

Gladman Hearing Statement
Wiltshire Housing Site Allocations Plan (WHSAP)
Examination

Matter 2: Consistency with the Wiltshire Core Strategy (WCS)



March 2019

MATTER 2: CONSISTENCY WITH THE WILTSHIRE CORE STRATEGY

Issue 2: Does the WHSAP make adequate provision to meet housing requirements as set out in the WCS?

2.1 The WCS contains housing figures at a County, HMA and settlement level. Which is the most appropriate scale at which to consider provision in order to assess consistency with the WCS?

- 2.1.1 It is firstly important to note that the WCS was submitted for examination in July 2012 and adopted in January 2015. It is now at a stage that it has just seven years left to run. The WCS makes reference to a planned early review of the WCS, which is a position that was reflected within the Inspector's Report and clearly influenced the conclusions that were reached. The Local Plan Review was predicated on the finalisation of the Swindon and Wiltshire Strategic Housing Market Assessment (SHMA) which was subsequently completed and published in early 2017. Despite this, the Local Plan Review has yet to reach an advanced stage and it is of paramount importance that this is progressed in a timely manner.
- 2.1.2 The figures contained within the WCS at all levels are material to the process of preparing the WHSAP and will need to be taken into account when assessing consistency. The figures contained in the WCS provide the mechanism by which site options should be considered and distributed. This process will need to take a positive approach, recognising that the overall Wiltshire and HMA requirements are expressed as a minimum and the requirements for settlements are indicative.
- 2.1.3 Paragraph 4.33 of the WCS indicates that the housing market areas (HMAs) form the appropriate scale for disaggregation across Wiltshire, as they define areas within which the majority of household moves take place. This is therefore the basis of the five year housing land supply calculations. Gladman agree that this approach will need to be continued through the WHSAP to ensure consistency with the WCS. The Local Plan Review process will however need to give consideration to whether this will remain an appropriate approach moving forward.
- 2.1.4 Paragraph 4.33 of the WCS also discusses the more localised 'community area' and 'settlement level' requirements contained within the WCS, with paragraph 4.34 going on to explain that they are intended to be a material consideration to ensure that delivery is distributed broadly in line with the strategy. The WCS indicates that the figures at the HMA and settlement level are required in order to ensure an appropriate distribution of housing across Wiltshire that supports the most sustainable pattern of growth, indicative requirements are also provided at a 'community area' and 'settlement level' within the WCS.

- 2.1.5 The rationale behind the 'indicative' figures in the WCS is to ensure that a positive approach is taken which might otherwise prevent sustainable development proposals from coming forward to contribute to land supply. This approach must therefore be taken forward through the WHSAP and Neighbourhood Plans. Paragraph 4.33 of the WCS states:

“The indicative figures also allow a flexible approach which will allow the council, including through the preparation of the Sites Allocation DPD and local communities preparing neighbourhood plans, to respond positively to opportunities without being inhibited by an overly prescriptive, rigid approach which might otherwise prevent sustainable development proposals that can contribute to maintaining a deliverable five year housing land supply and delivering the strategic objectives of the plan.”

- 2.1.6 Gladman are of the view that the indicative nature of the community area and settlement level requirements means that reasonable alternatives in all locations should be fully explored through the WHSAP plan making process. In addition, care must be taken to ensure that positive policies and site allocations are put in place to enable development to come forward in locations across the settlement hierarchy to meet the indicative requirement figures in full and exceed them where it would be sustainable to do so. It is noted that there are a number of locations where the indicative figure will not be achieved through completions, commitments and proposed allocations over the 2006 to 2026 period. Paragraph 4.33 of the WCS makes clear that sustainable development within the limits of development or at Small Villages should not be constrained just because requirements have been reached. Equally, the consideration of site allocations and new settlement boundaries for settlements through the WHSAP should not now be constrained because indicative requirements have been met.

2.2 Based on the most up to date evidence, what is the residual level of development required to meet the housing requirement identified in the WCS? What component of this is the WHSAP expected to meet?

- 2.2.1 The Council has set out its most recent position within Topic Paper 4: Developing Plan Proposals Addendum, July 2018. The WHSAP will need to ensure that sufficient land is allocated to enable the minimum requirements to be met in full over the plan period. This will require the inclusion of a suitable contingency to reflect evidence of the likely 10-20% 'drop out' rate (as set out in Gladman's previous representations on the WHSAP).

2.3 Are the components of delivery identified in the Plan, including completions, committed developments and windfalls, justified and realistic?

2.3.1 The Plan does not provide a breakdown of the components of delivery through the inclusion of a housing trajectory. The inclusion of a trajectory would ensure transparency and provide a new baseline for the monitoring process. Table 4.1 of the WHSAP does however provide a summary position, which calculates the extent of completions and developable commitments against the three HMA requirements and sets out a minimum number to be allocated. The developable commitments must however be seen as representing a 'snapshot in time' in terms of the extent of developable commitments over the remainder of the plan period 2017-2026.

2.3.2 Furthermore, notwithstanding the transitional arrangements for the examination of local plans that is set out in Annex 1 of the NPPF (February 2019), the assessment of housing supply in decision making on planning applications must now have regard to the revised definition of 'deliverable' set out in the most recent NPPF. This indicates that sites without planning permission should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years. This must therefore be taken into account when considering the likelihood that a five year housing land supply can be maintained over the remainder of the plan period.

2.4 In light of the above, does the WHSAP make adequate overall provision to ensure the delivery of the minimum housing requirement as set out in the WCS?

2.4.1 No, there remains uncertainty with regard to deliverability across all components of supply. There is also uncertainty as to whether the indicative requirements for individual areas will be achieved in a manner that is consistent with the spatial strategy. A suitable amount of headroom (of between 10% and 20%) is therefore required within the allocations to demonstrate that the minimum requirement will be delivered and ensure that the plan is both effective and positively-prepared. Failure to provide this would represent a failure to recognise that, in reality, some sites will not come forward at all or at the rate envisaged.

2.5 Is the predicted delivery of allocated sites realistic in terms of the contribution they would make through the Plan period?

2.5.1 No, there remains uncertainty with regard to deliverability across all components of supply. Also, as indicated in 2.3.2 above, consideration will need to be given to the revised definition of the 'deliverable test' in the context of the local planning authority's decision-taking on planning applications.

Issue 3: Does the distribution of site allocations accord with the spatial strategy in the WCS?**3.1 Is the overall distribution of housing allocations consistent with the spatial strategy set out in the WCS?**

3.1.1 No, as indicated above, there are a number of settlements that will not achieve the indicative requirement that has been set out in the WCS. Furthermore, the WCS does not place a limit on the development that the WHSAP should direct to settlements across the hierarchy and therefore a positive approach should be taken towards considering all options for housing growth that, if allocated, would still maintain a broad consistency with the spatial strategy/distribution strategy that is set out in the WCS.

3.3 Is the approach set out in Stages 1 and 2 of the site selection process justified? In particular, has a consistent and justified approach been taken to excluding specific locations from the scope of the exercise, including: • Principal Settlements, Market Towns, Local Service Centres and Large Villages; • areas where housing needs in the WCS are indicated to have been met; and 3 • areas with made or emerging Neighbourhood Plans? (* Note, in responding to this question, the Council is requested to provide an up to date assessment of the stage each relevant Neighbourhood Plan is at in its preparation).

3.3.1 No, there is no justification for the exclusion of site options from further consideration in circumstances where the housing needs of the WCS are indicated to have been met. A rigid approach has been taken by the Council through its site selection process in a manner that is contrary to the approach set out in the WCS, which makes clear at paragraph 4.33 that:

“The indicative figures also allow a flexible approach which will allow the council, including through the preparation of the Sites Allocation DPD and local communities preparing neighbourhood plans, to respond positively to opportunities without being inhibited by an overly prescriptive, rigid approach which might otherwise prevent sustainable development proposals that can contribute to maintaining a deliverable five year housing land supply and delivering the strategic objectives of the plan.”

3.3.2 Gladman are promoting a number of sites through the plan making process in Wiltshire and contend that they represent sustainable options for growth over the remainder of the 2006-2026 plan period. As such, they should be fully considered as options through the WHSAP and not arbitrarily discounted from consideration.

Issue 4: Has the site selection process for housing allocations been soundly based?**4.1 Were reasonable alternatives considered and tested? Are the reasons for selecting the preferred sites and rejecting others clear?**

- 4.1.1 It is important that the sites that have been proposed for allocation have been selected against possible alternatives using a robust and objective process. The exclusion of site options as a result of the rigid application of the indicative requirements set out in the WCS calls the soundness of the process into question.