



Wiltshire Housing Site Allocations Plan Examination

Matter 2 – Consistency with the Wiltshire Core Strategy

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The response to the questions raised in the Inspector's Initial Matters, Issues and Questions (MIQs) to the Council dated 8th February 2018 are set out below. Please note that the observations made in this paper should be read in conjunction with the letters dated 7th March 2019, 6th November 2018 and 21st September 2017.

The numbering system used corresponds with the numbers attached to each question in the Inspectors MIQ's.

Any reference to the Site Allocations Plan (SAP) includes the Main Modifications.

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

Q 2.1 The Core Strategy (CS) provides the structured 'framework' for the Site Allocations Plan (SAP). The figures at a County level, HMA and Community Area (CA)/settlement level all have relevance noting that the key objectives of the SAP are to ensure that Wiltshire has an adequate five year housing land supply (currently assessed on an HMA level) and that the level of growth identified in the Core Strategy (at least 42,000 homes across the County) are distributed in such a way that local needs are met (CA/settlement level).

As stated in the guidance note published by the Inspector leading up to the hearing sessions, it is not within the scope of the Examination to re-open discussion on matters and issues relating to the plan period, objectively assessed housing need and the housing requirement. On that basis, key matters that are already 'fixed' in terms of understanding the levels of growth required whether it be at a County, HMA or CA/settlement level and which the SAP will have to have regard to, are i) the overall housing requirement which, as stated in the CS at Policy 2, is at least 42,000 homes; ii) defined (but again indicative) levels of growth to each HMA; and ii) the allocation of defined but 'indicative' levels of housing/employment to Community Areas (CA) identified in the CS.

It is also set out in the CS that within each CA there should be a 'split' between the major urban settlement (that is the focus for development in a particular area) and the surrounding rural areas in terms of the amount of housing to be provided. Again, these figures are indicative. The CS identifies a certain level of growth for both. It is at this point that consideration needs to be given to as to how housing is being delivered as clearly there is a close relationship between the two i.e. the urban centre and neighbouring settlements. Where there has been a failure to deliver housing in either an urban centre or rural area within a CA (for whatever reason) then consideration must be given as to how the housing needs of the CA as a whole are best met.

The CS states at para. 4.20 that the flexible approach adopted by the CS will allow the Council, when preparing the Site Allocations Plan (and when other plans are being prepared) *“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 delivering the strategic objectives of the plan.”* In our view there is sufficient flexibility in the ‘structured’ approach provided by the CS to ensure that the spatial strategy is met and the housing requirement delivered but in order for this to happen the SAP needs to adopt i) a positive approach to the delivery of housing; and ii) have no hesitation in delivering housing particularly where this a risk, no matter how slight, that some sites may not deliver. This point is particularly relevant to Trowbridge (see Q 3.1 of this paper).

Q 2.2 The most up to date evidence relating to the residual amount of development required to meet the housing requirement needs to be confirmed by the Council. As set out above in 2.1, the SAP itself goes through a process of confirming the indicative housing requirement as set out in the CS disaggregated to the CA’s in each HMA (see para. 2.17). In order to understand the residual requirement, Table 4.10 of the SAP identifies the requirement but factors in commitments and completions to leave a residual figure. This is the minimum requirement as set out in the submission version of the SAP.

However, since the SAP was submitted, the Council has undertaken further work on establishing how much housing needs to be provided within the context of the SAP. We are aware of the Community Area Topic Papers published in July 2018 having been updated to September 2018. These papers cross reference with the Housing Land Supply Paper Addendum July 2018 and contain tables updating the figures set out in the SAP relating to i) the indicative housing requirement, ii) completions (2006 to 2017); iii) developable commitments (2017 to 2026) and iv) the indicative residual requirement. We note that a windfall allowance is identified at the HMA level but as far as we are aware this has not been broken down to the CA level. This is important as it provides a clear indication of whether the Council is being overambitious or unrealistic with its assumptions regarding the allowance and hence exactly how much land is required to be allocated. It is also relevant to consider a non-implementation rate – again this gives greater certainty to the amount of land to be allocated.

One important point to make is that para. 14 of the NPPF requires that *“Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.”* In the context of both windfall sites and sites with planning permission that contribute to the supply, there is potential for delay notwithstanding any significant level of assurance given by the Council/landowners/developers that sites will come forward. We note the Council is seeking an introduction of a buffer but that MUST be sufficient otherwise there will be issues regarding i) meeting local housing needs in a timely manner and ii) ensuring the Council has an adequate 5 year housing land supply. This matter must be examined carefully. In relation to the application recently submitted on behalf of our Client for the site at North Bradley part of the application submission includes a Housing Land Supply Statement. This confirms that, at present, a five-year housing land supply cannot be demonstrated in the North and West Housing Market Area. We consider that there is sufficient flexibility in the CS noting that there is much reference to indicative figures to allow for a robust approach to be taken to the delivery of housing particularly where there are doubts regarding delivery.

Q 2.3, 2.4 and 2.5 - See 2.1 and 2.2 above and previous submissions.

Issue 3: Does the distribution of site allocations accord with the spatial strategy in the WCS?

Q 3.1 The Council has identified a series of housing allocations within each HMA and subsequent CA’s. This follows the spatial requirements for delivering housing as set out in the CS. To that effect the SAP is consistent with the CS. The key question is whether sufficient flexibility has been built into the SAP in terms of sites being identified within each CA (whether in urban/rural locations) so as to ensure the needs of the CA as a whole are being met.

The above point is particularly relevant to Trowbridge. It is the county town and is identified as being one of three key settlements (Principal Town) to which growth should be focussed. As it states at para. 4.19 *"The underlying principles of the Delivery Strategy are to ensure that communities have a better balance of jobs, services and facilities and homes. This underlines the focus of the Settlement Strategy to support growth at the Principal Settlements of Chippenham, Trowbridge and Salisbury which provides the greatest opportunities within Wiltshire to deliver improved self containment and potential to generate job growth."*

However, as pointed out in the SAP, at para. 4.46 *"Growth at Chippenham and Trowbridge has not matched expectations. Land has been in short supply or delayed in coming forward. As Principal Settlements within the HMA they are intended to be the primary focus for development, providing significant levels of jobs and homes."* It is most telling that at para. 4.52 the Council confirms that even with six new allocations proposed, the indicative housing requirement may not be met. At para. 4.53 the SAP explains the difficulties in the delivery at Ashton Park which is a strategic allocation identified in the CS. Para. 4.64 highlights significant constraints that are hampering delivery. At para. 4.56 the SAP provides a justification for the approach being taken regarding delivering sufficient sites to meet the needs of Trowbridge.

Noting the above there are two key points to make that are relevant to answering Q 2.1. First, that it is not acceptable for there to be any question as to whether there should be a lower provision of housing at Trowbridge. It is confirmed in the CS as being a key focus for growth in the County. The key figures show an 18% deficit against the indicative housing requirement in the original submitted version of the SAP (Table 4.10). This Table has subsequently been updated in the Trowbridge Community Area Topic Paper (see Tables 2.2 and 2.3) but there is still a significant residual requirement. Indeed, the residual requirement has increased to 19% as set out in amended Table 4.10.

Whilst the Council refers to a flexible approach this is being taken in the context of reducing levels of housing which have been demonstrated as being needed and focussed at Trowbridge. The approach that the Council is taking is in direct conflict with i) the CS which is seeking a housing requirement figure of 'at least' 42,000 units ii) the Government's objective of boosting the supply of housing; and iii) the SAP itself which states at para. 4.3 that *"In order to deliver the spatial strategy, the priority for housing land allocations has been to focus on those higher tier settlements that have not yet met or contributed towards indicative levels of provision (Principal Settlements, Market Towns and Local Service Centres). This supports the sustainable development of the County sought by Objective 2 of the Plan."*

The second key point is that there are 'indicative levels' of housing at a County, HMA and CA/settlement level. The figures are not "prescriptive" and should not be viewed as being "inflexible". The CS has been prepared using these figures and a structured approach agreed. This is appropriate so as to allow for local needs to be met. However, at the CA level there must be flexibility in delivery particularly where a site in a village close to an urban centre that can be demonstrated as being sustainable can make up a potential shortfall in the urban area. In the Trowbridge CA this is also happening in that there are proposed allocations sitting within the neighbouring parish of North Bradley Parish. Yet it is relevant to note that the SAP states that no further allocations are required as the residual area target has been met. Paragraph 2.14 of the Community Area Topic Paper for Trowbridge (update September 2018) states that *"The Large Villages in the community area have already delivered more than was expected and hence there is no need to look at these areas for the purpose of allocating land for housing."* There is a contradiction here that needs to be resolved.

Q 3.2 - As 3.1 above and previous submissions.

Q 3.3 We have two comments to make. First, in terms of the Areas of Search the Table at 4.2 suggests that only Trowbridge was considered as being an area that should accommodate housing. The Trowbridge CA remainder was not included. However as stated elsewhere in this paper, the Council has sought to meet the needs of Trowbridge through identifying sites that sit within neighbouring parishes i.e. North Bradley. The actions of identifying sites in such locations conflicts with the

statements made in the SAP. Second, we do not understand the observations made at para. 4.9. If the Council is suggesting that any site other than those included in the SHLAA were automatically discounted what was the purpose of the consultation exercise in summer 2017? If a site comes forward outside the scope of the SHLAA performs better than one that is included then surely it is incumbent on the Council to give it due consideration and include it as an allocation. We have submitted our site to the Council under this process, but we understand that it has yet to be assessed. That though is not a reason for not giving it consideration.

Q 3.4 – As 3.1 and 3.3 above and previous submissions.

Issue 4: Has the site selection process for housing allocations been soundly based?

4.1 to 4.6 - We have no comments to make other than i) it is for the Council to clearly demonstrate that the site selection process has been undertaken in a robust manner; and ii) we are concerned that the Council may have automatically discounted sites that may perform as well or even better than those already identified to be allocated – see Q 3.3 above.

7th March 2019