and West Wiltshire c.19%. The relationship between local incomes and the realistic supply of affordable stock continues to exacerbate affordability issues within Wiltshire.
- 6.7.6 Affordable housing delivery from planning obligations is viable when the cost to the developer in the form of a discounted price to the affordable housing provider can be accommodated in the scheme economics, without undermining profitability, and the cost of this developer contribution is reflected in the price paid for the land.
- 6.7.7 On small sites, issues of viability are recognised to be more critical. During the forthcoming stages of the core strategy production, the council will aim to undertake more detailed work to determine the appropriate range of circumstances for which affordable housing will be required, and thresholds based upon an assessment of economic viability.

Related publications:

Implementing self-financing for council housing
Published: 1 February 2011

Modelling business plans for council landlords: Report on model inputs assumptions and outputs
Published: 1 February 2011

Council Housing: A real future - Summary of responses to the consultation
Published: 30 November 2010

Data on Seaside and Country Homes Scheme
Published: 29 October 2010

Council housing: A real future (Prospectus)
Published: 25 March 2010

Modelling business plans for council landlords: Local authority financial model user guide
Published: 1 February 2011

Stock Valuation for Resource Accounting: Guidance for valuers - 2010
Published: 26 January 2011

Local decisions: a fairer future for social housing
Published: 22 November 2010

Review of social housing regulation
Published: 18 October 2010

Fair and flexible: statutory guidance on social housing allocations for local authorities in England
Published: 4 December 2009

Tackling unlawful subletting and occupancy:
Good practice guidance for social landlords
Published: 30 November 2009

Consultation Responses and Stakeholder Input

Wiltshire 2026 key responses:

- The core strategy should clearly define targets and delivery mechanism for affordable housing
- Affordable housing is supported as a key objective
- Provision should be supported by an appropriate analysis of need
- Smaller affordable housing is needed
- In appropriate circumstances exception sites should include open market homes to aid viability
- Affordable housing can only be delivered through a suitable level of open market housing provision
- Exception sites hardly ever deliver
- Viability should be taken into consideration
- Obligations should be considered on a site by site basis
- Focus should be on more affordable housing rather than more housing in general

Wiltshire Registered Social Landlord Forum stakeholder engagement:

Summary of comments:

- Rural exception sites could be incentivised by allowing some open market housing. This could enable exception sites to be more viable.
- It is important that the core strategy clearly defines the term 'affordable housing'.
- Consideration should be given to when off-site affordable housing contribution might be acceptable.

Wiltshire Housing Market Partnership stakeholder engagement:

Summary of comments:

- The more land made available for housing will lead to more affordable housing coming forward.
- It is important to look at how the new affordable rent classification is negotiated within S.106 agreements.
- The potential to cross subsidise rural exception sites with a proportion of open market housing should be investigated - concerns were also raised that this would attach disproportionate 'hope value' to sites.
- A nil grant environment should not necessarily be seen as a barrier to delivery. Areas within Wiltshire have previously delivered affordable housing without grant subsidy.

Identifying and Testing Options for Addressing the Challenges

Option	Sustainability Appraisal outcome	Conformity with national and regional policy and/or regulations	Deliverability	Community aspirations met	Conclusion
Retain the current policies saved within the extant local plans.	No significant effects are envisaged through Option 1. Continuing with saved policies will not improve on the current situation and will not achieve the appropriate level of provision in future.	Uncertain – full audit of extant local plan policies required. Unlikely that current policy will be compliant.	Likely to be inappropriate – gives no clear direction for partners, or developers. No positive justification in terms of provision can be attained from this approach.	Unlikely – this option will give no certainty to the level of provision across Wiltshire.	Likely to be inappropriate – gives no clear direction for partners, or developers. No positive justification in terms of provision can be attained from this approach.
Adopt an ambitious policy approach which seeks a considerable step change in the level of provision across the plan period – prioritising the provision of affordable homes.	It is not known what level of provision would be required and how ambitious this might be – the significance of any effects would depend on the actual level required. However, adopting an overly ambitious approach could lead to under achievement of housing targets and this could exacerbate the affordability issues.	Uncertain - Local planning authorities are required to undertake an informed assessment of the economic viability of any thresholds and the proportions of affordable housing being proposed.	Likely to be inappropriate – this policy approach would consequently lead to other onsite objectives, and strategic objectives, not being delivered or downplayed.	Unlikely – aspirations to deliver affordable housing would be met. However, other community aspirations would potentially suffer as a consequence.	Likely to be inappropriate – this policy approach would consequently lead to other onsite objectives, and strategic objectives, not being delivered or down played.
Implement a consistent policy approach across Wiltshire, which seeks to secure a level of provision, which enables the delivery of affordable housing alongside other objectives contained within the strategy.	This option proposes a more consistent approach which would take account of the findings of viability assessments and would be more likely to achieve desired housing targets as well as a range of other social and economic objectives. Option 3, through a more balanced approach that increases housing viability for developers, would also allow appropriate provision	Yes – affordable housing policy can be applied on a Wiltshire wide basis drawing upon an up-to-date evidence base including viability assessment.	Likely to be most appropriate – will give assurance to both partners and developers. Simple to implement and monitor and will enable other plan objectives to be achieved.	Yes – policy option will allow the delivery of affordable housing to be achieved alongside other community aspirations.	Likely to be most appropriate – will give assurance to both partners and developers. Simple to implement and monitor and will enable other plan objectives to be achieved.

Option	Sustainability Appraisal outcome	Conformity with national and regional policy and/or regulations	Deliverability	Community aspirations met	Conclusion
	of a range of market housing to meet the needs of all, including higher-earning households.				

Providing Affordable Homes

6.7.8 Perhaps the biggest contribution that can be made in Wiltshire to addressing disadvantage and inequalities is through providing everyone with access to a decent and affordable home. One of the key issues facing Wiltshire is the provision of new housing to help meet the needs of its communities. Core Policy 2, within the draft core strategy consultation document, identifies the requirement for 37,000 new homes to be provided over the plan period including affordable homes. The supply of affordable housing is a particular issue within Wiltshire which has been exacerbated by rising house prices in recent years. It is critical that any new homes benefit new and existing communities.

Proposed core policies relating to this challenge

Core Policy - Providing affordable homes

Provision

Affordable housing provision of 40%(net) will be provided on sites of 15 or more dwellings, and a requirement for 25% (net) on sites of 5 to 14 dwellings. Only in exceptional circumstances, where it can be proven that on-site delivery is not possible, will a commuted sum be considered. The tests for considering off-site contributions will be set out in the Wiltshire Housing Supplementary Planning Document (SPD).

On sites of 4 dwellings or less a financial contribution will be sought towards the provision of affordable housing. The level of contribution will be set within the Wiltshire Housing SPD.

The provision of affordable housing may vary on a site-by-site basis taking into account evidence of local need, mix of affordable housing proposed and where appropriate the viability of the development.

This level of provision should be delivered with nil public subsidy.

Tenure

Tenure will be negotiated on a site-by-site basis to reflect the nature of the development and local needs as set out in Core Policy **xx** (Meeting Wiltshire's housing needs).

On site distribution and standards

Affordable housing units will be dispersed throughout a development and designed to a high quality, so as to be indistinguishable from other development. In determining the level of integration that can be achieved consideration will be given to the practicalities of management and maintenance associated with the proposal whilst still ensuring affordability, particularly in developments of flats.

In addition, all affordable housing units must be developed to the latest Housing Corporation standards. Currently these standards are set out in the Housing Corporation's 'Design and Quality Standards' (April 2007)'.

Supplementary guidance

The Wiltshire Housing Supplementary Planning Document (SPD) will:

- define the tests for considering off-site contributions
- for sites consisting of 4 dwellings or less specify the level of financial contribution
- define a clear approach to the assessment of financial viability
- define local affordable housing definitions where appropriate
- give further guidance relating to distribution and standards

Core Policy – Rural exceptions sites

At settlements defined as Large and Small Villages (Core Policy 1), and those not identified within the settlement hierarchy, a proactive approach to the provision of affordable housing will be sought in conjunction with Parish Councils, local communities and other parties. This exception to policy allows housing for local need to be permitted, solely for affordable housing, provided that:

- I. the proposal is within, adjoining or closely related to the existing settlement
- II. the housing is being delivered to meet an identified and genuine local need
- III. environmental considerations will not be compromised
- IV. the site is accessible to employment and services
- V. its scale and type is appropriate to the nature of the settlement it adjoins and will respect the character and setting of that settlement

Cross-subsidy

A proportion of market housing will be considered where it can be demonstrated that the site would be unviable without cross-subsidy. Applicants will need to demonstrate, through financial appraisal, that the scale of market housing is essential for the successful delivery of the development and that the preceding criteria has been met.

Supplementary guidance

The Wiltshire Housing Supplementary Planning Document (SPD) will:

- provide further guidance to criteria i – vi
- define a clear approach to the assessment of cross-subsidy

Justification

6.7.9 The preceding core policies set out when affordable housing provision will be required and indicates the proportions which will be sought linked to open market housing development. Both housing and planning policies will be used to promote the delivery of new affordable homes. This policy intends to provide a clear and robust planning policy framework for all those involved in the delivery of affordable housing and should be considered alongside the Wiltshire Housing Strategy, which is currently being prepared.

6.7.10 Appropriate tenure and affordability are key to meeting housing needs and to developing mixed, balanced and inclusive communities. The provision of affordable

housing linked to open market housing development must be realistic, with regard to economic viability, but flexible to variations between sites and changes in market conditions over the plan period.

- 6.7.11 National policy on Housing as set out in PPS3 requires an overall, plan-wide target to be set for the amount of affordable housing to be provided. It is anticipated that the Core Strategy will deliver at least 11,000 new affordable homes within the plan period, of which 2218 have been delivered at 1 April 2010.
- 6.7.12 The core policies will be subject to a detailed assessment of need, through the completed Strategic Housing Market Assessment, and a detailed viability assessment. It is anticipated that provision will be made without grant subsidy.
- 6.7.13 Preliminary research suggests that a sliding policy approach, as presented, will respond to viability considerations most appropriately. However, the policy approach may change as a consequence of the finalised viability assessment which at the time of writing is being finalised for consideration. The justification for an affordable housing policy remains due to the evidence of need presented within the Wiltshire SHMA.
- 6.7.14 The draft NPPF states that 'In rural areas, local planning authorities should be responsive to local circumstances and plan housing development to reflect local requirements, particularly for affordable housing. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.' The exceptions site policy includes a cross-subsidy element which allows for a proportion of open market homes to be delivered in exceptional circumstance. The open market proportion will only be appropriate to plug a viability gap – the open market element should not raise developer profitability of a viable site. Applicants will be expected to demonstrate through an open book exercise the justification for cross-subsidy.
- 6.7.15 It is anticipated that the council will develop further guidance on the operation of this policy within an Affordable Housing SPD.

7 Emerging policy and government initiatives

- 7.1 The council is aware of a number of government policy statements and initiatives which will need to be taken account of when considering housing policy within the emerging core strategy including:

New Homes Bonus

The New Homes Bonus commenced in April 2011, and will match fund the additional council tax raised for new homes and empty properties brought back into use, with an additional amount for affordable homes, for the following six years. The New Homes Bonus seeks to address the disincentive within the local government finance system for local areas to welcome growth.

Further details of the scheme design and announcements (including final Year One allocations) can be found on the New Homes Bonus home page <http://www.communities.gov.uk/housing/housingsupply/>.

Community Right to Build

As part of neighbourhood planning, the government has introduced the Community Right to Build in the Localism Bill (published December 2010). This will give groups of local people the power to deliver the development that their local community wants, if it meets minimum criteria and receives majority support from the community through a local referendum.

This new right seeks to remove barriers that prevent local people taking forward community led development for the benefit of the community.

Empty homes

Over 300,000 homes around the country have been empty for longer than six months. Local Authorities have a key role in identifying empty homes and working with owners to bring them back into use. The government has given a commitment that we will explore a range of measures to bring empty homes into use.

The government has recently announced that a 'empty homes fund' is available to local authorities, house-builders and developers, affordable housing providers and local community groups, which can all bid for a share of the funding to bring long-term empty properties - which would not come back into use without intervention - to become homes once again.

<http://www.communities.gov.uk/articles/housing/emptyprospects>

Social Housing Reform

In November 2010 the Rt. Hon. Grant Shapps MP, Minister for Housing and Local Government, announced plans for reform of the social housing system.

Local decisions: a fairer future for social housing³⁹ - a consultation published 22 November 2010, included changes to the way people access social housing, the types of tenancies which are provided and the way that the homelessness duty is discharged. These changes will be introduced in The Localism Bill⁴⁰, which was unveiled on 13 December 2010 by Communities and Local Government Secretary, Eric Pickles.

These plans are part of a wider package of measures that have already been announced, to reform the social housing system.

- improving social housing mobility
- changing the way social housing is regulated
- reform of the council housing finance system, and
- doing more to bring empty homes back into use as affordable housing.

Affordable Rent Model

On 14 February 2011 Grant Shapps, the Minister for Housing made a Written Ministerial Statement confirming publication of a Framework for the Affordable Homes Programme 2011-15⁴¹. The principal element of this programme is an Affordable Rent model to be offered by Housing Associations and other providers.

The Framework sets out details of the new Affordable Rent funding model, which is designed to maximise the delivery of new social housing by making the best possible use of public subsidy and to provide an offer for the full range of people who need to access social housing. This new delivery model seeks to give providers greater flexibility on rents and use of assets, increased choice for tenants and greater value for money in the delivery of new affordable homes.

³⁹ <http://www.communities.gov.uk/publications/housing/socialhousingreform>

⁴⁰ <http://www.communities.gov.uk/localgovernment/decentralisation/localismbill/>

⁴¹ <http://www.homesandcommunities.co.uk/affordable-homes>

8 Collaborative Working

- 8.1 Along with the consultation responses summarised within chapter 6 the council has also worked with a wide range of stakeholders and organisations to help inform the housing topic paper.
- 8.2 Wiltshire and Swindon Housing Market Partnership – the partnership brings together representatives from the public and private sector that contribute to and influence the delivery of housing within Wiltshire. The main role of the partnership is to promote housing delivery and give a strategic overview of the evidence base for the Local Development Framework (LDF) and housing policies. Membership of the partnership comprises of representatives from the following bodies:
- House builders
 - Planning consultants
 - Estate Agents
 - Registered Providers
 - Homes and Communities Agency
 - MoD
 - Government Office
 - Council Officers
 - House Builders Federation
 - Other interested parties
- 8.3 Officers undertook a workshop with the housing market partnership during January 2011. The information assembled during this event has helped shaped the proposed draft policies contained within chapter 6.
- 8.4 Wiltshire Registered Providers Forum – the aim of the forum is to work in partnership with the Homes and Communities Agency, Registered Providers (RP) and Wiltshire Council (WC) as part of a 4 year programme (with a 3 year review) to increase the provision of affordable housing in Wiltshire, to meet both regional and local priorities. Membership of the forum includes
- The Homes and Communities Agency
 - Registered providers
 - Council officers
- 8.5 Officers undertook a workshop with the housing forum during November 2011. The information assembled during this event has helped shaped the proposed draft policies contained within chapter 6. The council has also collaborated with the Wiltshire Rural Investment Partnership.

9 Bibliography and references

People, Places and Priorities: Wiltshire Community Plan 2011 - 2026 (2010)	http://www.wiltshire.gov.uk/communityandliving/communityplan/communityplanfaq.htm
Energy Change and Opportunity Strategy 2011 – 2020 (2011)	http://www.wiltshire.gov.uk/communityandliving/countryside/climatechange.htm
Planning Policy Statement 1 (PPS1): Delivering Sustainable Development (2005)	http://www.communities.gov.uk/publications/planningandbuilding/planningpolicystatement1
Planning Policy Statement 3 (PPS3): Housing (2006)	http://www.communities.gov.uk/publications/planningandbuilding/pps3housing
Planning Policy Statement 7 (PPS7): Sustainable Development in Rural Areas (2004)	http://www.communities.gov.uk/publications/planningandbuilding/pps7
South Wiltshire Core Strategy Submission Document (2010)	http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/southwiltshirecorestrategy/southwiltshirecorestrategysubmissiondraft.htm
West Wiltshire Leisure and Recreation Development Plan Document (2009)	http://www.wiltshire.gov.uk/leisureandrecreationdevelopmentplan.htm
Wiltshire 2026 – Planning for Wiltshire’s Future (2009)	http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/wiltshirecorestrategy/wiltshire2026.htm
Wiltshire and Swindon Structure Plan (2006)	http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/structureplan2016.htm
Wiltshire biodiversity action plan (2008)	http://www.biodiversitywiltshire.org.uk/
Wiltshire Council Business Plan (2011)	http://www.wiltshire.gov.uk/wilts-council-2011-business-plan.pdf
Wiltshire Council draft Housing Strategy (2011)	http://consult.wiltshire.gov.uk/portal/housing/building_strong_foundations_-_the_housing_strategy_for_wiltshire_2011_-_2016_consultation
Wiltshire housing land availability assessment (2010)	http://www.wiltshire.gov.uk/services/hlaahome.php
Wiltshire local area agreement (2010)	http://www.wiltshire.gov.uk/council/wiltshirefamilyofpartnershipsworkingtogether/localagreementforwiltshire.htm
Wiltshire’s Older People Accommodation Strategy (2010)	http://cms.wiltshire.gov.uk/mgConvert2PDF.aspx?ID=13576

10 Glossary

Adaptations	Those works to a property that need to be carried out for the benefit of a disabled person. This could be providing a stair lift, a bath lift or a level access shower, or building a single storey extension to provide kitchen, bedroom and bathroom facilities.
Affordable Housing (AH)	Subsidised and low-cost housing that meets the needs of those whose income does not enable them to buy or rent properties in the open market
Annual Monitoring Report	Part of the local development framework, the annual monitoring report assesses the implementation of the local development scheme and the Annual Monitoring Report extent to which policies in local development documents are being successfully implemented.
Building for Life Assessments	Measures the design quality of new housing developments.
Community infrastructure levy (CIL)	The community infrastructure levy (CIL) is a new levy that local authorities can choose to charge on new developments in their area.
Core Strategy	A core strategy sets out the long term spatial vision for the local planning authority area, as well as the spatial objectives and the strategic policies to deliver that vision. A core strategy has the status of a development plan document.
Decent Homes Standard	The Government has set a target that all social housing will meet this standard by 2010. It requires that a property meets the basic legal standard for habitation, should be in reasonable repair, have reasonably modern facilities and services, and provides a reasonable degree of thermal comfort.
Development Plan	A development plan consists of the relevant regional spatial strategy (or the spatial development strategy in London) and the development plan documents contained within its local development framework.
Empty Homes Strategy	A range of initiatives aimed at bringing empty, privately owned homes across the district back into use, providing homes for people in housing need and reducing the number of new homes which must be built.
Homes4Wilts hire (H4W)	This is the new choice based lettings system for Wiltshire Council.
House in multiple occupation (HMO)	A house that is occupied by people who do not form a single household; e.g. shared houses, hostels, bedsits and flats.
Housing Association	An organisation which owns, manages, builds and/or lets houses, but which does not trade for profit.
Housing needs survey	A survey of a sample of people living in an area to determine what type of housing should be provided to meet present and future requirements.
Housing register	The list of people who have applied to be re-housed by a social housing provider.
Lifetime Homes	A 16 point standard developed by the Joseph Rowntree Foundation which aims to ensure that houses and flats will be able to meet the needs of most households, including those with young children, elderly and disabled people.
Local Agreement for Wiltshire (LAW)	The Local Agreement for Wiltshire is an agreement between organisations in Wiltshire to take action over the next 3 years to improve the quality of life in Wiltshire.
Local Area Agreement (LAA)	The LAA is included within the Local Agreement for Wiltshire and is an agreement between Wiltshire and Central government. It sets out targets for improvements that are important to both Wiltshire and Central government.
Local Plan	A set of policies prepared by a Council which set out economic, social and environmental issues against which planning applications will be judged within its district.
Low Cost Home Ownership	There are two main types of LCHO – shared ownership and shared equity – see separate definitions

Preferred development partnership (PDP)	The partnership of housing associations identified by the Council as best placed to deliver more affordable housing in the county. The Council will seek to achieve new affordable housing through this partnership using Homes and Community Agency grant and its own funding.
Previously developed land (PDL)	Land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure. This includes defence buildings but excludes: <ul style="list-style-type: none"> • Land that is or has been occupied by agricultural or forestry buildings. • Land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures. • Land in built-up areas such as private residential gardens, parks, recreation grounds and allotments which has not been previously developed. • Land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.
Registered social landlords (RSL)	These are often called housing associations. However, not all housing associations are registered social landlords. Registered social landlords are registered with the Housing Corporation and are regulated and monitored by them. Landlords can also apply for grant funding from the Corporation.
Section 106 agreements (S106)	Section 106 (s106) of the Town and Country Planning Act 1990 is the legal basis upon which a local authority can enter into a legally binding agreement, or planning obligation, with a landowner in association with the granting of planning permission. This obligation is called a section 106 agreement. These agreements are a way of delivering or addressing matters that are necessary to make a development acceptable in planning terms. They have been used to support the provision of services and infrastructure, such as highways, recreational facilities, education, health and affordable housing.
Shared equity	The other main type of LCHO scheme is the shared equity model normally called HomeBuy Direct. The shared equity model enables you to buy a property on the open market with the help of an equity loan, either from a housing association, from the HCA or from a developer. You will then need to get a conventional mortgage for your share. Homebuy Direct, an equity loan scheme is funded by government and involves an equity loan of up to 30% provided jointly by a developer and government.
Shared ownership	Whilst this can sometimes be used to describe the general arrangements when the occupier owns part of the equity of a house and an organisation such as a housing association owns the remainder, it is typically used to describe such an arrangement structured in accordance with a specific set of arrangements as defined by the Homes and Community Agency.
Social housing	Housing provided by a Housing Association, charity or Council.
Strategic Housing Land Availability Assessment (SHLAA)	A survey of the sources of potential housing supply, and assessment of delivery criteria to provide an assessment of potential deliverable supply.

Strategic Housing Market Assessment (SHMA)	An assessment of need and demand for housing.
Sustainable development	Development which is sustainable in that it meets the needs of the present without comprising the ability of future generations to meet their own needs.
Tenure	The manner in which a household occupies the property where they live, e.g. owner-occupier, private tenant.