

Swindon and Wiltshire Local Enterprise Partnership

Joint Strategic Economic Committee

14 February 2017

Update on Strategic Housing Market Assessment and Functional Economic Market Area Assessment

1. Purpose

- 1.1 To provide an update to the Joint Strategic Economic Committee (JSEC) on the implications of the Wiltshire and Swindon Strategic Housing Market Assessment (SHMA) and Functional Economic Market Area Assessment (FEMAA) for plan making and joint working between the two authorities and next steps.

2. Background

- 2.1 Wiltshire Council's Core Strategy (adopted January 2015) and Swindon Borough Council's Local Plan (adopted March 2015) have plan periods to 2026. Both authorities are committed to the early review of their adopted plans and work has begun on this process through the preparation of a joint SHMA and FEMAA. Opinion Research Services (ORS) and Hardisty Jones Associates (HJA) have been appointed to undertake the SHMA and FEMAA. Updates on progress have been reported to previous Committees.
- 2.2 The SHMA and FEMAA aim to provide an understanding of functional housing market and economic geographies, together with an objective assessment of the need (OAN) for housing (both market and affordable) and employment in terms of the number of new jobs by sector and land by employment use that are likely to be created in the period 2016 to 2036. They form the basis for the review of Swindon Borough Council's Local Plan and Wiltshire Council's Core Strategy.
- 2.3 In accordance with legislation, local authorities have a 'duty to cooperate' in relation to "*sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) ... infrastructure that is strategic and has or would have a significant impact on at least two planning areas*" and are required to consider whether or not to prepare joint development plan documents. The duty to co-operate is also referred to in the Government's National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). The PPG states that the objective of cooperation is to maximise the effectiveness of plan making. The NPPF clarifies that cooperation should take place in relation to planning issues that cross administrative boundaries; in particular, those relating to strategic priorities, which include (amongst other things) strategic policies for the delivery of homes, jobs and infrastructure.
- 2.4 The authorities have therefore committed to reviewing their Local Development Schemes collaboratively once the SHMA and FEMAA were sufficiently advanced to inform decisions about the approach to future joint working.
- 2.5 On 7 February, Government published the White Paper 'Fixing our broken housing market', which proposes a number of reforms to the development plan system and indicates changes to regulations and the National Planning Policy Framework including: the need for Local Plans to be reviewed every five years; standardised

approach to assessing housing requirements; authorities working together to ensure housing requirements are met; and simplifying the plan making process. Officers from both Councils are reviewing the White Paper with a view to making formal responses by the consultation deadline of 2 May 2017.

3. SHMA and FEMAA

- 3.1 Progress continues to be made on the SHMA and FEMAA. Draft reports have been received and considered by the Joint Working Group on 7 February. Clarification is being sought on a few outstanding matters in need of further clarification before these are finalised and made available. An outline of the methodology, overall headline findings and implications for plan making are provided below.

SHMA

- 3.2 As reported to previous JSEC meetings, four HMAs are identified centred on Chippenham, Salisbury, Swindon and Trowbridge. Taken as a whole the four HMAs align to the Swindon and Wiltshire unitary authority areas. The individual HMAs do not align with the individual local authority boundaries or correspond to the HMAs planned for in the adopted Wiltshire Core Strategy and Swindon Local Plan.
- 3.3 The approach to identifying OAN for housing is consistent with Government guidance. Its starting point is a demographic-based household projection which is adjusted to reflect a longer term (10 year) migration trend than the 5 year trend used in CLG household projections. In considering the migration trends, the impact of service personnel has been considered and the specific increase in service personnel living in barracks (part of the institutional population) due to army re-basing has been factored into the overall population projections.
- 3.4 The demographic projection is then converted into a number of dwellings, making adjustments to reflect second homes, vacancy and suppressed household formation (the latter adjustment takes into account current affordable housing need that is not included within the projections). The resultant dwelling projection is then subject to further adjustments to ensure alignment with future employment growth projections and in response to market signals (house prices, rents, affordability, overcrowding and rate of development).
- 3.5 The SHMA will also provide a projection of minimum affordable housing need based on the percentage of newly forming households unable to buy or rent in the area. Only households that would be eligible for welfare support are counted as unable to afford to buy and rent. This is added to current need and is identified as a percentage of total projected housing need.
- 3.6 The full OAN for housing over the 20-year period 2016-36 is 73,000 dwellings in Swindon and Wiltshire or 3,650 dwellings per annum. This compares to a level of approximately 3,600 dwellings per annum set out in the authorities adopted Plans.
- 3.7 Until it is tested at examination through the Plan making process, the objectively assessed need for housing should not be portrayed as a new housing requirement for planning purposes. The number of additional homes that need to be planned for through the plan reviews will be assessed in detail in the plan preparation process.
- 3.8 The SHMA report will set out the individual OAN for each HMA. In considering the SHMA outputs, it should be kept in mind that:

- The SHMA objectively assessed need for housing will not necessarily simply become the plan review housing targets. Instead, it may be that, for policy reasons, the authorities may plan for more or fewer homes in a particular HMA, taking account of the overall necessity to ensure that the level of need evidenced in the SHMA across the Swindon and Wiltshire area as whole is met.
- Unmet needs (if there are any) from neighbouring authorities may need to be considered.
- The distribution of new homes between the unitary authorities and their constituent HMAs will not necessarily be as set out in the SHMA. It may be considered desirable to plan for inter HMA redistributions in order to promote sustainable development, co-locate new homes with supporting infrastructure and jobs, address local affordability problems, or protect environmentally sensitive areas

3.9 The SHMA is the first stage of plan making. It is an evidence base document which will inform the local plan reviews. Government guidance on the status of SHMA evidence is set out in PPG and further advice is provided in a Written Ministerial Statement from Brandon Lewis MP to the Planning Inspectorate titled ‘Strategic Housing Market Assessments’ (19 December 2014):

“...the outcome of a Strategic Housing Market Assessment is untested and should not automatically be seen as a proxy for a final housing requirement in Local Plans. It does not immediately or in itself invalidate housing numbers in existing Local Plans.”

3.12 It is considered, in line with government guidance, that the Core Strategy and Local Plan requirements remain the applicable housing requirements for the authorities. Monitoring and the determination of planning applications will therefore continue to be undertaken in accordance with the housing requirements contained in the adopted development plans for Swindon and Wiltshire.

FEMAA

3.13 The FEMAA report identifies three ‘best fit’ functional economic market areas (Swindon/M4 corridor, A350/West Wiltshire towns and Salisbury/Amesbury/A30) that broadly correspond with the three economic zones of the Strategic Economic Plan ‘

3.14 The FEMAA report projects future employment growth based on economic forecasts from Oxford Economics (OE) and Cambridge Econometrics (CE). These forecasts are based on historic trends and detailed analysis of national economic potential. They do not take into account any specific local policy initiatives.

3.15 Using OE and CE baseline forecasts and stakeholder views, sector-based employment forecasts have been produced. These can then be apportioned, based on current shares, to each FEMA and sector-based employment forecasts converted into anticipated additional floorspace requirements for each FEMA.

3.16 The headline figures for 2016 to 2036 employment growth and office and industrial floor space requirements for Wiltshire and Swindon are around 40,250 jobs overall, with 35 to 85 hectares of Office floorspace and 215 hectares industrial floorspace.

3.17 Overall, the requirement equates to 15 hectares per annum across Wiltshire and Swindon in the period to 2036. This compares to employment land policies in the

adopted Swindon Local Plan and Wiltshire Core Strategy which provide just under 17ha per annum in employment land across Wiltshire and Swindon.

- 3.18 The FEMAA figures for jobs and employment land are not directly comparable with the adopted Local Plan and Core Strategy figures. The FEMAA figures are 'policy off', whereas the Local Plan and Core Strategy employment land requirements are 'policy on'. The 'policy off' FEMAA figures do not take into account local objectives or initiatives in relation to job creation and economic growth.

4. Joint Working

- 4.1 The SHMA and FEMAA show that functional housing and economic geographies cross the administrative boundary between the local planning authorities of Wiltshire and Swindon. They clearly show that further joint working in developing strategic policies for housing, economic development and infrastructure should be undertaken. The Joint Working Group considered the nature of joint working that would need to be undertaken and the options for taking forward the review of the Council's respective Plans, as set out below.

Strategic priorities and developing the evidence base

- 4.2 Effective plan-making would involve future joint working between Swindon Borough and Wiltshire Councils on the following strategic priorities which could have cross-boundary implications:
- The quantum and spatial distribution of new homes and jobs within the Swindon HMA.
 - The ability of each HMA within Swindon and Wiltshire to sustainably meet its own housing needs.
 - The quantum and location of future employment land within Swindon and Wiltshire.
 - The transport and other infrastructure (e.g. water and energy infrastructure) that may be required to support housing and employment growth, particularly within the Swindon HMA and Swindon/M4 corridor FEMA.
 - Environmental factors which may include flood risk, biodiversity, and landscape character insofar as they have cross-boundary implications in informing decisions on the above issues.
- 4.3 It is considered that effective joint working on strategic priorities is likely to require additional evidence to be prepared on an aligned or joint basis. Officers are reviewing the authorities' existing evidence bases to identify gaps and areas on which jointly or separately prepared new or updated evidence is required. At this stage the financial cost of new evidence is not known. Wherever possible officers will identify opportunities to update and renew evidence 'in house', working in partnership with internal colleagues, for example in transport, education and economic development or with duty to cooperate partners for example Highways England and Historic England. It is envisaged that an important part of the evidence base will be the consideration of the potential for additional growth in the Swindon area to inform the most sustainable approach to accommodating growth across the Swindon HMA.

- 4.4 Subject to review and agreement between the respective local authorities, new or updated evidence is likely to be required in the following areas:
- Aligned sustainability appraisal frameworks for Swindon and Wiltshire to allow appraisal of reasonable alternatives on a consistent basis to underpin plan making.
 - Completion and publication of respective Strategic Housing Land Availability Assessment/ Strategic Housing and Economic Land Availability Assessment to inform an assessment of capacity for development within the Swindon HMA.
 - An assessment of broad locations and specific sites for housing and economic growth within the Swindon HMA and Swindon/M4 corridor FEMA respectively.
 - Transport evidence, including advice upon and modelling of options, including potential mitigation.
 - Landscape character and impact assessment evidence.
 - Flood risk and biodiversity evidence.
- 4.5 Cross boundary relationships between Swindon and Wiltshire and other neighbouring authorities will need to be identified and the subject of cooperation with those authorities. Similarly, cooperation will need to take place with other duty to cooperate partners, including the Swindon and Wiltshire Local Enterprise Partnership (LEP) and statutory consultees. The basis of this co-operation will develop as evidence is reviewed and the process of plan making identifies relevant cross boundary relationships

Options for Plan Making

- 4.6 For the current (adopted) plans, joint working was undertaken on a more informal basis, which culminated in agreement in statements of common ground between the two authorities. However, given the functional geographies identified in the joint SHMA and FEMAA, particularly the Swindon HMA and Swindon/M4 Corridor FEMA it is considered that a different approach is required to ensure a sound basis for plan making.
- 4.7 Drawing on practice elsewhere in England, three principal options have been identified:
- (i) A comprehensive single formal joint statutory plan. This could either cover all of Swindon and Wiltshire or be prepared at a Swindon HMA scale.
 - (ii) A formal joint strategic statutory plan with underlying separate local plans. The strategic plan could cover housing and employment numbers, their apportionment and the broad spatial distribution of development, strategic development locations, and strategic infrastructure. This in effect would be a two part development plan similar to the old Structure Plan/District Local Plan format.
 - (iii) Aligned but separate local plans for each authority, informed by a joint evidence base and a non-statutory 'joint framework' covering matters similar to a joint strategic plan which both authorities are 'signed' up to.
- 4.8 A table summarising advantages and disadvantages of each of these options is provided at **Appendix 1** to this report.

- 4.9 In assessing options and developing a proposed approach to joint working, officers have secured assistance through the Planning Advisory Service from IPE (Intelligent Plans and Examinations) and have had an initial informal challenge workshop with Keith Holland, assistant Director of the Planning Inspectorate with specific responsibility for Development Plans.

Recommended Approach to Joint Working

- 4.10 The third option listed in paragraph 4.7 above, that is to pursue separate but aligned plans alongside a joint non-statutory framework, would appear to be the most effective and proportionate option for Wiltshire and Swindon for the following reasons:
- It facilitates streamlined reviews of the recently adopted development plans, allowing a 'light touch' approach to reviewing development management policies as appropriate for each authority.
 - It provides a means to move forward relatively quickly with the plan reviews following publication of the SHMA and FEMAA and to ensure a five year housing land supply.
 - It enables each authority to pursue its own plan informed by the non-statutory framework.
 - It avoids the lengthy two-stage plan-making process that a joint strategic statutory plan would necessitate including separate examinations in public for the strategic and local plans. This is considered to be important in light of Wiltshire's recent experience of the draw-backs of a two-stage approach, which saw developers submitting speculative applications and appeals ahead of the preparation of housing site allocations plans.
 - It avoids the complexity of seeking to bring forward a comprehensive new joint statutory plan for Swindon and Wiltshire.
 - It provides strong evidence of meeting the legal and policy tests with regard to cooperation, and could act as a platform from which to align land-use and infrastructure planning across the LEP area which should assist when bidding for funding or attracting investment.
- 4.11 A key component of effective collaborative working between the two authorities under this model would be the development and agreement of a joint non-statutory spatial framework which sets the broad spatial approach to the quantum and location of development and supporting infrastructure, informed by a shared evidence base, with decisions over detailed site allocations to be made through the authorities' individual plan reviews. The proposed outline of the scope for the joint spatial framework is set out at **Appendix 2**.
- 4.12 A schematic process diagram for future joint working on aligned plan reviews alongside a joint framework is set out at **Appendix 3**.
- 4.13 The process shown in Appendix 3 would allow the joint framework to both guide and respond to the concurrent formal local plan preparation processes. However, while this is the preferred approach based on current thinking, officers will continue to test other options as the next steps are progressed and develop the detailed timelines. The implications of the White Paper will need to be considered as these become

clearer. However an initial consideration of the White Paper is that the proposed approach to joint working is not incompatible with its proposals.

- 4.14 The Joint Working Group endorsed this approach and agreed that a detailed programme for joint working including projected timings would need to be prepared for approval by the authorities as part of the review of their respective Local Development Schemes.

5. Next Steps

5.1 The next steps for advancing joint working are for officers to:

- (i) Develop a scope, methodology and programme, and identify resource requirements (including need for commissioned evidence) to support the approach to joint working and inform updates to the Local Development Schemes (LDSs) for approval by respective Cabinets in Summer 2017.
- (ii) Develop governance arrangements for joint planning and preparation of local plan reviews for integration into project timelines.
- (iii) Finalise the SHMA and FEMAA reports for consideration by the next Joint Working Group and subsequent JSEC.

5.2 In order to make timely progress, officers will commence preparation for the initial Regulation 18¹ consultations (to include scope of local plan reviews, approach to joint plan making and SHMA and FEMAA reports) so that the authorities can move expediently to consultation subject to the LDSs being approved by the Council's respective Cabinets. This should be overseen by the Joint Working Group in order to ensure a coordinated approach.

5.3 The Joint Working Group should consider (i), (ii) and (iii) at its meeting in April 2017 in order to reach an agreed position on the proposed changes to the LDS for consideration by the Council's respective Cabinets.

6. Recommendation

6.1 To:

- (i) Note and endorse the approach to joint working as outlined in this report;
- (ii) Agree that the Joint Working Group consider proposed changes to the Council's respective LDSs to ensure a coordinated approach in order to make recommendations to the Council's respective Cabinets;
- (iii) Agree that the Joint Working Group consider the extended scope of the joint non-statutory framework and the appropriate joint approach to the Regulation 18 consultations; and
- (ii) Agree that the final SHMA and FEMAA should be considered at JSEC in June.

¹ This is a public consultation on the subject of a local plan that the local authority proposes to prepare in which comments are invited on what the plan ought to contain. It is a formal stage of the statutory plan-making process under the Town and Country Planning (Local Planning) (England) Regulations 2012.

Appendix 1: Broad Options for Joint Working

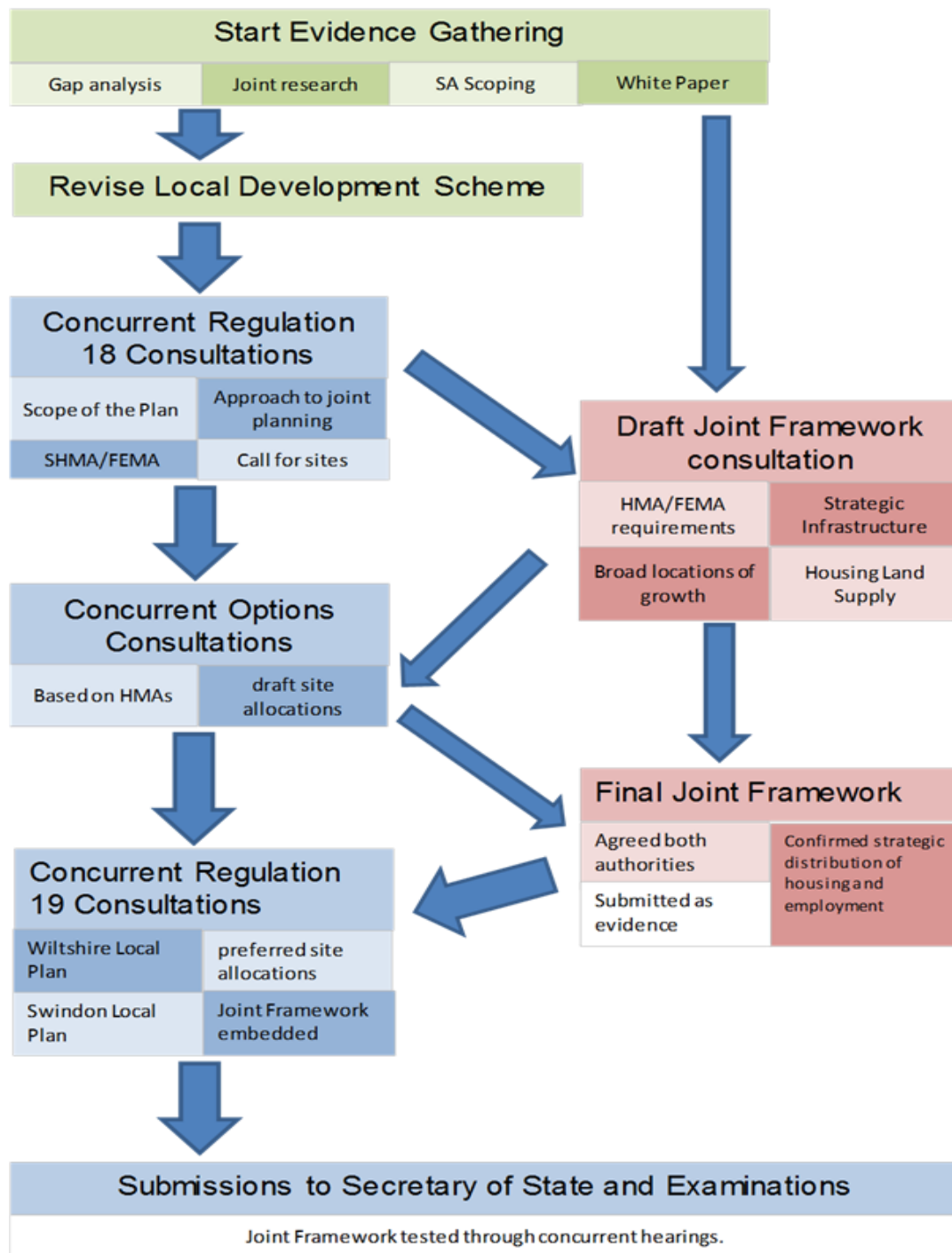
Option	Pros	Cons
<p>(i) A comprehensive single joint statutory plan This would be comprehensive providing a single joint plan for Swindon and Wiltshire or the Swindon HMA.</p>	<ul style="list-style-type: none"> ▪ A joint plan would have full statutory weight in decision making and would clearly demonstrate compliance with the duty to cooperate. ▪ Would create a joint vision and provide the greatest opportunity for aligning land-use and infrastructure planning at the Local Enterprise Partnership scale (if undertaken for Wiltshire and Swindon). ▪ Synergies and joint working could reduce resource outlay. Potential for joint team, integration of community engagement and single examination. ▪ Once adopted would create a binding joint plan. 	<ul style="list-style-type: none"> ▪ A comprehensive joint plan would be complex and slow to produce. It would involve work to re-write and align policies in the Councils recently adopted Local Plan/Core Strategy. ▪ Delay. A loss of political support may require each authority to return to early phases of plan making. ▪ There may be concerns about 'sovereignty' and because of the difference in the size and nature of the two authorities there could be increased public opposition to statutory joint planning compared to separate plans. ▪ Communities could feel disenfranchised by the move from the single Core Strategy to Wiltshire and Local Plan for Swindon, only recently adopted.
<p>(ii) A joint strategic statutory plan This would be restricted to strategic policies only, requiring separate local plans as well It could cover all of Wiltshire and Swindon or just the Swindon HMA.</p>	<ul style="list-style-type: none"> ▪ A joint plan would have full statutory weight in decision making and would clearly demonstrate compliance with the duty to cooperate. ▪ Would create a joint vision and provide the greatest opportunity for aligning land-use and infrastructure planning at the Local Enterprise Partnership scale (if undertaken for Wiltshire and Swindon). ▪ There are some suggestions that it is viewed as the government's preferred approach to joint working. ▪ A joint plan focusing on strategic planning policies would restrict scope to matters to be resolved at strategic level, efficiencies in approach to plan making and policies only examined once. ▪ Once adopted would create a binding joint plan. 	<ul style="list-style-type: none"> ▪ There may be concerns about 'sovereignty' and because of the difference in the size and nature of the two authorities there could be increased public opposition to statutory joint planning although this could be less than for option (i). ▪ Delay. A strategic policies only plan would defer the allocation of smaller sites to subsequent local plan reviews, potentially paving the way for speculative planning applications and land supply problems. Would need to work up review of plans alongside strategic policies. ▪ Confusion. Strategic policies only plan or Swindon HMA comprehensive plan, as separate policy document, would need to be used alongside Core Strategy/Local Plans superseding policies in whole/part. ▪ This is the most resource intensive option because it would require two stages of statutory plan-making and examination in public: the joint plan first and then the separate local plans. ▪ Delay. A loss of political support may require each authority to return to early phases of plan making

Option	Pros	Cons
<p data-bbox="91 177 427 268">(iii) Joint non-statutory framework with individual local plans</p> <p data-bbox="91 300 461 608">This would set out an agreed joint position on housing and employment numbers, their apportionment and the broad spatial distribution of development within a joint non-statutory framework which would inform the authorities' two separate (but aligned) Local Plans.</p>	<ul data-bbox="483 145 1008 823" style="list-style-type: none"> ▪ Would be comparatively quick to prepare and light in terms of evidence-base requirements. ▪ Could create a joint vision, presenting the opportunity to align land-use and infrastructure planning, and could act as an effective 'bid document'. ▪ Would provide flexibility in that it could be updated quickly in the face of changing circumstances. ▪ The framework would demonstrate joint working under the duty to cooperate. ▪ Facilitates streamlined reviews of the recently adopted development plans, allowing a 'light touch' approach to reviewing development management policies. ▪ Following agreement to the non-statutory framework an unforeseen delay in one plan would not create an equivalent delay in the other 	<ul data-bbox="1030 145 1921 671" style="list-style-type: none"> ▪ Framework will be examined through the individual local plans. Overall strategy would not be examined separately unless timelines are aligned to allow for conjoined examination of cross boundary matters for both authorities arising from the framework. ▪ The non-statutory framework would not have the weight in decision making of a statutory plan. ▪ The non-statutory framework would not allocate development sites. Sites would be allocated in the individual local plans ▪ The framework would not be tested until the examinations of the underlying Local Plans, creating risk it would need to be revisited later. ▪ The framework would not be binding in that it would not be formally part of the development plan. ▪ Delay. A loss of political support may require each authority to return to early phases of plan making ▪ Staggered examinations could create burden for first plan being examined to justify overall strategy.

Appendix 2 - Outline of Proposed Scope and Structure of the Joint Spatial Framework

1. The Joint Spatial Framework would set out in broad terms the quantum and spatial distribution of new jobs, homes and infrastructure in Swindon and Wiltshire in the period 2016-2036.
2. The Joint Spatial Framework would be non-statutory and would not therefore be a development plan document or subject to examination in public in its own right. However, it would be tested through the examination of the respective local plans. The LDS timelines will be aligned to allow for the conjoined examination of the cross boundary matters between both Councils arising from the Joint Spatial Framework.
3. The Framework would cover all of Wiltshire and Swindon but would include separate sections for each Housing Market Area (HMA). There are best fit Functional Economic Market Area (FEMA) definitions with the HMAs that will allow the alignment of jobs and workers at the HMA level to form the basis for plan making.
4. The section of the Framework which concerns the Swindon HMA and the 'Swindon/M4 corridor' FEMA will be based on evidence prepared through joint working by Swindon Borough Council and Wiltshire Council officers.
5. Those sections of the Framework covering the other Wiltshire HMAs (the Chippenham, Salisbury and Trowbridge HMAs) and 'A350/West Wiltshire towns' and 'Salisbury/Amesbury/A303' FEMAs will be led by Wiltshire Council with joint working undertaken only in relation to cross-boundary implications with the Swindon HMA and/or 'Swindon/M4 corridor' FEMA.
6. A consultation strategy will be developed for the Joint Spatial Framework to reflect the Councils' respective Statements of Community Involvement (SCI). Joint public consultation will be held to develop the Joint Spatial Framework. This consultation will not be part of the formal local plan review process, which will need to be undertaken separately by each respective planning authority in relation to their plans, but will be programmed to inform and be aligned with the formal local plan review process (see Appendix 3). The Framework will also be informed by consultations on the local plan reviews.
7. The final Joint Spatial Framework would be agreed by both authorities to inform the local plan reviews and support the Regulation 19 pre-submission consultations.
8. The Framework would broadly set out the overall scale and distribution by authority and HMA of housing growth in the plan period.
9. Through an iterative process the broad spatial distribution of housing development is agreed through the Framework to meet the identified needs, as appropriate, across the respective HMAs. This will include the identification of broad locations where growth will take place. However it will not identify specific sites as this will be a matter for the individual local plans to address.
10. The Framework will identify the overall scale and distribution of planned employment land by FEMA and authority.
11. The Framework will identify strategic employment locations but not individual sites.
12. The Framework will identify the infrastructure needed to support the level of growth, in particular transport infrastructure.

Appendix 3: Process Diagram for Joint Working



Key

Joint Framework stages

Aligned (but separate) Local Plan stages