

WILTSHIRE HOUSING SITE ALLOCATIONS PLAN (WHSAP) EXAMINATION

MATTER 2:

CONSISTENCY WITH THE WILTSHIRE CORE STRATEGY (WCS)

ON BEHALF OF: LONGFORD ESTATES

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2. 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 Core Policy 1 sets out the settlement strategy and identifies the different tiers of settlements based on the understanding of the role and function. The settlement strategy is then coupled with the Delivery Strategy in Core Policy 2 which seeks to deliver development across Wiltshire in the plan period according to the HMAs.

2.1.2 The WCS Inspector identified that there was a need for 44,000 homes across Wiltshire (paragraph 78 of Inspectors Report). However, the Inspector found a requirement of 42,000 homes to be sound as this would provide a significant boost whilst being achievable (paragraph 80) and that this would be reviewed by a SHMA in early 2016 (paragraph 81).

2.1.3 Core Policy 2 of the WCS provides the minimum housing requirement for each HMA, which provides for a minimum of 41,100 homes with an additional 900 at the West of Swindon (totalling 42,000);but enables some flexibility within each HMA e.g. as set out in paragraph 4.34.

2.1.4 Paragraph 4.20 of the adopted Core Strategy states that Wiltshire's proposed housing requirement is set out against defined sub county areas as identified in the SHMA i.e. East Wiltshire, North and West Wiltshire and South Wiltshire HMA. **It is therefore necessary that these are met or exceeded as a minimum.**

2.1.5 Whilst it is noted that it is not the purpose of this examination to re-open any discussions on matters that were considered at the examination of the WCS nevertheless as the Council consider that they can demonstrate in excess of the OAN (44,000 dwellings) they are obliged by the NPPF 2012 to have a housing requirement that reflects this figure (ref paragraph 47).

2.1.6 The new SHMA (2017) published to inform the review of their local plans including the preparation of a non-statutory Joint Spatial Framework to enable each plan period to be extended to 2026 has identified that the need is 43,247 dwellings i.e. in excess of Core Policy 2. Similarly, although not relevant for

- the purpose of this examination it remains material that the standard method identifies a need for 44,805 homes.
- 2.1.7 Therefore, whilst the need has remained broadly consistent (44,000 to 43,247 to 44,805), the constraint which was found sound by the WCS Inspector is no longer justifiable. As an inevitable result, Core Policy 2 is out-of-date such that if this is not reviewed all planning applications will be considered in the context of the 'tilted balance'.
- 2.1.8 As the need has already been established through the WCS examination, and it is only the constraint which is out-of-date, it is unnecessary to consider this in detail. The minimum housing requirement should simply be 44,000 to accord with paragraphs 14 and 47 of the former NPPF under which this plan is being examined.
- 2.1.9 Table 1 of the WCS provides indicative requirements for each Community Area (CA) and each sub-CA area. Paragraph 4.20 identifies that these allow a flexible approach which will allow the Council to respond positively to opportunities through the WHSAP.
- 2.1.10 Paragraph 4.30 indicates that these indicative requirements are not intended to be so prescriptive as to be inflexible or ineffective, and that they provide the framework for the WHSAP.
- 2.1.11 Paragraph 4.33 identifies that they provide for an appropriate distribution of housing and the most sustainable pattern of growth. Paragraph 4.33 states that the housing market areas from the appropriate scale for disaggregation across Wiltshire. Indicative requirements are then provided for each Community Area within each HMA.
- 2.1.12 However, paragraph 4.34 goes on to identify that it would be appropriate for the supply in one sub-CA area to contribute to the requirements of another within the same HMA but that it would be wholly inappropriate for the entirety of the indicative requirement to be met within another sub-CA area.
- 2.1.13 Therefore, the minimum requirement for each HMA must be met ideally in accordance with the indicative sub-CA requirements, but there is some flexibility for these to be met elsewhere, where for example, there is

insufficient capacity providing the broad spatial strategy is accorded with (addressed under Issue 3).

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 Annex A in the Proposed Changes (EXAM01) PC15 indicates that if all the sites deliver as anticipated then there is a surplus in all the HMAs. This occurs providing the sites deliver as anticipated by the Council (see below). There is sufficient capacity to exceed the minimum out-of-date housing requirements in the East HMA and the North and West HMA.

2.2.2 The method for calculating the windfall allowance in Wiltshire was considered through the WCS examination and it is specified on page 421 of the WCS. The Council has however chosen to adopt a different windfall allowance which is contrary to the WCS in the interim to produce the figure for South Wiltshire, North and West Wiltshire and East Wiltshire.

2.2.3 The Housing Land Supply April 2014 (published July 2014) provides the windfall figures which accord with the method specified in the WCS and produces a small site windfall allowance.

- For South Wiltshire HMA of only 340 homes in 9 years with an additional large site windfall allowance of 91 homes.
- For North and West Wiltshire HMA, 889 homes from 2017 – 2026 with an additional large site allowance of 220 dwellings.
- For East Wiltshire HMA, 180 homes from 2017 – 2026 with an additional large site allowance of 53 dwellings.

2.2.4 These figures are significantly difference than those proposed in the Housing Site Allocations DPD in PC 15 Table 4.7

2.2.5 Furthermore, it should be noted that the large site windfalls will double count the allocations in the WHSAP, as they are large sites which would previously have come forward, but which should now be allocated in the WHSAP. As a result, the large site windfall allowance should no longer be relied upon.

2.2.6 Whilst there is sufficient capacity across East Wiltshire HMA and North and West Wiltshire HMA to meet the minimum out-of-date housing requirements of the WCS if the Council's trajectory is achieved (see below), this will not be in

- accordance with the spatial strategy (addressed under Issue 3) as there is a significant difference between the indicative housing requirement for sub-areas and that which is planned to occur.
- 2.2.7 For example, there are significant shortfalls in three of the higher order settlements in the North and West Wiltshire HMA namely Chippenham Town (264), Trowbridge Town (1,297) and Warminster Town (165).
- 2.2.8 The WHSAP proposes that it is appropriate to meet these indicative requirements (which themselves do not meet needs) in other sub-areas which may result in a fundamentally different spatial strategy, although this may be necessary if the indicative requirements cannot be met.
- 2.2.9 Table C1 of the WCS indicates that the WHSAP and neighbourhood plan allocations are expected as a minimum to address the full shortfall which arises once the windfall allowance of the WCS has been applied.
- 2.2.10 In South Wiltshire HMA, Table 4.7 of Annex A to WHSAP 03.01 indicates that there have been 5,388 completions, there are 3,701 commitments and 804 are proposed on allocations. This provides a total of 9,893. The windfall allowance specified in the WCS provides for an additional 340 homes producing a total of 10,233 homes as compared to the minimum requirement for 10,420.
- 2.2.11 It is therefore necessary as a minimum for an **additional 187 homes to be identified** on additional allocations within South Wiltshire HMA which are capable of delivery within the plan period.
- 2.2.12 For North and West Wiltshire HMA even with the reduced windfall allowance applied, there is a surplus against the housing requirement. The deliverability of this surplus can be questioned as some of the sites have not come forward as envisaged e.g. sites at Trowbridge, however, a key issue in the consideration of this plan is that the WCS will become out of date in January 2020, and consequently if the Housing Site Allocations Plan is adopted later this year it will have a housing requirement that will shortly be out of date.
- 2.2.13 It is therefore considered that the housing requirement should be amended to reflect the WCS Inspector's view, *"Overall, the balance of evidence suggests that the objectively assessed housing need, to be disaggregated across the*

three Wiltshire HMAs, is currently in the region of 44,000 dwellings over the plan period."

- 2.2.14 We have set out in our representations to the Pre-Submission Draft Plan in September 2017 why there can be no reason for not meeting the full OAN as required in paragraph 47 of the NPPF 2012. The Housing Site Allocations Plan should therefore seek to deliver the OAN of 44,000 dwellings, such an approach would be wholly consistent with the housing requirement of the Core Strategy which requires the delivery of at least 42,000 dwellings.

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

2.3.1 The WHSAP is being examined in the context of the former NPPF as such any finding on the five-year land supply which is reached in the context of the examination will not apply for decision-taking purposes either before or after adoption. This should be made explicit in the Inspectors report;

2.3.2 However, if the Inspector wants to consider this on the basis of the current NPPF (which will apply to decision-taking) as well as the former NPPF (which applies for the examination), a summary response is provided below.

Plan period supply in South Wiltshire

2.3.3 As identified previously, even based on the trajectory of the Council there is a plan period shortfall in South Wiltshire. Once the windfall allowance of the WCS is applied there is capacity for 10,234 homes as compared to the minimum requirement for 10,420;

2.3.4 However, at the recent Alderbury inquiry, the Inspector agreed with Pegasus Group that the contribution from certain sources of supply would be even less;

2.3.5 The Council accepted that the site at Bulbridge was not deliverable and given the extensive record of non-delivery at this site it should not be considered developable. This would increase the shortfall by 45 homes;

2.3.6 The Inspector agreed that as a result of the delays which have already occurred at Fugglestone Red and Kings Gate, the contributions from these sites should also be reduced. Across the plan period, this would reduce the supply by 257 homes and 215 homes respectively;

2.3.7 In total taking account of only those sites which the Alderbury Inspector found it necessary to consider, the maximum plan period supply of the Council in South Wiltshire is 9,717 which represents a shortfall of 703 homes compared to the minimum housing requirement (which itself does not reflect the need);

2.3.8 Therefore, in order to meet the minimum out-of-date housing requirement, it is necessary to make additional allocations providing at least 703 homes in South Wiltshire.

Five-year supply in South Wiltshire

2.3.9 The shortfall in South Wiltshire HMA needs to be addressed urgently as the latest Inspector who has considered this matter in South Wiltshire HMA has concluded that the Council is already unable to demonstrate a five-year land supply. Whilst the Inspector was not explicit based on his findings on the use of the Sedgfield approach, the windfall allowance, Fugglestone Red and Kings Gate, it can be calculated that he considered that there was a 4.3 year land supply with a shortfall of 446 homes.

2.3.10 This shortfall will need to be addressed by the proposed allocations:

- The sites at Clover Lane, Larkhill Road, Hilltop Way and The Yard are of a scale that they could realistically contribute to the deliverable supply providing clear evidence was provided that this will be achieved. However, these only provide 69 unpermitted homes in total which will reduce the shortfall to 377 homes;
- The other sites (Land at Netherhampton Road, North of Netherhampton Road and Rowbarrow) are all of such a scale that even following the submission of a planning application it would be expected that completions wouldn't be achieved for 4 years even if they weren't subject to the constraints identified in the emerging WHSAP.

2.3.11 Therefore, in order to restore a five-year land supply (even against the out-of-date minimum housing requirement) it will be necessary to allocate additional sites that can deliver early in South Wiltshire HMA.

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 It is considered for the reasons set out in our representations that the minimum housing requirement is no longer justified and it is out-of-date.

2.4.2 According to the Council's own figures and the findings of the most recent S78 Inspector, even against these minimum housing requirements, the WHSAP does not make adequate provision in South Wiltshire.

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 The Council has not prepared trajectories for these sites and so it is not possible to assess the realism of the trajectories assumed by the Council.

3. 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 Pegasus does not have any issues with the distribution of development which is in accordance with the strategy.

3.2 Is the distribution within each HMA consistent with the WCS?

3.2.1 No comments.

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**
- **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 comment.

3.4 Are the differences between overall provision identified in the WHSAP and the WCS justified? Should any shortfalls in provision within particular settlements be compensated for with development in other locations?

3.4.1 It is considered that there are alternative sites in and around Salisbury to help enable address the shortfall in that settlement. There is no requirement for compensation in other locations.

4. ISSUE 4: HAS THE SITE SELECTION PROCESS FOR HOUSING ALLOCATIONS BEEN SOUNDLY BASED?

4.1 Have the site allocations been undertaken on a consistent basis having regard to the strategic objectives and policies of the WCS, the policies of the NPPF and the evidence base?

4.1.1 The process may be soundly based, however Pegasus Group has provided early representations in relation to the application of the site selection process to Site ref. 3435 (Land off Britford Lane, Harnham) as errors and incorrect assumptions were made.

4.2 Were reasonable alternatives considered and tested? Are the reasons for selecting the preferred sites and rejecting others clear?

4.2.1 Pegasus has not made representations on the consideration of alternative sites and their assessment.

4.3 Have the site allocations been made in accordance with Diagrams 2 and 3 of the Planning Practice Guidance on Flood Risk and Coastal Change, including the application of the sequential and exception tests?

4.3.1 This is more of a matter for the Council.

4.4 Have the cumulative transport related implications of allocated sites been fully assessed and are measures to address them sufficiently clear and deliverable?

4.4.1 This is more of a matter for the Council.

4.5 Have the cumulative effects of development on protected habitats and species? Will the plan be effective in ensuring their protection and/or mitigating any effects?

4.5.1 This is more of a matter for the Council.

4.6 Have the cumulative infrastructure requirements of allocated sites been fully assessed, including the need for education facilities, and are measures to address them sufficiently clear and deliverable?

4.6.1 This is more of a matter for the Council.

