

Written Statement on Behalf of Marlborough College (ID: 1138628)**Response to Inspector's Matters & Issues (8 February 2019)****Matter 2: Consistency with the Wiltshire Core Strategy (WCS)
Issues 2.1, 3.1, 3.2 and 3.4****Does the WHSAP make adequate provision to meet housing requirements as set out in the WCS? Does the distribution of site allocations accord with the spatial strategy in the WCS?**

- 1.1 The Wiltshire Housing Site Allocations Plan ('WHSAP') states that its aim is to identify sufficient housing allocations to ensure five-years supply of housing land is maintained in each Housing Market Area ('HMA') (Submission Draft Plan, July 2018; paragraph 1.1). To achieve this, having regard to the spatial strategy of the Wiltshire Core Strategy (2015; 'WCS'), the WHSAP further states that the priority is to focus allocations on *'those higher tier settlements that have not yet met or contributed towards indicative levels of provision'* (paragraph 4.3). Higher tier settlements are defined as Principal Settlements and Market Towns (Schedule of Proposed Changes, July 2018; reference PC5).
- 1.2 Whilst identified as a Market Town (i.e. second tier settlement), the WHSAP does not propose to allocate any sites at Marlborough. The reason being that Marlborough has almost met the indicative levels of provision provided for in the WCS (WCS Table 5.8 identifies a need for 920 new homes in the Marlborough Community Area with the 2018 Housing Land Supply Addendum Topic Paper advising a requirement for 10 further homes in the Marlborough Area; Table 4.2). However, the WHSAP is clear that the housing levels are a minimum (see paragraphs 2.13 and 4.2) and despite Marlborough being a higher tier settlement and having not met the minimum level, no further land is proposed for allocation in this location.
- 1.3 The minimum level of housing provision identified in the WCS is predicated on data from 2011 (for example, the Strategic Housing Market Assessment, December 2011) which is now over seven years old. The methodology for establishing objectively assessed housing need ('OAN') and, indeed, levels of need within Wiltshire and Marlborough specifically, have moved on. These figures can no longer be considered up to date. Whilst the WHSAP may be able to identify sufficient housing land to accommodate need from 2011, it does not, in our view, allocate sufficient land to provide flexibility to respond to changing housing needs at the County, HMA or settlement level and will quickly be out of date, if it is not already.
- 1.4 The effect of failure to allocate any additional land at Marlborough is, barring the odd windfall, to constrain new development pending the review of the WCS. This is some way off with the Provisional Programme on the Council's website advising that the next round of consultation will not take place until Quarter 4 2019 with submission to the Secretary of State towards the end of 2020¹.
- 1.5 In addition, it is understood that the affordability of homes within the Marlborough Area is a significant issue. The delivery of affordable homes is in large part reliant on the delivery of additional residential development. Thus, without the delivery of further residential

¹ <http://www.wiltshire.gov.uk/planning-policy-local-plan-review> [accessed 06.03.2019]

development in the Marlborough Area, much needed affordable housing will not be forthcoming.

- 1.6 It is noted that the majority of the housing requirement in the Marlborough Area, as identified in the WCS, was completed prior to adoption of the WCS (Table 5.8 advises of 456 completions between 2006 and 2014 against a target of 920 with a further 70 homes benefitting from planning permission). The remaining requirement was to be met through a strategic allocation for 220 homes with a residual requirement for 174 homes. The WCS aimed for '*sustainable and measured growth throughout the plan period*' in the Marlborough Area (page 123). However, the majority of new homes were delivered prior to the adoption of the WCS with the remainder now committed/ completed (Proposed Changes Annex A, July 2018; reference PC18).
- 1.7 There is, therefore a case on affordability alone for the provision of additional homes in the Marlborough Area as well as merit in further allocations in response to as yet unquantified current levels of housing need.
- 1.8 The emerging Neighbourhood Plan is seeking to address this issue and the WHSAP should be clear that further allocations and amendments to settlement boundaries can be brought forward through neighbourhood plans and at Marlborough in particular, and that this should be in addition to the supply identified in the WHSAP.
- 1.9 The Marlborough Area was designated as a Neighbourhood Area in 2016. The Marlborough Area Neighbourhood Plan ('MANP') is being prepared by the MANP Steering Group which is currently assembling the evidence base. This may well identify housing and other needs within the Marlborough Area that are not reflected in WCS or WHSAP. It is clear from the information published by the MANP Steering Group to date that additional development will be required in Marlborough to meet the needs of the community now and in to the future to provide for the long-term sustainability of the settlement and surrounding area.
- 1.10 In attributing housing growth to other settlements, the WHSAP assumes that additional housing need generated from Marlborough (both market and affordable) will be met elsewhere. This conflicts with the objective of the NPPF that sufficient land for housing comes forward '*where it is needed*' (paragraph 59). Moreover, to promote sustainable development, the NPPF considers that planning policies should identify opportunities for settlements to grow and thrive (paragraph 78).
- 1.11 In summary, the WHSAP is based on the WCS, the housing needs of which are out of date and expressed as minima in any event. The review of the WCS has been delayed. Whilst the Marlborough Area has almost met its WCS requirement, there is a need to provide for further housing in advance of the review of the WCS, not least to meet local needs in particular for affordable housing. The emerging MANP provides a platform for the identification of such needs and, indeed, the allocation of additional land and review of the settlement boundary.
- 1.12 The WHSAP should be clear as to the relationship to emerging Neighbourhood Plans and should expressly provide for additional housing to be provided through Neighbourhood Plans and the attendant review of settlement boundaries.

BARTON WILLMORE

8 March 2019