

Working towards a Core Strategy for Wiltshire

Topic paper 15: Housing requirement technical paper

Wiltshire Core Strategy Consultation January 2012



This paper is one of 16 topic papers, listed below, which form part of the evidence base in support of the emerging Wiltshire Core Strategy. These topic papers have been produced in order to present a coordinated view of some of the main evidence that has been considered in drafting the emerging Core Strategy. It is hoped that this will make it easier to understand how we have reached our conclusions. The papers are all available from the council website:

Topic Paper 1: Climate Change

- **Topic Paper 2: Housing**
- Topic Paper 3: Settlement Strategy
- Topic Paper 4: Rural Signposting Tool
- **Topic Paper 5: Natural Environment**
- Topic Paper 6: Retail
- Topic Paper 7: Economy
- **Topic Paper 8: Infrastructure and Planning Obligations**
- Topic Paper 9: Built and Historic Environment
- Topic Paper 10: Transport
- Topic Paper 11: Green Infrastructure
- **Topic Paper 12: Site Selection Process**
- Topic Paper 13: Military Issues
- Topic Paper 14: Building Resilient Communities
- Topic Paper 15: Housing Requirement Technical Paper
- Topic Paper 16: Gypsy and Travellers

Topic Paper 15: Housing Requirement Technical Paper

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Executive Summary

- ES.1 This paper sets out the progress made in determining an appropriate base requirement and distribution of housing for Wiltshire from 2006 to 2026 to inform the Wiltshire Local Plan. This process considers the strategic objectives for the county as well as taking into account local factors and aspirations for growth identified through community consultation.
- ES.2 The strategic housing requirement is assessed through this technical paper, an earlier version of which, the "Strategic Housing Requirement Technical Paper", was included as a supporting paper to the South Wiltshire Core Strategy Review (a review of the level of jobs and homes proposed within South Wiltshire in response to the intended revocation of Regional Spatial Strategies) which was approved at Full Council on 22 February 2011. The Technical Paper set out the methodology to determine Wiltshire's future housing requirements over the plan period 2006 to 2026. It also identified the requirement to be used in the review of the South Wiltshire Core Strategy. The strategic housing requirement for Wiltshire was assessed to lie within the range of 35,900 to 43,200 homes from 2006 to 2026, with 9,900 of these in south Wiltshire.
- ES.3 These figures were generated in response to the announcement on 27 May 2010 by the Secretary of State for the Department for Communities and Local Government (DCLG) confirming the Coalition Government's intention to 'rapidly abolish Regional Spatial Strategies (RSS)'.
- ES.4 This intention to revoke Regional Spatial Strategies (RSS) will mean that "Local Planning Authorities will be responsible for establishing the right level of local housing provision in their area, and identifying a long-term supply of housing land without the burden of regional targets."
- ES.5 Guidance issued by DCLG requires Local Authorities to justify future housing requirements and to ensure that such requirements can be defended during the Local Development Framework examination process.
- ES.6 In developing a housing requirement for Wiltshire it is critical that the process is transparent and that local people are able to understand the process.
- ES.7 Striking the balance between meeting the Wiltshire-wide strategic housing requirement to enable Wiltshire's communities to be more sustainable and enabling communities to understand and be more involved in the development of a local housing requirement is central to arriving at an appropriate level of supply for Wiltshire and its community areas. The proposed housing requirement ensures that the strategic needs of Wiltshire can be met in locations where development is supported by local communities.
- ES.8 Significant consultation has been undertaken, and evidence collated, by the former district councils and Wiltshire Council to determine how future housing growth could be accommodated in Wiltshire. This has been used as a basis to develop Wiltshire's housing requirements with the aim to achieve better alignment with local community views.
- ES.9 Wiltshire Council undertook a public consultation from October until December 2009 on the document Wiltshire 2026: Planning for Wiltshire's Future. This document, although based on housing targets identified in the draft RSS for the south west Proposed Modifications version, proposed a distribution of development for the county, excluding South Wiltshire¹ at both town and community area level.

¹ A Core Strategy has been prepared for South Wiltshire, which included a separate consultation with communities.

- ES.10 Since the publication of the first version of this technical paper in February 2011, the Council undertook a series of consultation events hosted by the Community Area Boards. This bottomup approach compliments the technical paper assessment and ensures that the needs of the area are identified at the local level within a clear strategic framework, enabling communities to inform the development of local housing requirements.
- ES.11 The purpose of the Community Area meetings was two-fold. Firstly, the meetings provided the opportunity to update community areas on the proposals of the Localism Bill and emerging national planning policy; secondly, the consultations allowed an update to be given to each community area on the progress of the Local Plan and to ask whether or not, despite the intended revocation of the RSS, the proposals contained within Wiltshire 2026 were appropriate, and if not, encourage discussion on what an appropriate housing requirement would be and which factors should help determine this.
- ES.12 This bottom-up or community-led exercise represents an important contribution in the preparation of planning policies and the refinement of housing requirements for individual community areas and therefore Wiltshire as a whole.
- ES.13 From the Wiltshire 2026 consultation responses and the recent community consultation events a number of key themes emerged. These issues have been addressed through the development of appropriate policies within the Local Plan (including any subsequent Neighbourhood Plans or Development Plan Documents) and can be summarised as follows:

• The need to ensure balanced growth; communities considered that housing development is being front loaded, a view which aligns with evidence. Significant numbers of completions have taken place since 2006 as well as new commitments coming forward ahead of any growth in jobs and / or infrastructure necessary to support it. It was considered that further growth should be appropriately phased.

• The need for employment to come forward in advance of housing to address existing imbalances and help work towards self-containment of settlements.

• Communities acknowledged that the affordability of housing is a major concern across the county.

• Recognition that appropriate development can bring forward infrastructure improvements.

• The need to ensure that the appropriate infrastructure is provided in the right place at the right time.

- ES.14 Local communities were given the opportunity to discuss the appropriate scale of housing provision within their area. The comments received from these events along with other evidence were used to determine the overall housing requirement for consideration as part of the summer 2011 public consultation. Table ES1 summarises the resulting figures, which are justified in Appendix 4.
- ES.15 The overall requirement for South Wiltshire was developed through the technical paper, but the housing distribution for this area has been developed through the South Wiltshire Core Strategy Review and was consulted on and examined as a separate process. The South Wiltshire Core Strategy was subject to a second set of public hearings in August 2011. The Inspector concluded that the South Wiltshire Core Strategy was sound, and thereby supported the housing requirement for this area.
- ES.16 The resulting figures for South Wiltshire are included for completeness and comparison purposes. Table ES1 also includes additional information to help to understand how many homes have already been built or are committed and how many additional homes should be

planned for through the Local Plan. The Wiltshire 2026 figures are included for comparative purposes. The table headings are defined as follows.

(i) Wiltshire 2026 : Minimum scale of new homes proposed in Wiltshire 2026

(ii) Proposed requirement 2006-2026 : Minimum scale of new homes proposed in the emerging Local Plan

(iii)South Wiltshire Core Strategy Review : Minimum scale of new homes proposed in the South Wiltshire Core Strategy review 2006 to 2026

(iv)Completions: New homes delivered from 2006 to 2010.

(v) Specific permitted sites: Developable² permitted housing sites (including those subject to a S106 agreement) at April 2010. This also includes Local Plan allocations proposed to be carried forward into the Local Plan and a number of other specific sites.

(vi)Proposed Strategic Sites for the Local Plan: these are being proposed to meet specific strategic needs within a number of settlements.

(vii) Remainder to be identified: identifies the number of dwellings to be identified through other sources including neighbourhood plans, or site allocation DPDs and windfall in order to meet the minimum of the requirement.

Table ES1 - Proposed housing requirements including completions, commitments and proposed strategic sites (net additional homes)

		Homes built or planned	already	New homes to be planne for		
Area	(i)Wiltshir e 2026	(ii)Propose d requireme nt 2006 to 26	(iv)Completio ns 2006 to 11	(v)Specifi c permitted sites	(vi)Propose d Strategic Sites	(vii)Remaind er to be identified
Bradford- on-Avon town	490	510	170	160	150	30
Bradford- on-Avon remainder	130	160	70	20	0	70
Bradford- on-Avon CA	620	670	240	180	150	90
Calne town	1,140	1,240	420	430	0	390
Calne remainder	130	140	70	40	0	40
Calne CA	1,270	1,380	480	470	0	430
Chippenha m town	5,230	4,000	850	410 ³	2,250	480
Chippenha m remainder	510	500	130	100	0	270
Chippenha m CA	5,740	4,500	980	510	2,250	750
Corsham town	950	1,050	470	110	0	470

² In line with PPS3 to be considered developable, sites should be in a suitable location for housing development, and there should be a reasonable prospect that the site is available for development and could be developed at the point envisaged.

³ This includes the Chippenham Vision Sites

			Homes built or already planned		New homes to be planned for	
Area	(i)Wiltshir e 2026	(ii)Propose d requireme nt 2006 to 26	(iv)Completio ns 2006 to 11	(v)Specifi c permitted sites	(vi)Propose d Strategic Sites	(vii)Remaind er to be identified
Corsham remainder	110	150	70	100 ⁴	0	0
Corsham						
CA	1,060	1,200	530	210	0	450
Devizes						
town	2,000	1,730	1,070	250	0	410
Devizes remainder	420	420	200	20	0	200
Devizes						
CA	2,420	2,150	1,270	270	0	610
Malmesbur y town	720	760	410	90	0	270
Malmesbur y remainder	390	440	210	80	0	140
Malmesbur y CA	1,110	1,200	620	170	0	410
Marlboroug h town	610	610	210	150	0	250
Marlboroug h remainder	240	240	80	20	0	140
Marlborou gh CA	850	850	290	170	0	400
Melksham town	1,930	1,930	470	870	0	600
Melksham remainder	110	110	40	30	0	30
Melksham	110	110		00	0	00
CA	2,040	2,040	510	900	0	630
Pewsey CA	520	600	200	120	0	290
Tidworth & Ludgershall	1,750	1,750	200	840	480	240
Tidworth remainder	150	150	70	10	0	70
Tidworth CA	1,900	1,900	270	850	480	310
Trowbridge town	5,660	5,860	1,340	1,840	2,650	40
Trowbridge remainder	260	140	90	60	0	0
Trowbridg e CA	5,920	6,000	1,430	1,900	2,650	20
Warminster	0,010		.,	.,	_,	
town	1,650	1,650	330	320	900	110

⁴ Royal Arthur is excluded from this figure as this is deemed to meet the needs for the whole HMA and so should not be assessed relative to a rural remainder

			Homes built or already planned		New homes t for	o be planned
Area	(i)Wiltshir e 2026	(ii)Propose d requireme nt 2006 to 26	(iv)Completio ns 2006 to 11	(v)Specifi c permitted sites	(vi)Propose d Strategic Sites	(vii)Remaind er to be identified
Warminster remainder	120	120	60	30	0	30
Warminster CA	1,770	1,770	390	350	900	140
Westbury town	1,290	1,290	520	520	0	250
Westbury remainder	100	100	40	10	0	50
Westbury CA	1,390	1,390	550	530	0	300
Royal Wootton Bassett town	920	920	240	750	0	0
Royal Wootton Bassett & Cricklade remainder	330	330	160	50	0	120
Royal Wootton Bassett & Cricklade CA	1,250	1,250	400	800	0	50
West of Swindon	3,000	200	20	180	0	0
Wiltshire (excluding South Wiltshire)	30,860	27,100	8,180	7,610	6,430	4,690

NB Figures may not sum due to rounding

		-		New homes to be planned for	
	(iii)South Wiltshire Core Strategy Review	(iv)Completio ns 2006to11	(v)Specifi c permitted sites	(vi)Propose d Strategic Sites	(vii)Remaind er to be identified
Amesbury, Bulford & Durrington	2,100	650	380	1,300	0
Amesbury remainder	300	100	30	0	170
Amesbury CA	2,400	750	410	1,300	0
Mere town	200	90	30	0	80
Mere remainder	50	20	10	0	20

		Homes built or already planned		New homes to	to be planned
	(iii)South Wiltshire Core Strategy Review	(iv)Completio ns 2006to11	(v)Specifi c permitted sites	(vi)Propose d Strategic Sites	(vii)Remaind er to be identified
Mere CA	250	110	30	0	100
Salisbury City/Wilton town	6,060	980	790	3,950	350
Wilton remainder	220	80	40	0	100
Salisbury & Wilton CAs	6,280	1060	830	3950	440
Downton town	190	50	10	0	130
Southern remainder	370	140	60	0	170
Southern CA	560	190	70	0	300
Tisbury town	200	60	100	0	40
Tisbury remainder	220	40	20	0	170
Tisbury CA	420	100	110	0	210
South Wiltshire	9,900	2,310	1,460	5,250	1,000
Wiltshire	37,000	10,380	9,280	11,650	5,690

NB Figures may not sum due to rounding

- ES.18 The technical paper is supported by a Sustainability Appraisal (SA). The purpose of the SA is to assess the environmental, social and economic outcomes of delivery at either end of the strategic scale (35,900 to 43,200). The SA concluded that 'It is likely that in order to best achieve a balance between protecting and enhancing the environment and pursuing housing growth that will lead to significant social and economic benefits, a mid-range housing scenario should be pursued, provided there are strong links to Local Plan policies that will ensure housing growth is sustainable'. Whilst this is towards the lower end of the mid-range, it provides only the base housing requirement, and development beyond this figure will be supported, providing that it delivers appropriate infrastructure, and can be demonstrated to be sustainable. Indeed, given the opportunities for neighbourhood plans to bring forward additional housing, the housing requirement of 37,000 will ensure that the recommendations within the SA can be met. It should also be noted that in accordance with the draft National Planning Policy Framework, neighbourhood plans will be free to propose development in addition to that identified in the Local Plan.
- ES.19 The proposed requirement is 7,400 below the 44,400 requirement identified in the draft RSS. This difference is generally accounted for by reductions at Salisbury and Wilton (minus 2,770 dwellings), the West of Swindon (minus 2,800 dwellings) and Chippenham (minus 1,500 dwellings). It is however, some 3,000 in excess of that identified within the Wiltshire and Swindon Structure Plan 2016, the extant Development Plan. Therefore the future housing requirement is considered to be challenging, particularly given the rural nature of Wiltshire, and therefore appropriately responds to the step change in housing delivery sought by PPS3.
- ES.20 Delivery at the scale of 37,000 has been developed in conjunction with local communities, and conforms to the strategic requirements identified within the Technical Paper, which was

supported by the SA. This level of housing will support the projected employment growth, and will go some way toward addressing out-commuting.

- ES.21 The housing requirement has been developed reflecting the need to deliver jobs and new employment land and reflects evidence including views of communities to deliver more balanced growth over the plan period. The employment land requirement is generous and will ensure a flexible and responsive supply of appropriate sites and seeks to maximise the delivery of jobs to ensure balanced growth. The Local Plan should provide the right environment to encourage economic development and ensure that sufficient housing is delivered to support this, while recognising the potential for existing residents to change their place of work to within Wiltshire.
- ES.22 The need to identify a five year deliverable supply of housing land remains in place despite the future revocation of regional strategies. PPS3 paragraph 71 is clear that in circumstances where a local planning authority cannot demonstrate an up-to-date five year supply of deliverable sites for housing, 'they should consider favourably planning applications for housing having regard to the policies in this PPS including the considerations in paragraph 69.'
- ES.23 The Wiltshire Local Plan will deliver a strategic framework to provide for the continuous delivery of housing and ensure that there is a flexible and responsive supply of housing land available. Wiltshire Council will identify a specific supply of developable sites for years 6-10 and where possible, for years 11 to 15. In circumstances where it is not possible to identify specific sites for years 11 to 15, broad locations for future growth will be identified.
- ES.24 The draft National Planning Policy Framework (DCLG, July 2011) requires that the five year land supply is supplemented by a contingency of 20%. The developing NPPF is a consideration and Wiltshire Council will ensure that an adequate land supply can be demonstrated from adoption.
- ES.25 The draft Strategic Housing Market Assessment (produced by Fordham Research) is being finalised and identifies Housing Market Areas (HMAs) within Wiltshire. It is considered appropriate to assess the strategic housing land supply requirement at this level in order to ensure an appropriate level of supply within Wiltshire's HMAs. However, in order to ensure an appropriate distribution of housing across Wiltshire that supports the most sustainable pattern of growth, requirements are also provided at a community area level within the Local Plan. For the avoidance of doubt, these smaller areas are considered to be inappropriate for the assessment of supply. However, these more localised requirements should be capable of being a material consideration to prevent settlements receiving an unbalanced level of growth justified by under or over delivery elsewhere.
- ES.26 The identified requirement will need to be delivered in suitable, sustainable locations and at appropriate times through the plan-led system. One of the key responses from the recent consultation is the need to ensure that job growth and infrastructure delivery comes forward at the right time to deliver the overall Strategy. In order to develop a mechanism to ensure that this can happen, a phasing policy is considered. However, the current economic climate will exacerbate the housing need in Wiltshire (and nationally) and a phasing policy may constrain supply even further. Therefore, this will not be taken forward in the Local Plan.
- ES.27 The balance of jobs to the resident workforce will continue to be monitored in order to ensure that strategic objectives 1 and 3 of the Local Plan are being delivered, without promoting commuting flows. Whilst there is no formal phasing policy recommended, the requirement for infrastructure and employment opportunities is maintained, and housing applications will be considered in this context.

1. Introduction

- 1.1 The purpose of this paper is to address Wiltshire's strategic base housing requirement for the plan period 2006 2026. This is in response to the announcement on 27 May 2010 by the Secretary of State for the Department for Communities and Local Government (DCLG) confirming the Coalition Government's intention to "rapidly abolish Regional Strategies (RS)". The housing requirement includes that for South Wiltshire, which has been subject to public hearings in August 2011. The Inspector found this portion of the housing requirement to be sound. This paper proposes the distribution of the requirement across the entirety of Wiltshire which was subject to consultation from 13th June to the 8th August 2011.
- 1.2 The south west Regional Spatial Strategy (RSS), whilst not adopted, contained specific policies on a wide range of planning issues, with one of its central functions being to establish the overall scale and distribution of new housing across the south west region. These regional targets were translated into local authority targets, and in some cases housing targets set for specific settlements as well as broad Areas of Search. These Strategically Significant Cities or Towns (SSCTs) included the Wiltshire towns of Chippenham, Salisbury and Trowbridge, with the west of Swindon identified as an Area of Search.
- 1.3 A further letter from the Secretary of State on the 6 July 2010 announced the revocation of RS by way of an Order laid before Parliament. This letter confirmed that 'Local Planning Authorities will be responsible for establishing the right level of local housing provision in their area, and identifying a long term supply of housing land without the burden of regional targets.'
- 1.4 The revocation decision has since been subject to judicial review and successfully challenged at the High Court⁵. The judgement upheld the grounds for the challenge, namely that the Secretary of State:
 - Used his powers to revoke RSs improperly and against a fundamental purpose of primary legislation to establish RSs as a tier of planning policy; and,
 - Acted unlawfully by revoking RSs without any reference to the requirement to assess the environmental impacts of the revocation (ie without an SEA).
- 1.5 The immediate impact of this judgement is to reinstate RS as part of the development plan, this was confirmed by the Planning Inspectorate in guidance issued to Inspectors which stated that the RS as it stood on 5 July forms an ongoing part of the development plan.⁶
- 1.6 The intention to abolish RS has been confirmed through the Decentralisation and Localism Bill. Enacted in November 2010, this bill contains the relevant clause providing the mechanism for future revocation. Further legal challenges are ongoing regarding the weight to be given to the announcements to revoke regional plans. However, Wiltshire moved quickly to confirm its position and this was formalised at the Cabinet meeting of 19 October 2010. Cabinet resolved that in light of the revocation of the Regional Spatial Strategies, the Wiltshire and Swindon Structure Plan 2016 sets out housing figures for Wiltshire up to 2016 (as set out in saved Policy DP4). It was also resolved that Cabinet:
 - Agrees that Wiltshire's new housing requirement is determined through a comprehensive review involving local communities, which responds to the Decentralisation and Localism Bill.
 - Agrees that the new housing requirement be progressed as part of the Local Plan process.

⁵ High Court Queen's Bench Division Case No. CO/8474/2010

⁶ The Planning Inspectorate November 2010 Regional Strategies – Impact of CALA Homes Litigation

- 1.7 However, an appeal decision⁷ in Wiltshire concluded that the evidence base which informs the current un-adopted RSS for the south west is more up-to-date and robust, a significant factor which weighed in favour of the granting of permission. Whilst the Wiltshire and Swindon Structure Plan 2016 still forms part of the development plan, the evidence base is somewhat out-of-date and in order for the Council to deliver development through the plan-led system, rather than by appeal, it is more important than ever to move forward expediently to ensure the authority is best placed to ensure the delivery of appropriate sustainable patterns of development.
- 1.8 Furthermore, a recent appeal decision⁸ concluded that the proposed revocation is not a material consideration. It went on to state that significant weight can only be attached to the intention to revoke in exceptional cases where "very clear and cogent reasons" for doing so are given. This clearly reinstated Regional Strategies as part of the development plan until the Localism Bill is enacted. However, since the enactment of the Bill the materiality to be attached to revocation should be reviewed.
- 1.9 In the south west the Regional Strategy was not adopted, and so this ruling reinstates RPG10 as the statutory development plan. However the evidence behind RPG10 has been largely superseded by the evidence in the emerging RSS. Without the RSS having been adopted in the South West, it forms only a material consideration of indeterminate weight.
- 1.10 The previous Wiltshire housing targets developed through the RSS process were based on initial evidence provided by Wiltshire County Council through the submission of Section 4(4) advice. The draft RSS then presented housing targets for the former district areas which were subsequently revised during the Examination in Public (EiP) in to the RSS. The Proposed Modifications version of the RSS identified the most recent regional strategic housing requirements for Wiltshire. Table 1 shows the various stages of the RSS with corresponding housing requirements.

Area / Settlement	Wiltshire and Swindon Structure Plan 2016 (1996-2016)	4/4 Advice (net dwellings 2006-2026) OPTION 1	Draft RSS Requirements 2006-2026	RSS Proposed Changes 2006-2026
Kennet District	5,250	5,000	5,000	6,000
North Wiltshire	9,000- 10,000*			
Chippenham urban area	3,000	4,500	4,500	5,500
District Remainder	6,000	4,500	4,500	5,200
West of Swindon	0-1,000*	Up to 2,000	1,000	3,000
Salisbury District	8,000			
Salisbury urban area	3,900	5,000	5,000	6,000

Table 1: Housing Requirements

⁷ Site at Brynard's Hill, Royal Wootton Bassett. APP/Y3940/A/10/2141906

⁸ R (CALA Homes (South) Ltd) v Secretary of State for Communities and Local Government (No2); Ref: EWCA Civ 639; 27 May 2011. Paragraph 33. <u>http://www.bailii.org/ew/cases/EWCA/Civ/2011/639.html</u>

Area / Settlement	Wiltshire and Swindon Structure Plan 2016 (1996-2016)	4/4 Advice (net dwellings 2006-2026) OPTION 1	Draft RSS Requirements 2006-2026	RSS Proposed Changes 2006-2026
District remainder	4,100	4,000	4,000	6,400
West Wiltshire	11,750			
Trowbridge urban area	5,000	5,000	5,000	6,000
District remainder	6,750	5,500	5,500	6,300
Wiltshire Total	34,000- 35,000	33,500 – 35,000	34,500	44,400

*The Structure Plan makes provision for an additional 1,000 dwellings at the western side of Swindon, which could at least in part lie in North Wiltshire.

- 1.11 The revocation has, in the short-term, implications for the consideration of planning applications in advance of an up to date planning framework through an adopted Local Development Framework (LDF). In the longer-term the main issue is one of establishing a housing requirement for Wiltshire to be tested and included within the Wiltshire Local Plan.
- 1.12 The Chief Planner at the DCLG published guidance to local authorities prior to the publication of the Decentralisation and Localism Bill. The key elements of this guidance are still relevant and are as follows:
 - Localism will be at the centre of the new Coalition Government's agenda with the pre-cursor to this agenda being the revocation of RSS in order to allow local targets to be set.
 - Local Planning Authorities will be responsible for establishing the right level of local housing provision in their area, and identifying a long term supply of housing land. Some may decide to retain their existing housing targets that were set out in the revoked RSS. Others may decide to review their targets.
 - Local Planning Authorities should quickly signal their intention to undertake an early review so that communities and land owners know where they stand.
 - The revocation of RSS is not a signal for local authorities to stop making plans for their area. Local Planning Authorities should continue to develop their LDF Core Strategies and other documents, reflecting local people's aspirations and decisions on important issues such as climate change, housing and economic development. Authorities may decide to review and/or revise their emerging policies in light of the revocation of RSS.
 - Each Local Planning Authority's development plan will now consist only of adopted development plan documents, saved policies, and any old style plans that have not lapsed. Local Planning Authorities should also have regard to other material considerations, including national policy. Evidence that informed the preparation of the revoked RSS may also be a material consideration, depending on the facts of the case.
 - Local Planning Authorities should continue to collect and use reliable information to justify their housing supply policies and defend them during the LDF examination process in line with current national policy set out within Planning Policy Statement 3: Housing. It is important for

the planning process to be transparent, and for people to be able to understand why decisions have been taken.

- Local Planning Authorities should continue to identify enough viable land to meet the ambition for growth for at least 15 years from the date the plan is adopted. Authorities should also have a five year supply of deliverable sites.
- 1.13 This guidance allows for local authorities to retain their existing targets as set out in the revoked RSS or to review their housing targets. It also specifically refers to Option 1 figures suggesting that it may be appropriate to base revised targets on these, supplemented by more recent information.
- 1.14 Through this paper, Wiltshire Council has undertaken a revised assessment of the housing requirements of the area from 2006 to 2026, in line with the methodology employed in the development of the RSS targets. Furthermore, the resulting requirements have been endorsed by Cabinet, been tested for soundness by an independent expert, been informed by Localism events, and have undergone informal consultation.
- 1.15 The appropriate housing requirements to be used both in developing policy and in the determination of planning applications should not be RPG10, despite this being the regional strategy reinstated as part of the CALA II decision⁸, as this evidence is not as up-to-date as that in the RSS. This was confirmed in the appeal decision at Brynards Hill⁷. The requirements in the emerging RSS are based on more up-to-date evidence although further work on the Sustainability Appraisal is required and the plan did not reach adoption. This plan does still form a material consideration although the weight to be attached to an unadopted plan is indeterminate, especially in the light of the outstanding issues, and the intended revocation. Therefore, it is believed to be appropriate to consider the requirements developed through this paper to form the current housing requirement, even prior to revocation, as this uses more up to date evidence consistent to that used in the RSS, has been through public consultation and been subject to a full Sustainability Appraisal. Furthermore, the requirements and strategy identified through this paper are considered in general conformity with that identified in the RSS. With the exception for an allowance for the West of Swindon, the requirements are broadly consistent and the distribution of these towards the principle centres is maintained.
- 1.16 This paper determines the strategic requirement for the whole of Wiltshire, and distributes this requirement sustainably, reflecting the responses from community engagement. This provides both a top-down approach, ensuring that the needs of the area can be met as well as a bottom-up approach, providing communities with the opportunity to input and take ownership of local housing requirements. On this basis the strategic requirement is determined to form a range of figures within which development could be demonstrated to be appropriate. This range should be broad enough to ensure that the bottom-up requirement is consistent without prejudicing the aspirations for the area.

2. Policy Context

- 2.1 Within Wiltshire there are significant opportunities to strengthen the environmental, social and economic well-being of the county. In order to do this Wiltshire must be well placed to meet current and future demands for housing and employment, whilst safeguarding and enhancing the rich environment and ensuring that sustainable development is achieved. To achieve this, a number of documents have been produced which identify the key priorities, objectives, and outcomes for Wiltshire.
- 2.2 There are a number of policy documents which are particularly relevant in the process of appraising Wiltshire's future housing requirements. A summary of these are provided below.

The Business Plan 2011-2015

- 2.3 The Wiltshire Council Business Plan (2011-2015) sets out what the council seeks to achieve by 2015 as well as establishing the business model for the next 10 years.
- 2.4 Affordable housing is a top priority and this is confirmed within the business plan with the objective of delivering 450 affordable homes per year, of which 250-350 additional new homes for rent will be from PFI schemes. In addition the business plan recognises the need to deliver a wide range of dwellings to meet the housing needs of older people.
- 2.5 In terms of planning for future economic growth the Business Plan seeks to:
 - Deliver 6,000 new jobs within the private sector; and,
 - Safeguard 8,000 existing jobs.
- 2.6 The overall strategy for Wiltshire's economy is to broaden the overall employment base by improving the skills of the workforce to ensure higher value-added jobs are created. The emphasis will be on the private sector; with initiatives to make the county more attractive to inwards investment by creating a highly skilled workforce and reducing the regulatory burden on business. Providing local jobs for Wiltshire's residents will help to improve the self-containment of the towns by reducing the scale of out-commuting to other employment centres which will inturn help the authority to reduce its carbon footprint.
- 2.7 The Business Plan helps to contribute to the achievement of the long term vision set out in the Wiltshire Community Plan (2011-2026) that is: creating an economy that is fit for the future; reducing disadvantage and inequalities and tackling the causes and effects of climate change.

The Community Plan 2011-2026

- 2.8 The Wiltshire Community Plan 2011-2026 entitled People, places and promises sets a clear vision for Wiltshire alongside the priorities and objectives over the next 15 years. This outlines the overall strategic direction and long-term vision for the economic, social and environmental well-being of Wiltshire. Set out within the draft Community Plan are three key priorities. Contained within these priorities are set objectives, the most relevant to this paper are summarised below.
- 2.9 Creating an economy that is fit for the future: This is based on the recognition that the economy is a key measure of strength and future planning should ensure that Wiltshire's economy is strong, adaptable and competitive. To achieve this the Community Plan identifies the need to encourage a greater proportion of higher value and higher skilled jobs; reducing the reliance on public-sector employment; improving the skills of Wiltshire's working population to meet

employer demand; enabling older people to work beyond retirement age if they so wish; and to support existing business.

- 2.10 Reducing disadvantage and inequalities: A key priority is to ensure that Wiltshire is able to meet the needs of the growing and aging population. This includes addressing the lack of affordable housing, including social housing and shared ownership, by building new housing and bringing empty homes back into use.
- 2.11 Tackling the causes and effects of climate change: It sets an ambition to significantly reduce domestic, business and transport CO2 emissions. This will entail providing a safer and more integrated transport system in order to achieve a major shift to sustainable transport.
- 2.12 Together the Business Plan and Community Plan provide the overarching priorities and objectives for Wiltshire. The role of the Local Development Framework is to provide the planning principles, in terms of the distribution and scale of growth for housing and employment in order to deliver sustainable patterns of development which in turn deliver economic growth whilst addressing, as far as possible, issues of housing affordability.

The Spatial Vision for Wiltshire

- 2.13 The Spatial Vision for Wiltshire was identified through the Wiltshire 2026 planning consultation. It provides a clear overarching direction for development within Wiltshire.
 - a. By 2026 Wiltshire will have a much more sustainable pattern of development, focused principally on Trowbridge, Chippenham and Salisbury. Settlements of all sizes will have become more self-contained and supported by the necessary infrastructure, with a consequent reduction in the need to travel, an improvement in accessibility to local services, a greater feeling of security and the enhancement of a sense of community and place. This pattern of development, with a more sustainable approach towards transport and the generation and use of power and heat, will have contributed towards tackling climate change.
 - b. Housing, employment and other development will have been provided in sustainable locations in response to local needs as well as the changing climate and incorporating exceptional standards of design. Wiltshire's important biological and built environment will have been safeguarded and, where necessary, extended and enhanced to provide appropriate green infrastructure, while advantage will have been taken of the County's heritage to promote improvements in tourism for economic benefit.
- 2.14 There are clear themes identified within these plans and visions for Wiltshire which can be briefly summarised as follows:
 - Ensure the delivery of sustainable patterns of development
 - Increase the self-containment of settlements across Wiltshire
 - · Reduce the need to travel and the levels of out-commuting
 - Addressing housing needs across Wiltshire by responding to local needs and aspirations; and
 - Create an economy that is flexible, adaptable and competitive
- 2.15 Such objectives should be the cornerstone of strategic planning for Wiltshire with the mechanism to help deliver these objectives being the Local Development Framework.

Previous Community Consultation

- 2.16 In Wiltshire, two separate Core Strategies are being progressed; one for South Wiltshire and another for the whole of Wiltshire. The South Wiltshire Core Strategy underwent public hearings as a part of its Examination in Public (EiP) in August 2011. Since this time, the Inspector has issued his report and considers the strategy to be sound. The South Wiltshire Core Strategy will however, in effect be replaced by the Wiltshire Local Plan when it is adopted.
- 2.17 A key plank of the Government's Localism agenda is the decentralisation of decision-making and the transfer of more power to local communities to influence how local communities will develop. Wiltshire Council undertook a public consultation from October until December 2009 on the Wiltshire 2026: Planning for Wiltshire's Future. This document, although based on housing targets identified in the revoked RSS, identified a range of development options for the county (excluding South Wiltshire, which is discussed below). The comments received provide a useful indication as to the aspirations of residents throughout the county. A full analysis of the Wiltshire 2026 consultation responses can be found on the council's website⁹. A summary of the responses is provided below, with a breakdown for each Community Area available in Appendix 1.

Spatial Vision for Wiltshire

Summary of Responses

- Acceptance of the underlying principles with calls for it to be more locally distinctive.
- The plan should be firm and clear, ensuring that development takes place with the support of the local community.
- Although some people expressed concern over the level of growth set regionally, many people accepted that development could be a means of securing wider objectives with benefit to the community as a whole.
- Balance in development was seen as important, with the need to equate housing growth with employment opportunities.
- Infrastructure delivery was seen as a key concern, especially in terms of its timely delivery at the point of development, rather than later on in the plan period.

Wiltshire 2026

Summary of Responses

- The housing targets contained within the RSS were heavily criticised and led to demands for the council to 'stand up' for Wiltshire and recognise the unique rural character and dispersed settlement pattern of the County.
- There was criticism that no justification for the scale of growth proposed was provided. Residents did not understand why housing was needed.
- General support for an approach based on a settlement hierarchy when planning at the strategic level.
- General support for directing most development towards SSCTs and market towns, although there was criticism that the allocation system was too rigid and prevented natural, incremental growth of settlements, particularly in rural areas.
- Development generally regarded as acceptable where it helps to improve the selfcontainment of a settlement.
- Considered the lack of flexibility will exacerbate affordability issues, especially in rural areas.

⁹ <u>http://www.wiltshire.gov.uk/environmentandplanning/planninganddevelopment/planningpolicy/wiltshirecorestrategy.htm</u>

2.18 Following the announcement of the intention to revoke Regional Strategies, further consultation has been undertaken firstly through the Community Area Boards in early 2011, which sought to explore the appropriate housing numbers for each sub-area with community representatives, and then through the Wiltshire Core Strategy consultation from June 13th to August 8th 2011. The housing figures within this document reflected the strategic requirement, with the Community Area figures informed by a range of area specific evidence and local input.

South Wiltshire Core Strategy

2.19 Wiltshire Council submitted the South Wiltshire Core Strategy Proposed Submission Development Plan Document to the Secretary of State for independent examination in November 2009. This document set out the strategy for the delivery of growth for the next 20 years to 2026. The Issues and Options South Wiltshire Core Strategy was subject to statutory consultation in July 2007, as well as prior to submission.

South Wiltshire Core Strategy

Summary of Responses

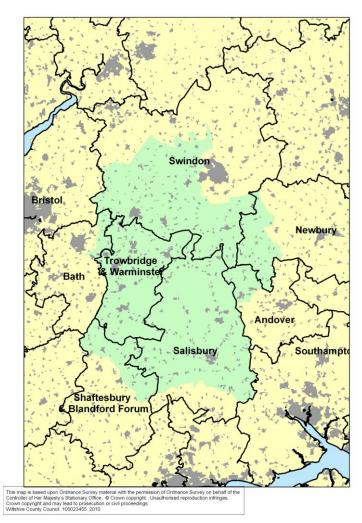
- Support for the concentration of development at Salisbury.
- No evidence to justify the need to provide the scale of housing proposed.
- Significant concerns regarding the ability of South Wiltshire to deliver the scale of housing proposed.
- Salisbury has significant environmental constraints which restrict the scale and distribution of development.
- Significant concern that the existing infrastructure will not be able to support proposed development levels.
- The proposed scale of employment land is unrealistic.
- 2.20 In light of the Government's announcement to abolish RS, the Inspector agreed to suspend the Examination in order for Wiltshire Council to review the housing and employment figures within the submitted Core Strategy. This has been undertaken as part of this comprehensive review of housing and employment requirements for Wiltshire as a whole. Given the difference between the level of housing required and considered appropriate through this paper¹⁰ and that in the previously emerging RSS, it is considered that some focused changes to the draft Core Strategy will be appropriate. The proposed review was presented to Full Council on the 22nd February 2011 along with this paper detailing the strategic requirement for the whole of Wiltshire. The proposed changes were endorsed by Full Council and will be taken forward to examination.
- 2.21 The revised housing requirements for South Wiltshire have been subject to a second set of public hearings from 8th August 2011. The Inspector has found the strategy sound, and thereby the requirement detailed within this paper for South Wiltshire. Indeed, given that the requirement for South Wiltshire was generated in a consistent way to that for the whole of Wiltshire, the Inspectors comments should apply to the requirement as a whole. The requirement for South Wiltshire is justified within this paper, but the distribution of this figure was undertaken separately in Topic Paper 20 for South Wiltshire.

¹⁰ Whilst this paper sets out the Wiltshire wide requirement alone, comparative data is available for the constituent former district areas, and so indicative requirements can be generated for South Wiltshire. However, these district level figures should only be used where they are supported by a host of locally derived information (as from the South Wiltshire Core Strategy consultations), including an assessment of community aspirations, and the consideration of the links with neighbouring areas.

3. Geographic context

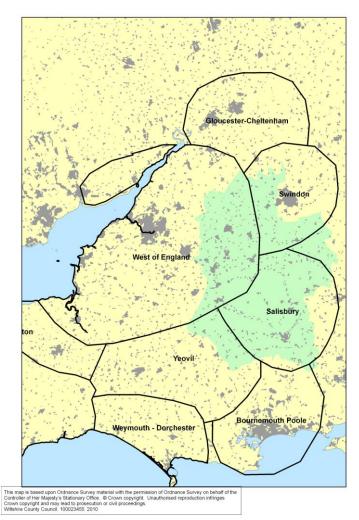
- 3.1 It is critical to understand the sub-regional context of Wiltshire, and to identify its relationship with other areas. Wiltshire is a predominantly rural area surrounded by the large urban centres of Bath, Bristol, and Swindon as well as some significant smaller centres. These centres exert commuting and housing demand pressures on Wiltshire, which need to be mitigated by any development proposals.
- 3.2 As such, the current commuting and migration patterns, and aspirations of neighbouring authorities need to be assessed in order to set the parameters for this assessment.
- 3.3 In 2007, the Office for National Statistics in conjunction with Newcastle University produced a set of 2001 based Travel to Work Areas (TTWAs). These areas are defined such that 75% of the resident working population work within each area, and 75% of those working in each area also reside in that area. Map 1 shows the TTWAs in and surrounding Wiltshire.
- 3.4 This suggests that Wiltshire should not be considered in isolation, as it performs a much broader sub-regional role. However, the parameters used within the definition of TTWAs may not fully represent all significant flows as it attempts to define self-contained areas rather than areas of interaction. As such, it is necessary to look at the detailed flows from the 2001 Census to establish the settlements outside of Wiltshire that provide a place of work for a significant number of Wiltshire residents or vice versa. This information is presented in Appendix 2a.
- 3.5 At a strategic level, Wiltshire has 196,700 jobs and 217,300 working residents. This represents a net outflow of over 20,000 workers (or 10% of the working population). This is reflective of the location of Wiltshire as well as the job offer (with a pay differential). Indeed, in 2008 those working in Wiltshire earned £2,500 less on average per year than those living in Wiltshire (Annual Survey of Hours and Earnings, ONS). This situation should be addressed by developing the economy of Wiltshire to provide higher skill/value jobs (as recognised in the Business Plan) as well as ensuring that the delivery of dwellings and jobs are aligned.
- 3.6 There are very large numbers of out-commuters, in excess of 5,000, from Wiltshire to Swindon, and Bath. There are also significant numbers, in excess of 2,000, travelling from Wiltshire to Test Valley (with over 3,000 travelling to Andover alone), Bristol, London and West Berkshire. In terms of in-commuters there are significant numbers of commuters (in excess of 2,000) from each of Swindon, Mendip (with almost 2,000 travelling from Frome alone), Bath city, and Test Valley to Wiltshire.





- 3.7 As recognised in Planning Policy Statement 4: Planning for Sustainable Economic Growth, one of the Government's objectives for prosperous economies is to reduce the need to travel. This is clearly an issue in Wiltshire as the job offer is not aligned to the resident workforce, resulting in the commuting flows above. As such, the delivery of housing should and will be targeted to help to address this imbalance. However, it must be realised that individuals are free to choose to travel and that by providing a job offer equal to the requirements of Wiltshire, commuting will still occur.
- 3.8 In 2004, DTZ Pieda were commissioned to identify a set of Housing Market Areas (HMAs) for the South West. These HMAs represent areas within which most people who are looking to move home will search for a new property in which to live. Map 2 shows the HMAs in and surrounding Wiltshire.
- 3.9 These areas broadly agree with the detailed commuting flows above, in that they show strong relationships between Wiltshire with Swindon and Bath in particular. Indeed, this conclusion is supported by the more recent work undertaken by the National Housing and Planning Advisory Unit (NHPAU) to determine up-to-date housing market area boundaries. However, these HMAs are regionally focussed and so may not capture some of the locally significant flows. As such, it is necessary to look at the detailed migration flows from the 2001 Census. This information is presented in Appendix 2b.





- 3.10 In 2001, Wiltshire saw net migration inflows totalling some 7,300, with 56,700 moving to and 49,400 moving from Wiltshire, including those flows within the area. These flows were particularly strong from the South East. Indeed, the largest internal migration flow nationally is now from the South East to the South West. The high quality of life enjoyed by Wiltshire, as well as its accessibility to London has promoted these flows, and it should be realised that these are likely to continue. Whilst this creates pressure for housing within Wiltshire, and may result in residents experiencing difficulty accessing the housing market, it does provide an opportunity for economic development with an increased workforce.
- 3.11 Appendix 2b shows that there are several areas beyond the boundary of Wiltshire that provide either significant origins or destinations for the cross-border migration flows.
- 3.12 In general, the in-migration flows are largely matched by the out-migration flows. However, the size of these flows are particularly large (in excess of 1,000) to/from London and Swindon.
- 3.13 Given the strong functional relationships with the settlements above it is appropriate to ensure that the proposed housing requirements for Wiltshire align with, or as a minimum consider, the emerging policies for these areas. It is particularly important that the housing aspirations of Swindon, Bath, Test Valley (in particular Andover), Mendip (in particular Frome), Bristol, and West Berkshire are considered.

- 3.14 Wiltshire Council has maintained a close dialogue with neighbouring authorities, with the exception of London Authorities, in order to identify future risks and challenges to Wiltshire associated with development across the region. The emphasis on locally derived housing provision will introduce uncertainty into the sub-regional strategic planning context as local authorities may pursue housing strategies in isolation of neighbouring authorities. In such circumstances development pressures may shift from traditional areas of expansion. As such, Wiltshire Council will continue to work with other authorities to ensure that the development requirements proposed reflect the sub-regional context of Wiltshire, and that the sub-regional need is met at appropriate locations.
- 3.15 This section provides an overview of research into the current position of neighbouring authorities. This provides a useful context to the sub-regional position and a steer on the likely direction of travel of housing provision across the county. It is clear that the majority of Local Planning Authorities that intend to undertake a review of future housing requirements are doing so with the intention to align economic forecasts, which take account of the economic downturn, with future housing projections.

Swindon

- 3.16 The status of Swindon as an important economic centre in the south west has been recognised through the Wiltshire and Swindon Structure Plan 2016 where it was designated a Principal Urban Area, and through the RSS where it was identified as a Strategically Significant Town. Such status ensures that the town is a focus for development and as a neighbouring authority areas within Wiltshire have been expected to take some degree of growth along its border with the western edge of Swindon.
- 3.17 The Wiltshire and Swindon Structure Plan 2016 identified the potential to deliver 1,000 dwellings along the western edge of Swindon, within either or both authorities to help to address the shortfall in the Borough's housing provision. The principle of development at the west of Swindon continued through the draft version of RSS with 1,000 dwellings, identified specifically within the former North Wiltshire District. Finally the Proposed Modifications version of the RSS increased this to 3,000 dwellings. A development of 200 dwellings has already been granted on the western edge of Swindon in accordance with this policy with a further application being considered.
- 3.18 Swindon Borough Council has taken a Revised Proposed Submission Draft Core Strategy DPD to consultation from March to June 2011. This document reappraises the Borough's housing requirement to ensure that future projections are realistic, deliverable and that it achieves a balance between economic prospects and housing delivery.
- 3.19 Prior to this reappraisal the housing target for the Borough was for 36,000 homes over the plan period. The Revised Pre-Submission Draft document identifies a housing requirement over the plan period of approximately 25,000 additional homes, a significant reduction of over some 11,000 homes (as well as 3,000 to the west of Swindon).
- 3.20 The focus of future development identified through this document will be at the Eastern Development Area (EDA) with provision also planned for Tadpole Farm on the north-western edge of the town. Development at the west of Swindon in line with the RSS requirement of 3,000 dwellings is no longer advanced in the Swindon Core Strategy.

Impact on Wiltshire

3.21 Swindon has traditionally been a destination point for Wiltshire's residents for employment, leisure and retail activities. Any significant reduction in overall housing provision at Swindon will impact on the demand for housing beyond the boundary of Swindon, particularly in those

locations with good access to the town. With a confirmed reduction of 11,000 homes, Wiltshire Council will need to work closely with Swindon Borough Council and be aware of potential pressures any reduction in housing at Swindon may place on Wiltshire's towns and villages which have an established functional relation with the Borough.

Bath and NE Somerset

- 3.22 In October 2009 Bath and North East Somerset consulted on the Spatial Options Core Strategy document which identified locations to meet the housing requirements of the draft version of the RSS, some 15,500 homes, which was in fact short of the housing requirement of 21,300 homes identified in the Proposed Changes version of the RSS.
- 3.23 Throughout the latter part of 2010 Bath and North East Somerset undertook a reappraisal of the housing and employment requirements for the district. This has culminated in the release for public consultation of the Bath and North East Somerset Draft Core Strategy which identifies the need to provide 11,000 homes within the district. Whilst this is a significant reduction a vast bulk of this, some 3,000, is the result of the removal of a planned urban extension for the south-east of Bristol into the district. The Draft Core Strategy identifies a significant reduction of employment provision, particularly around Bath. This figure has been maintained in the Significant Changes to the Draft Core Strategy which went to consultation from September to October 2011.

Impact on Wiltshire

3.24 Given the strong functional relationship between Wiltshire settlements (namely to the west of the County) and the Bath and North East Somerset district any reduction in housing provision may increase pressure on Wiltshire's housing stock, a problem which will be more acutely felt in the towns of West Wiltshire. Such pressures may exacerbate affordability and current out-commuting from towns in west Wiltshire.

Test Valley

3.25 The Test Valley area is divided into two specific areas, the northern and southern areas. As an interim position, the housing proposals in the northern area including the settlement of Andover which is an area where significant out-commuting flows from Wiltshire occur, has been reduced from 6,100 to 5,700. Given Andover's status as the principal urban area in this part of the District, a significant proportion of the 5,700 is expected to be located to this town. This reflects the significant employment commitments and regeneration aspirations of the district. In the Southern area the scale of development has been reduced from 3,920 to approximately 3,620.

Impact on Wiltshire

- 3.26 Given the significant out-commuting to Andover from Wiltshire the reduction of development at Andover will need to be taken into account when identifying Wiltshire future housing requirements. Any reduction in housing provision within an adjacent authority could place additional housing demands on Wiltshire as way as exacerbating out-commuting flows.
- 3.27 The formation of the super garrison at Salisbury Plain (whereby new units will move into the area) will increase the population and the number of jobs within the Tidworth, Ludgershall and Amesbury area. At present these areas have strong relationships with Andover. Given these relationships it should be ensured that the approach to dwelling and employment provision, and the resulting impacts on housing demand from military personnel are assessed in context and a sub-regional approach is developed to respond specifically to the military impacts in this area.

Bristol

3.28 Bristol's Core Strategy was adopted in June 2011. This included a reappraisal of housing requirements and concluded 30,600 homes should be delivered over the plan period. This compares to 36,500 homes in the proposed change to the draft RSS.

Impact on Wiltshire

3.29 Bristol has reduced its housing provision. This has implications for the entire sub-region and not just Wiltshire. As a traditional centre for growth, development pressures will filter out into the adjoining authorities and to those settlements which have good access to Bristol.

Mendip

3.30 The Mendip Draft Core Strategy (Preferred Option Stage - February 2011) identifies a housing requirement of 9,130 dwellings over the plan period (2,300 of which are identified at Frome). This represents an increase in the overall housing provision as set out in the draft south west Regional Spatial Strategy Proposed Modifications (July 2008).

Impact on Wiltshire

3.34 Discussion with officers indicated that whilst the housing requirement in Mendip is unlikely to decrease, there is not expected to be any significant revision upwards. Development at Frome is perhaps the most significant in terms of impact on Wiltshire and in this respect development proposals are likely to be consistent with the scale proposed in the Mendip draft Core Strategy.

West Berkshire

3.35 The West Berkshire Core Strategy was submitted to the Secretary of State on 9 July 2010 for examination. This process is continuing with a consultation on the Post Submission Schedule of minor changes. Only minor amendments to the Submission document are expected to reflect the revocation of the RSS.

Impact on Wiltshire

3.36 No significant change in housing provision is expected as West Berkshire's Option 1 numbers are identical to those promoted in the revoked RSS. Therefore the impact on Wiltshire as compared to the previous emerging policy is likely to be minimal. However, delivery in West Berkshire will still need to be considered in relation to the proposed delivery target for Wiltshire.

Key Messages

- Wiltshire has significant net out-commuting flows, resulting from an imbalance between jobs and the resident workforce. This should be addressed through the delivery of appropriate levels of housing in combination with the delivery of appropriate employment opportunities.
- Those authorities with which Wiltshire experiences strong commuting flows, are likely to reduce their housing targets from those proposed in the previous emerging policy, with the possible exception of Mendip and West Berkshire. As a result if Wiltshire was to maintain the targets proposed by the emerging RSS, it would cater for the sub-regional demand rather than that within Wiltshire. This would lead to an unsustainable increase in out-commuting flows.
- Wiltshire nonetheless needs to ensure that it provides enough housing to cater for local needs supporting the local economy, rather than solely for long distance commuters.

4. Considerations in the formulation of a housing requirement

4.1 There are a number of other drivers and constraints that should be considered and addressed through the delivery of appropriate numbers of homes¹¹. These are discussed separately below.

Drivers

- 4.2 Population growth: The need to deliver new housing is caused by a number of factors, primarily a growing population and the continuing reduction in household size. As such a number of population (and household) projections have been undertaken which seek to estimate the likely population growth and the resulting household growth. These projections will form the basis of this assessment and are presented in the following chapter.
- 4.3 Economy: The need to support the economy and address areas of economic vulnerability is identified in the Business Plan. One benefit of providing for the economy is that it will provide jobs that will enable the existing large out-commuting flows to be reduced, as residents will be better able to meet their employment working requirements locally. This will have obvious benefits on sustainability and help to address the carbon footprint of the area. However, in order to deliver this additional employment, Wiltshire needs to make itself attractive to employers and employment growth by providing a sufficient and suitably skilled workforce. In order to achieve this sufficient housing will be required to provide for this workforce and provide opportunities for young people to remain in the area.
- 4.4 Housing need: The Business Plan identifies housing affordability as a top priority for Wiltshire Council. Indeed, the house price to income ratio (HPIR) within Wiltshire is 7.3 which compares to 6.3 nationally (calculated from ONS Annual Survey of Hours and Earnings and Land Registry data). Furthermore, the lower quartile HPIR reflecting the affordability problems facing first time buyers is 8.1 as compared to 6.3 nationally. Planning Policy Statement 3 (PPS3) identifies the Government's key housing policy goal as ensuring '... that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live'. As such, the acute affordability issues in Wiltshire should be addressed, within the deliverability parameters identified during the course of this assessment.
- 4.5 Affordability Matters (National Housing and Planning Advice Unit, 2007) identifies the primary solution to tackling affordability problems is by increasing the overall housing supply, particularly so in the South of England, including the South West. This is supported by the Business Plan 2011-2015 which seeks to ensure the delivery of 450 affordable homes per year. The delivery of affordable housing is affected by market conditions and the willingness of private developers/landowners to bring such schemes forward. Therefore Wiltshire's future housing requirement must consider a realistic delivery rate of affordable homes taking into account these market factors.
- 4.6 The West of England Strategic Housing Market Assessment (SHMA) included some sensitivity analysis considering different supply scenarios. The figures should not be taken as being definitive as they are estimates but they do provide some indication of the likely effects on affordability of various delivery scenarios. Using this model, in order to maintain the percentage of households that are able to afford to buy or rent a property in 2009 in West Wiltshire through to 2021 would require delivery in the order of 950 dwellings per annum along with a similar increase in delivery across the sub-region or if delivery was only increased in West Wiltshire, some 3,080 dwellings would be required per annum. This figure compares to historic delivery rates of 680 dwellings per annum from 2001 to 2009, and is likely to be unattainable due to

¹¹ The definition of a home in this assessment is not confined to a C3 dwelling, but includes all self-contained civilian accommodation, including Gypsy and Traveller pitches, self-contained student accommodation, self-contained extra care units, and farm workers accommodation.

market factors. This demonstrates that maintaining the current affordability ratios, let alone addressing them presents a real challenge for Wiltshire, especially as neighbouring areas are not seeking to raise their delivery. A balance has to be struck between addressing affordability whilst both ensuring the deliverability of increased levels of housing and preventing additional commuting flows from Wiltshire.

- 4.7 The Business Plan identifies some 12,000+ people as being on the waiting list for an affordable home and outlines the council's strategy to deliver 450 affordable each year. A large number of affordable homes are delivered as part of mixed tenure developments, and in order to meet this target enough private market homes will need to be delivered to ensure the viability of these affordable properties. Emerging policy from across the country seems to require 30 to 40% of all housing to be affordable. Using this as a proxy would mean that Wiltshire would need to deliver between 1,500 and 2,000 dwellings per annum until 2014. This compares to historic delivery rates of 2,075 since 2001, and so would appear to be achievable.
- 4.8 However, the three SHMAs that cover parts of Wiltshire consistently indicate that in order to meet affordable need then delivery would have to be significantly higher than that proposed in the Business Plan. The Swindon SHMA states that 'Recent housing needs surveys completed by the local authorities indicate an annual requirement in the sub-region (of Swindon, east and north Wiltshire) of around 2,100 additional affordable housing units. This is roughly the level of planned provision for all forms of housing as set out in the Adopted Wiltshire and Swindon Structure Plan to 2016 for this area, and cannot, therefore, realistically be delivered through the planning process.'
- 4.9 The SHMA for South Wiltshire identifies an annual need for 1,314 affordable homes in South Wiltshire alone, which compares to the average delivery of 357 dwellings of all tenure types from 2001 to 2008. Clearly, meeting this affordable need is not realistic. The West of England SHMA states that 78% of all completions should be affordable over the next ten years in order to address the current and arising need. Furthermore, there are also a number of homeless people and shared households the needs of which should be considered and addressed through an appropriate level of housing delivery. Cleary given the level of housing required to maintain current affordability and Wiltshire's ability to deliver, affordability will decline resulting in an increase of shared and concealed households. As such, the need will have to be addressed by focussing on delivering appropriate housing solutions as well as increasing the overall delivery of housing.
- 4.10 During the course of the Examination in Public for the Bristol Core Strategy the Inspector specifically asked the authority to what extent does the need for a substantial scale of affordable housing support maximising the overall scale of housing provision.¹² The response to this question from Bristol City Council was that '....Higher levels of provision are not considered developable within the plan period without significant harm to other policy objectives.' Given the extent of the affordability issue within Wiltshire, it is likely that a similar position is appropriate for the County.
- 4.11 Vacant and second homes: Wiltshire had almost 6,000 vacant properties in 2001 that should be made better use of. It is possible that these could be converted or refurbished to maximise the use of these properties. That being said a number of empty homes are essential to allow for natural turnover but long-term vacancy should be addressed and indeed reversed.
- 4.12 There were also almost 1,300 second homes within Wiltshire in 2001. This form of ownership increases the pressure on the stretched housing stock, but there is no proposal to address this situation. This form of ownership will increase the requirement for additional housing, but the extent of how this could increase is unknown and assumed to be very small. As such, no

¹² BCC Core Strategy EiP BCC/Overall Housing Provision and the Green Belt 20/08/10

specific allowance has been made for this form of ownership, but this will continue to be monitored and reviewed throughout the plan period.

- 4.13 Military changes: The formation of the Salisbury Plain Super Garrison and the closure of RAF Lyneham will both have impacts on housing supply in Wiltshire. It is known that the MoD currently undertakes a Bulk Lease Hire (BLH) scheme, whereby they hire civilian housing units to cater for military personnel, which creates an additional requirement for civilian housing. As the military population within Wiltshire is set to grow, particularly in East and South Wiltshire, this may result in an additional demand for housing beyond that identified within the projections below. However, BLH is used as a short to medium term solution and it is possible that any units that are leased to the military (300 units since 2008) can be returned to civilian stock by the end of the plan period (proposed to have no BLH by 2015), creating no net additional demand for housing.
- 4.14 Furthermore, the Super Garrison will result in armed forces being located in one area for a longer period of time than has previously been the case. A proportion of military households may invest in the civilian dwelling stock in order to secure an asset and to meet their accommodation needs outside of the military housing stock. This once more has impacts upon the demand for the civilian housing stock. In general, the MoD seeks to cater for the housing needs of all its military personnel. It had planned to build in the order of 500 new dwellings in Tidworth (North East Quadrant and Area 19) to provide for this need. However, in recognition of the fact that some military personnel will chose to opt for civilian accommodation, the military is now planning to build fewer houses, and depending upon how the proposal at Area 19 progresses, could potentially deliver somewhere between 0 and 350 dwellings. This places an additional demand on the civilian stock of somewhere in the range of 150 to 500 homes provided within Tidworth Community Area. The Super Garrison development will also increase the number of personnel in Amesbury Community Area, and whilst no specific numbers have been generated by the MoD it is felt that a small allowance should be made to cater for this additional demand. Assuming a similar rate as in Tidworth, this results in a requirement for an additional 300 dwellings in this area.
- 4.15 Military married quarters, such as those at RAF Lyneham, may be privately sold within the plan period as the MoD release some of their estates. This will meet some of the projected dwelling requirement without the need for developing new dwellings. The contribution of this source of supply will have to be monitored.
- 4.16 As a general rule, the population and dwelling projections used within this paper should be used with caution when dealing with military areas, particularly Amesbury and Tidworth community areas, as the military dependent population (spouses and children of military personnel) are included in the civilian population. This results in this population ageing with the remainder of the civilian population, whereas in reality, the age structure of this population remains broadly stable due to the redeployment of military personal, and the migration of the older ages away from military areas as they retire from service. It is considered that this problem within the projections will result in the population figures being artificially increased in these areas. The impact at a strategic level is considered relatively small, but further evidence will be used to determine the distribution of properties to smaller areas.

Constraints

4.17 Market factors: Whilst Wiltshire Council can enable and encourage sustainable development through its development plan policies, the final levels of development will be driven by market factors that are beyond the control of the council. Housing delivery is unlikely to exceed certain

thresholds beyond which profit margins will be compromised. This is particularly the case if the majority of potential sites are owned or optioned by a single developer without competition.

- 4.18 A realistic level of dwelling delivery needs to be assumed, considering historic delivery rates, and the potential capacity of sites to deliver in the future. Provisional information has been taken from the development of the Core Strategies to date, in order to provide some assurance that the proposed figures are indeed deliverable. The Strategic Housing Land Availability Assessment (SHLAA) will also be used to assess the distribution of deliverable sites.
- 4.19 Infrastructure provision: In order to accommodate additional housing, current infrastructure needs, as well as those likely to arise through the delivery of additional housing, will need to be identified. This constraint will be considered when developing the distributions of the strategic growth requirement, at which point it will be possible to assess the local impact on infrastructure. This will need to be considered and addressed through the Infrastructure Delivery Plan and Local Plan to ensure the deliverability of policy.
- 4.20 A balance needs to be struck between these constraints and drivers while taking into consideration the need to promote sustainable development in line with the Community Plan and objectives of the emerging Wiltshire Local Plan, which is both a driver and constraint. Future housing growth should therefore contribute to: supporting the self containment of settlements; helping address housing needs across Wiltshire; creating an economy that is flexible, adaptive and competitive; and safeguarding the natural and historic environment where possible by ensuring the impacts of development are capable of mitigation.

Key Messages

- Housing delivery will be required in order to accommodate the future population.
- Household sizes are projected to continue to decline, and so even if no population growth was to occur, additional housing would be required.
- An employment aspiration has been identified that will need to be supported by the delivery of dwellings at appropriate locations.
- The aspiration to address the affordability issues and the housing needs within Wiltshire cannot realistically be delivered. However, by maximising growth negative impacts can be reduced.
- Wiltshire should seek to make better use of its housing stock, which will reduce the need to provide new dwellings in undesirable locations.
- Delivery in Wiltshire will ultimately be constrained by market factors.
- The changes to the military population will impact upon the requirement for Wiltshire.

5. Developing a housing requirement

- 5.1 Each of the considerations listed above are used to develop and refine a proposed housing requirement. The drivers will be considered initially in order to determine an aspirational supply, before refining this total in the light of constraints.
- 5.2 Since the announcement by the Secretary of State of the intention to revoke Regional Strategies (confirmed by the Decentralisation and Localism Bill) and allow local planning authorities to determine the scale of provision of housing, the need to ensure that such requirements are based on a robust and credible evidence base has been clear. The interim guidance issued by the Chief Planning Officer at the CLG states that '...Local authorities should continue to collect and use reliable information to justify their housing supply policies and defend them during the LDF examination process. They should do this in line with current policy in PPS3.'
- 5.3 As noted, the primary driver for housing delivery is that of population growth, and the change in average household sizes¹³. A number of projections have been undertaken which reflect differing assumptions. Whilst, each of these projections run from 1991 through to 2033, they incorporate actual data (on births, deaths and migration) until 2009, and so project forward from this date. The model cannot accommodate both actual population and dwelling data without deviating from the projected headship rates, and so the dwelling completions to 2010 are not included. Rather, the requirement for dwellings from 2001 to 2026 is calculated and the actual completions from 2001 to 2006 are removed. The projections are as follows:

1) A natural change projection, which assumes that no migration will occur from 2009 onwards. Given that Wiltshire has net in-migration flows, this will equate to an absolute minimum delivery scenario, and would not support the economic aspirations of the area. Indeed, this projection is supplied for information rather than as a base from which to develop policy.

2) An unconstrained adjusted subnational population projection (SNPP) run, which adjusts the populations within the SNPP to better account for the military from 2001 to 2009. Headship rates are adjusted to approximate this adjusted population to the dwelling delivery within Wiltshire to 2009 and then trends this headship rate in accordance with the 2008 based CLG household projections. This is assumed to provide a base population led projection. However, this simply replicates what has happened in the recent past and does not allow for the positive ambitions of the Community Plan (including supporting the economy and reducing commuting flows). As such, this is used as a benchmark, rather than determining the absolute housing requirement.

3) An economic led projection, which requires that the economically active population grows in line with the proposed job growth (see Appendix 3). This projection reflects a scenario whereby Wiltshire delivers jobs as proposed but does not seek to address the current issue of out-commuting. This would conflict with sustainable development as it would maintain the current imbalance of jobs and housing.

4) A projection which assumes that the employment growth will be met and that the population will grow to meet the need generated by this, as above, but that the need to outcommute will be reduced as the workforce and employment opportunities are balanced. This is highly ambitious for much of Wiltshire (excluding South Wiltshire) but presents an aspirational scenario. This will be discussed further in the commentary below.

5.4 The outputs from these projections are presented in Table 2.

Table 2: Comparison of population projections for Wiltshire

	Difference 2006-2026
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Projection	Population	Households	Dwellings
(1) Natural Change from 2009	32,800	19,600	19,200
(2) Population led	65,500	42,700	43,200
(3) Economic led	96,600	56,800	57,800
(4) Job alignment led	44,600	35,800	35,900

- 5.5 Whilst this sets out an initial range for dwelling requirements, this will be subsequently amended in the light of other considerations.
- 5.6 These projections forecast the requirements for Wiltshire alone and make no allowance for the requirements of the neighbouring settlement of Swindon. In previous policy, a specific allowance for housing on the edge of Swindon but within Wiltshire was made which was developed in order to meet the needs of the population of Swindon rather than Wiltshire. The requirements developed in this paper include no such allowance, and any further development (including that at Moredon Bridge) at the West of Swindon should be seen as being in addition to that required for Wiltshire alone. The requirements for the population of Swindon will be addressed through the Swindon Borough Core Strategy. The two authorities have worked collaboratively to ensure that this requirement can be met in the most sustainable location, which happens to be within Swindon Borough's administrative boundary.
- 5.7 The population led projections (2) identify a need for some 43,200 additional dwellings from 2006 to 2026. These provide a broad indication of the scale of growth that should be considered within Wiltshire if current trends continue. However, these include no policy assumptions and therefore maintain the status quo. It is the responsibility of the Council to develop policies to address and develop solutions to any identified issues and so these projections should not be taken at face value. This projection scenario is in line with the recently published Household Projections (DCLG, 26 November 2010), which project an increase of the order of 42,900 households.
- 5.8 All of the projections considered (ONS population projections, DCLG household projections, CE employment projections, Wiltshire Council population and household projections), rely on recent trends to predict what will happen in the future. Indeed, the national projections which feed into the Wiltshire Council projections rely on trends that have occurred for five years prior to the base date. This means that the 2008 base projections are dependent upon birth rates, household formation rates, and migration rates that occurred from 2003 to 2008. This period was one of economic buoyancy and is in stark contrast to the recession that occurred in 2008 and has continued to date. All of the projections will be affected by this change in circumstance. In particular the employment projections are likely to be high.
- 5.9 The issues as identified previously that will be considered include:
 - The unsustainable out-commuting flows from Wiltshire.
 - The comparatively low number of jobs per population.
 - The affordability problems in areas of Wiltshire.
 - The need to deliver affordable housing.
 - The delivery constraints of the area.
 - The number of empty homes which could be brought back into circulation.
 - The impact that the military may have on the civilian housing stock.
- 5.10 The population led requirement assumes that migration will continue in a similar vein to the recent past. However, this will be influenced by many factors, including the economy. Indeed, the 2008 migration statistics annual report identifies that the recent in-migration flows from the A8 accession countries has declined by 88% as a direct result of the recession, and future migration will be capped at significantly reduced levels under national Government proposals.

This alone, places a question mark over the realism of these projections, but it is useful to consider these as a benchmark for population driven growth.

- 5.11 The desire to return empty homes back in use is creditable, however without an Empty Homes Strategy being in place, and fully resourced, with appropriate mechanisms developed to address this, it is not demonstrable that this will be achievable. As such in the base requirements no allowance is included for the contribution that bringing empty homes back into the market could make. However, in order to demonstrate the potential of this source of supply, variant projections have been undertaken. These assume that all long-term vacancy will be addressed and returned to use. The result is that the net dwelling requirement for Wiltshire reduces by 9% or 3,800 dwellings.
- 5.12 The projection does include an allowance for second and vacant homes, on the assumption that these will comprise a constant proportion of the total dwelling stock.
- 5.13 The number of concealed households is expected to remain broadly constant over the period at around 960. It is difficult to assess the requirement for housing for this group, as they do not necessarily need or wish to find separate accommodation. Furthermore, as they are unable to find market solutions to their housing need, it is uncertain how increasing overall delivery will meet this need.
- 5.14 Crisis, a charity for single homeless people, assume that 15% of concealed households under the age of 25, and 99% of those aged 25 and over, should be considered as being homeless. It is this group for which the need will be assessed. This results in a concealed need of approximately 750 dwellings. Therefore, the requirement should be increased by 750 if this need is to be met across the period. It could instead be assumed the current numbers of concealed families will be maintained which would place no additional requirement.
- 5.15 Allowing for these adjustments this provides a population led requirement in the order of 43,200 to 43,900, depending on whether the concealed households are accounted for. As previously identified, this target could be reduced further to 39,400 to 43,900 if all long-term vacancy was addressed.
- 5.16 A priority for Wiltshire, and particularly for the Local Plan, is to ensure that the area has the capacity to maximise its economy. Therefore, the employment potential (or job growth that could be met by the increase in the working population) of the proposed dwelling range needs to be considered. Indeed, the Housing, Economic Development and Productivity Literature Review (DTZ, 2006) states that '...policy makers may wish to consider.... the fact that regional housing projections still seem to be driven mainly by demographics when there should perhaps be more consideration of how the economy will affect the demand for housing.' The proposed population led range above would only support the growth of somewhere in the region of 5,500 additional jobs using the resident population (although additional jobs could be supported by out-commuters changing jobs to work within the area).
- 5.17 The employment led projection (3) provides a forecast of the dwelling growth required to meet the estimated employment growth of Wiltshire. This estimate provides for 27,690 additional jobs (as projected by Cambridge Econometrics) in Wiltshire between 2006 and 2026, which equates to 26,300 working people, assuming that 5% of jobs are accounted for by second jobs¹⁴ and assumes that the working population will grow in line with the job growth. Whilst all employment projections should be viewed with caution as they assume that recent trends will continue, these align with a number of other projections, including those produced for the South West

¹⁴ The 2002 Labour Force Survey identifies that 5.8% of all employed persons have a second job in the South West. This is higher than elsewhere in the UK. Through examination of the South West Growth Scenarios (SWO 2010) it seems as though Wiltshire has a high rate of double jobbing within the region. However, an assumption of 5% is considered to be a conservative, and therefore reasonable, estimate in the absence of more robust Wiltshire specific data.

Observatory by Oxford Econometrics (see Appendix 3). However, these projections are felt to be far less robust at a former district level, particularly in South Wiltshire, for which it is projected, that employment delivery would increase dramatically toward the end of the plan period. The Wiltshire wide employment projection is used at a strategic level only, but in order to account for the deviations at district level the delivery of housing will be distributed using more considered arguments.

- 5.18 Planning Policy Statement 4 (PPS4) states that the Government's objectives for planning include; to 'deliver more sustainable patterns of development, reduce the need to travel, especially by car and respond to climate change'. This is reinforced in the Strategic Objective 1 of Wiltshire Local Plan, which seeks to reduce the need to travel.
- 5.19 The aspiration for Wiltshire Council should be that sufficient jobs are provided for the resident population, in appropriate locations, and the need to commute out of the area is negated. Therefore, a range can be developed from the economic projection, reflecting at one end of the scale, that jobs will be aligned to the resident population, and at the other end that current net out-commuting propensity will be maintained. The resulting employment led dwelling requirement is in the order of 35,900 from projection 4 to 57,800 from projection 3.
- 5.20 The delivery of housing, resulting in additional members of the workforce, will not only support the delivery of employment by attracting employers to the area, but will also create employment opportunities in the construction and service industries to deliver and maintain dwellings and services.
- 5.21 It should be noted that due to the sub-regional location of Wiltshire, neighbouring the large employment centres of Bath, Bristol and Swindon, that reducing to a zero net commuting situation is very ambitious, due to the commuting pressures exerted by these settlements. However, the flows to these settlements, whilst large are smaller than the flows to the comparatively small employment centres of Chippenham, Trowbridge and Salisbury within Wiltshire. This would suggest that there is a real appetite to work locally where there is ample provision of job opportunities. As such, by providing job opportunities appropriate to the resident workforce, it is likely that Wiltshire will be able to reduce out-commuting flows.
- 5.22 Delivery towards the top end of the range would conflict with objectives of national policy, and create large commuting flows, contributing to climate change and congestion on Wiltshire's road infrastructure. The best opportunity to minimise commuting flows would be to develop towards the lower end of this range, providing that this does not compromise the development of the economy or the delivery of jobs, and that this can be demonstrated to be realistic. However, under provision could also lead to an increase in commuting, as the pay differential could favour long distance commuters being able to access the market before local workers. Indeed, during the compilation of the RSS anecdotal evidence suggested that this occurred in North Wiltshire. It was suggested that better paid Swindon employees choose to live in the market town of Chippenham whilst lower paid Chippenham workers were obliged to live in cheaper housing in Swindon. The data on commuting does not support this argument, with only approximately 230 people commuting from Swindon to Chippenham, which is substantially less than the 320 travelling from less affordable Bath.
- 5.23 The current pay differential should be sought to be reduced through the delivery of appropriate jobs across Wiltshire. This should minimise long distance commuting flows, and thereby increase the availability of housing for local workers. It is proposed that the delivery of jobs, the pay differential and the commuting flows should be monitored in line with the plan, monitor, manage approach, in order that policies can be reviewed if required.
- 5.24 As identified previously, the neighbouring authorities to Wiltshire, have signalled that housing is likely to be reduced which reflects national trends since the intention to revoke the RSS has

been announced. Wiltshire needs to ensure that delivery is reflective of delivery in the subregion and monitor progress on this. This will ensure that Wiltshire meets need within the area, whilst ensuring against a rise in commuting flows.

- 5.25 This range can be adjusted by considering the effect that making better use of empty homes could make (as above). This would result in the dwelling requirement reducing by between 3,600 and 4,000 dwellings. However, without this being demonstrated to be achievable it is not considered further in this paper. The delivery of the empty homes strategy should at least begin to address this issue, but given that this has not yet been delivered and the results of this strategy cannot yet be estimated it is more defensible to consider the economic led range in the order of 35,900 to 57,800.
- 5.26 This range is still very broad and needs refinement through the consideration of additional constraints to delivery. It should be noted that this range makes no specific allowance for meeting the needs of existing concealed households, but delivery at anything other than the very minimum of this scale, allows for a level of dwellings which will be occupied by those that do not work within the area. Those dwellings that are not required to support the delivery of employment could be considered to contribute to meeting the needs of concealed households, providing that appropriate housing solutions are delivered. In any case, the level of concealed households is not expected to grow over the plan period and so delivery within the range will not exacerbate this issue.

6. Refining the range

6.1 The economic led range identified above will be refined by assessing the impact of the considerations outlined in the previous paragraph. Following this, further checks will be undertaken to quantify the effects that the proposed level of housing growth is likely to have in terms of affordability, commuting flows and housing need.

Supporting the economy

- 6.2 In order to develop the employment base, it is necessary to make Wiltshire attractive for business start-up and as a destination for relocation. The key influences on businesses identified by The Times (http://www.thetimes100.co.uk/theory/theory--location--391.php) are as follows:
 - Closeness to market.
 - Communication links.
 - Closeness to raw materials.
 - Availability of appropriately skilled employees.
 - Opportunity for waste disposal.
 - Availability of power supplies.
 - Availability of land.
 - Government incentives.
- 6.3 It is the responsibility of the employment policies within the Local Plan (and the Wiltshire economic strategy) to ensure that these are in place to encourage employment opportunities. However, the availability of the workforce is directly tied to the delivery of housing in suitable locations. Indeed, the Housing, Economic Development and Productivity Literature Review (DTZ, 2006) identifies the strong connection between housing and economic performance. It states that 'There is evidence that the quality and range of housing available in an area is an important consideration in attracting skilled labour. As the knowledge economy grows there will be increasing competition for skills, and business location decisions will take more account of whether an area has the right environment (including housing) to attract skilled workers. Already

it is clear that while high quality housing alone may not be enough to attract significant inward investment, a lack of high quality housing may preclude it.'

- 6.4 Housing Shortages: what Councils can do (Housing Commission, November 2010) identifies the need to develop more housing nationally. It states 'For some 20 years, household numbers have been rising by more than the number of new homes built. National projections have indicated a requirement... of between 237,800 and 290,500 additional homes per annum. But even in the best years of the property boom, the highest number of new homes built in England in recent years has been around 200,000'. Indeed, in 2009/10 only 114,000 new homes were built. This has resulted in a significant unmet need being present, creating competition for housing which in turn has inflated house prices. This problem does not only affect those on the lowest incomes, as average house prices have increased much faster than earnings. Indeed, nationally the lower quartile house price to lower quartile earnings ratio has increased from 4.8 in 1997 to 8.9 in 2010¹⁵. It goes on to state that 'new households have to spend disproportionate amounts of their incomes on their accommodation which lowers their living standards (and reduces their spending power for the rest of the economy) sometimes leading to financial difficulties that ruin life chances'.
- 6.5 Furthermore, the report identifies the construction industry as being 'hugely important as a source of employment. The current low level of housing output has led to substantial job losses....building 100,000 new homes generates work for nearly 150,000 people. Investment in construction....greatly affects GDP. In the second quarter of 2010 about half of GDP growth came from construction. With so much spare capacity in the system there is huge potential for generating economic recovery'.
- 6.6 Delivery towards the bottom end of the economic led range assumes that the number of employed residents will match the proposed level of jobs (with an allowance for double jobbing). This means that there will be limited additional available employees to encourage further employment development, other than those that are unemployed or are students. Whilst it could be assumed that any additional business development could seek to tackle unemployment, it is unreasonable to assume that unemployment will not exist. As such, this policy scenario could limit additional employment growth due to the lack of a workforce, and it is recommended that housing delivery lies above this end of the range.
- 6.7 New employment opportunities will be provided through business start-ups, relocation of and expansion to existing businesses. It is the intention to assess whether this could be delivered even if dwellings were delivered towards the lower end of the employment led dwelling range. The vast majority of businesses are small. Some 97.4% of businesses employ less than 50 persons in Wiltshire. Indeed, 87.2% employ ten or less. In considering new businesses alone, 97.9% of those in Wiltshire employ less than ten persons. Given this, the number of economically active persons that are not employed (or are looking to change jobs) within Wiltshire does not need to be sizeable in order to support business start-ups, or indeed to allow for incremental growth of existing businesses. However, this may have more of an impact upon larger businesses looking to relocate.
- 6.8 In 2006, it is estimated that Wiltshire had a labour force of 246,200 and provided employment opportunities for only 213,800 persons (although this equates to approximately 224,500 jobs), creating a buffer of 32,400 workers that could support employment growth.
- 6.9 By 2026 the workforce buffer (unemployed or out-commuters) is estimated to have changed to between 8,800 and 36,100 depending on the level of housing delivery (within the identified range). The buffer of 8,800 reflects only those that are unemployed, and so delivery at the

¹⁵ This is a different measure to house price to income ratios (as previously used) as this is proportional to the average individual earning rather than the household income (Source: CLG live tables).

bottom end of the dwelling range would not support any further employment delivery. However, if delivery was towards the top of the dwelling range, there would be 26,200 (36,100 - 8,800) resident workers who were unable to meet their employment needs within the area, and so would support further employment development or would commute in addition to the current unsustainable flows.

- 6.10 The size of this workforce buffer will be dependent on the self-containment of the area. If there are zero cross border commuting flows, there will by default be no employed workforce buffer. It is necessary to strike the balance between providing for a workforce buffer and ensuring that imbalance between homes and jobs is addressed. These factors will be considered based on the final range at the end of this paper.
- 6.11 The delivery of housing and employment needs to be aligned such that any employment delivery is supported by appropriate housing and vice versa. This will be key to ensuring the sustainability of Wiltshire and should be reviewed throughout the plan period.
- 6.12 Another key consideration is the skill base of the workforce buffer. According to the Annual Population Survey, Wiltshire has one of the highest levels of qualifications of all local authorities in the South West. Indeed, some 33.1% of the working age population have NVQ level 4 or equivalent or higher qualifications which is second only to B&NES and Bristol (the national percentage is 29.6%). Furthermore, some 55.6% have NVQ level 3 or higher qualifications. This is the joint highest proportion with Bristol, and compares to 48.9% nationally.
- 6.13 Given this brief analysis, it would appear that Wiltshire is well placed to deliver additional employment opportunities, as it currently has a highly skilled workforce whose working requirements are not met within Wiltshire. If, despite the proposed employment growth, current commuting propensities are maintained due to a comparative over delivery of homes then the commuting flows will increase. However, if the imbalance between homes and jobs is addressed, commuting flows and the number of people unable to meet their employment requirements within Wiltshire will reduce. This may restrict the potential for employment delivery during and beyond the plan period, as residents will already have met their employment needs locally. Indeed, as jobs and homes become better aligned, there will be a need to ensure that jobs can continue to be delivered.
- 6.14 The result of ensuring that there is a workforce to support future employment delivery revises the minimum to somewhere in excess of 35,900, assuming that long-term vacancy remains static, and somewhere below 57,800. However, these figures will continue to be considered to provide the extremes of the range but it must be realised that delivery at these levels could be detrimental to either employment delivery, or sustainability (at either end of the range).

Affordability

6.15 It is an obvious result of supply and demand that the fewer dwellings that are delivered the higher the cost per unit will be. However, whilst Wiltshire has acute affordability problems it must be viewed in its sub-regional context. Indeed, many of the neighbouring authorities have higher House Price to Earnings Ratios than Wiltshire (CLG live tables).

Local Authority	Median house price to median earnings	Rank	Lower quartile house price to lower quartile earnings	Rank
Wiltshire	7.29	8	8.09	9
Swindon	5.61	12	5.71	12
West Berkshire	7.08	10	8.25	8
Test Valley	7.88	7	8.70	5
New Forest	8.97	4	9.63	3
East Dorset	10.71	2	11.18	1
North Dorset	9.43	3	8.75	4
South Somerset	7.27	9	7.44	10
Mendip	8.09	5	8.53	7
B&NES	8.06	6	8.61	6
South Gloucestershire	5.90	11	6.87	11
Cotswold	11.65	1	10.88	2
England	6.27	-	6.28	-

Table 3: House Price to Income Ratios of those authorities surrounding Wiltshire

- 6.16 As previously alluded to, and identified in work by the NHPAU, the primary mechanism for increasing affordability is through the delivery of further housing. However, given that some neighbouring authorities appear to be reducing their housing requirements in relation to the revoked emerging strategy, the demand across the sub-region will be acute. As a result, even if Wiltshire were to deliver 57,800 dwellings the effect on affordability would be negligible. Using the indicative tool provided with the West of England SHMA, the effects that this would have on affordability in West Wiltshire can be estimated. If this additional dwelling supply was distributed in accordance with the revoked regional strategy then West Wiltshire would receive 16,100 dwellings. This level of delivery would result in the percentage of households able to access the housing market without assistance declining from 63.6% in 2009 to an average of 51.4% from 2011-2021. Delivery towards the bottom of the range of 35,800 dwellings would result in this proportion reducing to 50.4%. No matter how many houses are built within Wiltshire the effects upon affordability will be negligible without supply being increased on a national or sub-national basis.
- 6.17 As previously alluded to, the former SHMAs covering Wiltshire consistently identify a need for affordable housing that would be in excess of 75% of all housing delivery. Whilst this is unachievable, in order to maximise delivery of affordable housing, the total level of housing should be maximised. Indeed, assuming that 35%¹⁶ of all dwellings delivered are affordable, the range would deliver between 12,530 and 20,230 affordable dwellings.
- 6.18 Wiltshire published a revised SHMA in December 2011. This included some analysis on the requirement for affordable housing over the plan period. The result was that 15,264 affordable

¹⁶ The proportion of housing that will be required to be affordable within Wiltshire has yet to be established. 35% is used only to indicate the difference that increasing overall delivery can make.

homes would be required from 2011 to 2026. If 35% of total delivery is assumed to be affordable this would indicate a requirement of 43,600 across this 15 year period, which equates to a total requirement of 53,900 homes.

6.19 Given that delivery in Wiltshire has limited effect on overall affordability, this cannot be seen as a driver. Indeed, all that the Council can aspire to is that the affordability of dwellings within Wiltshire remains competitive with neighbouring authorities, and in both delivery scenarios Wiltshire remains the authority with the second highest proportion of households that are able to access the market. However, through the development of appropriate affordable housing policies and the delivery of housing at an ambitious level, both the overall affordability and the provision of affordable homes will begin to be addressed.

Deliverability

- 6.20 The potential delivery capacity of Wiltshire will be analysed by considering the output of the SHLAA. This assesses sites on an individual basis, and the cumulative effects of delivery are not considered. As a result, delivery of the order identified within the SHLAA will have unforeseen consequences, and provides an unrealistic maximum. Nevertheless, this maximum is demonstrated to be of the order of 98,000 dwellings.
- 6.21 In order to complement the SHLAA, the deliverability of a housing requirement will be assessed in terms of historic delivery in the interim. This is considered to be a robust approach as the market has been less constrained in the recent past than at present, and so achieving delivery commensurate with this period is highly ambitious.
- 6.22 The period widely acknowledged as the housing boom from 2001-2008 saw average annual net delivery of 2,106 dwellings in Wiltshire, peaking at some 2,668 dwellings in 2007/08. During (and prior to) this period, Local Plans were adopted across the area, allocating a supply of land for residential uses. Given these favourable land availability and market circumstances, this level of delivery can be seen to be an ambitious delivery rate for Wiltshire.
- 6.23 Since the economic crash in 2008, dwelling delivery has reduced to 1,647 in 2009/10, despite the availability of housing sites. This represents the second lowest level of completions since 1996/97 despite the fact that there were more outstanding (or under construction) permitted dwellings than in any previous year (back to 2001). Indeed, at April 2009 Wiltshire had 8,181 net permitted dwellings that were either under construction or not yet started. This compares to an average of 6,826 over the previous five years. This limited delivery clearly reflects current market conditions, which are likely to continue in the short-term. Assuming an annual target reflective of delivery within the housing boom, would be truly stretching in the light of these market conditions.
- 6.24 Furthermore, in order to assess the ability of the market to support increased levels of delivery, it is considered appropriate to look at historic rates of delivery nationally. Indeed, looking at 10 year periods for which data is recorded, the greatest increase in delivery from one period to another was a 19% increase from the 1950's to the 1960's. This reflects the change from postwar austerity to the post-war construction boom, and saw a shift in demand as family sizes increased, as well as the proliferation of housing estates. Indeed, this percentage growth is unlikely to be replicated without a radical shift in demand and/or the economy.
- 6.25 If such a societal change was to occur, which is hugely unrealistic given the current economy and the restricted access to credit then the average delivery per annum from 2001 to 2011 of 2,033 would increase to 2,419 for the remainder of the plan period. This would result in a housing requirement in the order of 46,500. This figure is presented for illustrative purposes only, in order to demonstrate that without a radical societal change nationally, delivery of this order is simply fantastic.

- 6.26 Setting a requirement which is undeliverable will compromise the ability to deliver the added value of developments and infrastructure. Such an instance has recently been the subject of publicity in a neighbouring authority. The demand for the Wichelstowe development in Swindon of 4,500 dwellings has been such that the developer has only been able to sell approximately 500 dwellings. This has resulted in the infrastructure that was promised still having not been delivered three years after some residents arrived. Such events should be avoided, by ensuring that the requirement for Wiltshire is truly deliverable, that there is sufficient demand for housing and that the infrastructure can be funded.
- 6.27 Given the above considerations, it is recommended that the base for the dwelling requirement should not exceed that identified by the population led requirement (b) of 43,200 as this would be demonstrably undeliverable without a co-ordinated national strategy in the current economic climate.
- 6.28 This level of delivery is still a significant increase from those proposed by the Wiltshire and Swindon Structure Plan 2016, which proposed 34,000 dwellings across the 20 year period. This demonstrates that the emerging range allows for a truly ambitious level of supply as a minimum.

Environmental impact

- 6.29 During the preparation of the RSS the South West Regional Assembly commissioned consultants to undertake a Strategic Sustainability Assessment (SSA) of the emerging RSS. This assessment incorporates the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA). The purpose of the SSA was to assist in the preparation of the draft RSS by identifying the key sustainability issues facing the region, to determine what would be the likely effects of the draft RSS on these issues, and to put forward recommendations to improve it. This included identifying the sustainability implications of alternative development options for the spatial distribution of housing as well as options for the level of growth to be accommodated within the region.
- 6.30 The housing requirements identified within this paper are below those promoted through the Wiltshire 2026 consultation document and in such circumstances the conclusions draw in previous SEA/SA reports are considered to be applicable in terms of environmental impact.
- 6.31 This paper sets out a range of dwelling requirements by considering the impacts of this level of delivery. A specific Sustainability Appraisal has taken place alongside the development of these figures.

New Homes Bonus Scheme

6.32 In a letter to all local authorities Housing Minister Grant Shapps announced plans to incentivise local authorities to deliver new homes. This letter stated that 'The Coalition Agreement makes a clear commitment to providing local authorities with real incentives to build new homes. These incentives will directly reward councils for new homes built.' Responding to the national housing crisis which has seen annual construction of new homes fall to its lowest level since 1924, the New Homes Bonus Scheme will "shift power back into the hands of individuals, communities and councils and give local communities a direct and substantial share in growth rather than just absorbing costs.¹⁷ In his closing remarks the Housing Minister stated, "I want to send a very clear signal that local communities that chose to go for growth, both now and in the future, will receive substantial extra funding for doing so".

¹⁷ Grant Shapps: House of Commons Written Answers 8 September 2010

- 6.33 The New Homes Bonus Scheme will see the Government match the council tax raised on each new home for a period of six years. However this initiative by the government will be subject to the conclusions of the Comprehensive Spending Review.
- 6.34 The money paid to councils under the New Homes Bonus Scheme will come from cuts to the overall total local government grant from national Government. An assessment by the Labour Party in response to the Government's proposals concluded; On the basis of initial cost projections for the Bonus scheme, the impact on council grants and an assessment of average council tax returns it is estimated that in order to maintain the revenue flow currently from Central Government, i.e. to break-even, Wiltshire will need to deliver 1,080 per annum.
- 6.35 A local authority is likely to lose money under the New Homes Bonus scheme if the total number of new homes built on an annual basis, multiplied by its average council tax is less than the top slice reduction to the local government grant. Historically Wiltshire has seen annual completions well above this 'break-even' threshold as shown in Table 4. Therefore delivery above this threshold could see an increase in revenue to the council which is not specifically ring-fenced.

Table 4: Net additional dwelling completions, Wiltshire

2005/06	2006/07	2007/08	2008/09	2009/10	2010/11
2132	2071	2665	1865	1647	2082
; ;	2005/06	2005/06 2006/07	<u>2005/06</u> 2006/07 2007/08		<u>2005/06</u> 2006/07 2007/08 2008/09 2009/10

- 6.36 Maintaining rates of delivery above 1,080 per annum will result in additional revenue for the council for at least the next 6 years. It is not clear if the bonus scheme will continue after the 6 years.
- 6.37 Furthermore, as alluded to throughout this paper, the contribution of bringing empty homes back into use should be explored. These properties are also eligible for the incentive scheme, which could help to resource the implementation of the empty homes strategy.

Legal Considerations

- 6.38 Any revised housing targets must be founded on robust evidence and collaboration with stakeholders. This will be tested through the public examination. Advice on the nature of this evidence is provided in Planning Policy Statement 3 (PPS3) on housing, re-issued by the new Government in June 2010. This includes:
 - Evidence of current and future levels of need and demand for housing.
 - Evidence of the availability of suitable land for housing.
 - The Government's overall ambitions for affordability across the housing market, including the need to improve affordability and increase housing supply.
 - A Sustainability Appraisal of the environmental, social and economic implications.
 - An assessment of the impact of development upon existing or planned infrastructure.
- 6.39 This was confirmed by the interim advice issued by DCLG which states that '...it is important for the process to be transparent, and for people to understand why decisions have been taken. Local authorities should continue to collect and use reliable information to justify their housing supply policies and defend them during the LDF examination process. They should do this in line with current policy PPS3.'

Proposed housing requirement

6.40 From the assessment it is evident that Wiltshire should plan for net dwelling delivery in the **range of 35,900 to 43,200**. Delivery beyond this base range should be supported providing that

it can be demonstrated to be in general conformity, is suitable, sustainable and addresses any resulting infrastructure requirements.

6.41 During the development of the RSS some analysis was undertaken using historic and projected trends to establish the relationship between the delivery of new jobs and new dwellings. This indicated that 1.25 additional dwellings are required to deliver one new job in the north of the SW region including east, north and west Wiltshire and 1.5 dwellings were required in the south of the region including south Wiltshire. This sought to include some allowance for net commuting flows, and so provides an appropriate benchmark against which to compare the proposed housing trajectory. In order to deliver the proposed 27,690 jobs, these rates would result in a requirement of between 34,600 and 41,500 dwellings. This is broadly in line with the proposed range and adds further credibility to the proposed figures. It also suggests that delivery of the order to 35,900 will support the number of jobs identified in the Cambridge Econometrics projections. Given the continuing economic situation, the projected levels of jobs may be questioned, and so the corresponding housing requirement will need to be monitored to ensure a balance is maintained.

Key Messages

- Delivery towards the bottom end of the range will still support the identified employment growth.
- Affordability can only be addressed through regional and national strategies rather than Wiltshire acting in isolation. Increasing dwelling delivery to 57,900 will not make a significant impact on affordability while neighbouring authorities have reduced their dwelling requirements.
- Setting a dwelling target towards the top end of the initial range can be demonstrated to be unachievable without a co-ordinated national strategy in the current climate, as this would result in a significant increase from the levels of delivery during a period in which the market was buoyant and land supply was not a constraint. The maximum has been revised to 43,200 as a result.

7. Testing options for housing delivery

- 7.1 In order to assess the impacts of adopting a dwelling target within this range, three delivery scenarios will be tested below. These will include:
 - A limited delivery scenario of 35,900 dwellings
 - A mid-range scenario of 39,000 dwellings
 - A stretching delivery scenario of 43,200 dwellings
- 7.2 These three scenarios shown in Table 5 are used to assess the issues and risks associated with various delivery targets.

	Limited delivery scenario	Mid-range scenario	Stretching delivery scenario
Population increase	46,600	52,900	61,300
Household increase	34,500	37,500	41,600
Dwelling increase	35,800	39,000	43,200
Workforce increase	-1,600	2,500	7,900
Jobs increase	-1,900 to	1,800 to	6,700 to
	23,400	27,500	33,000

Table 5: Delivery Scenarios

- 7.3 The first thing to note is that the limited delivery scenario does not actually provide for the increased number of jobs, despite this being the target of this projection. This is as a result of assuming that delivery will be constant throughout the period. The projection that led to the proposal of 35,800 had dwelling completions weighted towards the start of the period, which in turn provided a greater dwelling stock for young families to move to, who will contribute to the workforce as they age. Nevertheless, even if we were to assume that a constant level of delivery would provide for this employment growth, it would result in a situation whereby the excess workforce was effectively zero, or that jobs and homes were in balance. Delivery at this end of the range could stifle future employment growth, and it would also have negative impacts upon affordability (although these would be minimal).
- 7.4 The table clearly demonstrates that by increasing the delivery target, the capacity to deliver further jobs increases, which would support the economy of Wiltshire. Delivery at the top end of the range would also be beneficial for the affordability of housing in Wiltshire (although only to a limited extent as demonstrated), provide for the delivery of higher numbers of affordable homes, increase the capital generated through the government's incentive scheme, and yet is thought to be deliverable without compromising the environmental assets of Wiltshire. However, this level of delivery is likely to have negative impacts on the commuting situation, with the associated problems of congestion and carbon emissions.
- 7.5 Through the ongoing consultation with communities, the appetite for growth has been considered in the context of local considerations and opportunities. It is anticipated that delivery of the order of 35,900 to 43,200 could be accommodated in accordance with the consultation responses from Wiltshire 2026.
- 7.6 Whilst this requirement does not include a specific allowance for the impact on the civilian stock from the increase in the military population, which should be of the order of several hundred, it is considered that if the maximum of the range was increased it would not be deliverable. Instead, the provision of dwellings to address this issue should be delivered through the development of an appropriate distribution.
- 7.7 It is also worth considering the contribution that bringing empty homes back into use could make. If this is demonstrated to be achievable, the housing requirement could reduce without compromising the ability to increase sustainability.

8. Disaggregating the requirement for South Wiltshire

- 8.1 The submitted South Wiltshire Core Strategy (SWCS) was suspended pending a review of housing and employment figures in light of the Government's intention to abolish RS. Following this announcement, it was decided to review the submission draft. This has been ratified by Full Council and has undergone a further consultation. Throughout the development of the SWCS communities were consulted and a large evidence base was developed to determine appropriate policy. This will be used in order to develop an appropriate housing requirement that is consistent with the requirement elsewhere within Wiltshire.
- 8.2 For all areas, outside of South Wiltshire, representatives of local communities will be consulted to help inform the development of appropriate local housing targets. In particular the following aspirations should be considered to inform the generation of appropriate local housing targets:
 - That delivery seeks to provide for at least the bottom end of the employment led range where this is deliverable.
 - That delivery is below the top end of the employment led range, as the jobs are unlikely to be delivered to support this level of development.
 - That the figure can be demonstrated to be deliverable, in line with historic rates (during the buoyant economy).
 - That the figure should provide for the future population.
 - Where these are incompatible a balance will have to be struck between ensuring that economy can grow, that the population is catered for and that the figure is demonstrably achievable.
- 8.3 Using the same projections as above, the totals for South Wiltshire are presented in table 6.

	Difference 2006-2026		
Projection	Population Households Dwellings		
(1) Natural Change from 2009	4,300	3,100	3,100
(2) Population led	9,500	7,200	7,300
(3) Economic led	28,600	16,500	17,000
(4) Job alignment led	27,900	16,200	16,700

Table 6: Projection scenarios for South Wiltshire

- 8.4 In accordance with the Wiltshire-wide method, South Wiltshire should seek to deliver a level of housing that would support the delivery of employment. However, this would result in an unrealistic requirement of between 16,700 and 17,000 dwellings. There is a clear difference between this and the population led requirement, which would require only 7,300 dwellings. Owing to this disparity, the unique circumstance in South Wiltshire needs to be explored further in order to develop an appropriate requirement.
- 8.5 The disparity suggests that the employment growth is not in line with the potential population growth. Indeed, employment growth could be restricted by the available workforce before it could deliver the growth anticipated by the employment projections. The workforce of South Wiltshire is anticipated to decrease by somewhere of the order of 1,900 persons from 2006 to 2026 (according to the population led projections), whilst the employment projections indicate the potential to deliver 10,500 additional jobs. A similar situation arises in both Hampshire and Dorset (which are the only areas where the situation is known) where the number of working residents and jobs are projected to diverge. Whilst the divergence of the jobs as compared to the population in South Wiltshire, infers that any shortfall would be met through greater incommuting, this is clearly inappropriate as neighbouring areas also display the same divergence. Given this, it is proposed that the economic led projections should be considered to

be undeliverable (in terms of jobs) for South Wiltshire, and so the requirement should not be aligned to these. However, it will be important to seek to deliver an ambitious supply of housing, in order to maximise the potential of South Wiltshire to support employment growth. This is discussed further below.

- 8.6 Through further examination of the employment projections it is clear that in South Wiltshire, only 2,830 additional jobs would be delivered between 2006 and 2016, whereas some 7,640 jobs would be delivered between 2016 and 2026. This is very ambitious for the latter period, and should be viewed with caution (as all employment forecasts should). Furthermore, it suggests that by delivering housing some way below that implied by the economic projections, it would not compromise the ability of South Wiltshire to fulfil the economic potential of the area in the short-term. If the rate of employment delivery over the first period of the plan 2006 to 2016 is considered in isolation, the number of dwellings required to deliver the jobs reduces to 12,700 from 2006 to 2026, which perhaps provides a more realistic estimate of the ability of South Wiltshire to deliver employment, based on its projected resident population and more specifically projected working population¹⁸.
- 8.7 The growth of employment in South Wiltshire is attributable to specific sectors, in particular, Professional Services, Computing, Hotels and Catering, Education and Health and Social Services. It is considered that in the light of public sector cuts that the growth of health and education is unlikely for some years. Furthermore, the growth of jobs in professional services is likely to be largely reliant upon the development of the technology and science cluster around the defence research establishments. Whilst elements of this will be supported through the Core Strategy (for example at Porton Down), the remainder of the growth is estimated to be very large and so should be considered to be truly ambitious.
- 8.8 In summary, the employment forecasts reflect a short-term trend and as such are sensitive to change over a limited period, and should be used with caution, as they appear to be very ambitious as compared to the employment projections for the other areas within Wiltshire, and are unlikely to be deliverable. In this context, the dwelling requirement over the short-term (12,700) is considered to provide a more reasonable estimate of employment growth. Using this short-term led employment growth scenario does not conflict with the Wiltshire wide target, as the 4,300 fewer dwellings (17,000 12,700) are easily accounted for by the difference between the aspirational employment led requirement and final proposed range. Taking this into account an initial range of 7,300 to 12,700 is generated for South Wiltshire. Delivery at both ends of the range would cater for the predicted population growth. However, in order to maximise the potential for employment delivery, the level of housing delivery should be as ambitious as possible, within the constraints identified below, to provide for potential for employment delivery.
- 8.9 In order to develop an employment land supply, it is proposed that sufficient sites should be identified to allow for the total growth, although with the recognition that this is very ambitious, and is unlikely to be deliverable. Providing an ample supply of sites allows for choice and will maximise employment development. Salisbury City, which provides the strategic centre for South Wiltshire, currently attracts workers from a broad hinterland, beyond the bounds of Wiltshire. In this light, it is considered that any under-supply of housing locally, will not have as detrimental an effect on the potential to deliver employment opportunities as it might elsewhere. Indeed, this policy approach is thought to present no constraint on the delivery of employment, but recognises that employment development is unlikely to be of the order implied in the employment projections. However, this will require both the delivery of jobs and that of dwellings to be constantly monitored to ensure that commuting is not promoted, and that the delivery of housing and employment is in balance.

¹⁸ Even if the remaining employment requirements could not be delivered in South Wiltshire, they could be supported elsewhere within Wiltshire, particularly in the neighbouring areas of Tidworth and Warminster Community Areas, which may be able to be supported consistently with responses to the previous consultation.

- 8.10 The other consideration in order to determine an appropriate requirement is that of deliverability. In South Wiltshire from 2001 to 2008, an average of 357 dwellings was built per annum. However, uniquely among the sub-areas of Wiltshire, South Wiltshire has seen delivery increase in recent years. Indeed, from 2005, the average delivery was 445 dwellings per annum. Assuming that delivery of this order could continue South Wiltshire could deliver in the order of 8,900 dwellings across the plan period. Indeed, it may be that the level of delivery may be able to be increased in this area as the current economic slump does not seem to have affected the deliverability of housing as it has elsewhere within Wiltshire to increase supply. It is possible that the bulk buying of new housing on behalf of the MOD in the area has contributed to these increased rates of delivery.
- 8.11 A Strategic Housing Land Availability Assessment (SHLAA) was published for South Wiltshire in May 2009, reflecting the situation in 2008. Whilst this could be considered to be out of date, it is still considered to provide a reasonable assessment of land availability within South Wiltshire. This assessment identified that South Wiltshire had the capacity to deliver in the order of 14,900 dwellings. However, SHLAAs assess sites on an individual basis rather than cumulatively and as such do not assess the capacity of the market, or the appropriateness within an area to deliver all of the proposed sites.
- 8.12 In order to assess the ability of the market to support increased levels of delivery, it is considered appropriate to look at historic rates of delivery nationally. Indeed, looking at 10 year periods for which data is recorded, the greatest increase in delivery from one period to another was a 19% increase from the 1950's to the 1960's. This reflects the change from post-war austerity to the post-war construction boom, and saw a shift in demand as family sizes increased, as well as the proliferation of housing estates. Indeed, this percentage growth is unlikely to be replicated without a radical shift in demand and/or the economy.
- 8.13 If these societal changes did occur, and the current delivery rate of 445 dwellings per annum was assumed to undergo a similar growth to that of the post-war boom, then this would result in a maximum deliverable figure of 10,600 dwellings, as compared to the 14,900 identified within the SHLAA. However, this is entirely unexpected and there is no reason to think that this will occur. Nevertheless, to ensure that the housing proposal for South Wiltshire is not artificially restricted, this will be assumed to provide the maximum of the range.
- 8.14 Considering the five aspirations listed above, there is clearly some conflict in South Wiltshire, as the employment led range 3 and 4 cannot be demonstrated to be and is not considered to be deliverable, even if employment delivery is maintained from the first period of the plan, 2006 to 2016. Delivery of the order provided by the population led projections is not ambitious and would stifle the economic growth of the area, but should be easily achievable. In such circumstances, it is considered that a balance needs to be struck between these various factors. Furthermore, the impact of the growing military population on the civilian housing stock should be allowed for in this area.
- 8.15 As such, the housing requirement for South Wiltshire should be in line with that which is considered to be deliverable, namely 8,900 to 10,600 as this will at least provide for the needs of the population, and is potentially deliverable, and although this does not meet the projected employment growth, it does seek to maximise the growth within the constraints considered. The demand created by the additional military population is likely to support the housing market in this area and so further housing should be able to be delivered to meet this specific need. However, given that the maximum of the range is already so ambitious it is considered that this should be maintained. An assumption has been made that a similar level of housing is likely to be required per military employee as that estimated in Tidworth, creating demand for an additional 300 dwellings. The initial proposal for a housing requirement within South Wiltshire is

therefore 9,200 to 10,600. In the development of the South Wiltshire Core Strategy a single figure will be required. It is recommended that this is certainly not towards the top of the range, as this delivery estimate is reliant upon fundamental societal changes. Rather, it is proposed that somewhere in the middle of this range would be appropriate (9,900). This level of delivery can be seen to maximise the employment potential given the delivery constraints and at least provides for the projected population increase. Delivery of housing, employment and the resulting commuting flows will continue to be monitored to ensure that the strategy is delivering the objectives of the plan.

- 8.16 This proposal lies within the range proposed for Wiltshire as a whole, and the methodology is also consistent, taking into account the local considerations. The proposed housing requirement for South Wiltshire of 9,900 was presented to Full Council on 22 February 2011. This was endorsed by a Full Council resolution.
- 8.17 Following this, the proposed 9,900 homes for South Wiltshire has been subject to further public hearings in August 2011 as part of the South Wiltshire Core Strategy. The Inspector has found the strategy sound and singled out this topic paper for praise.

9. Distribution of the housing requirement outside of South Wiltshire

- 9.1 A series of consultation events were undertaken for the area outside of South Wiltshire hosted by the Community Area Boards in the Spring of 2011. This bottom-up approach compliments that of the strategic requirement and ensures that the needs of the area are identified at the local level within a clear strategic framework, enabling communities to inform the development of local housing requirements.
- 9.2 The consultations allowed an update to be given to each community area on the progress of the Core Strategy and to ask whether or not, despite the intended revocation of the RSS, the proposals contained within Wiltshire 2026 were appropriate, and if not, encourage discussion on what an appropriate housing requirement would be and which factors should help determine this. The resulting evidence has been used alongside the evidence generated within Topic Paper 3: Settlement Strategy, Topic Paper 8: Economy, the draft Strategic Housing Market Assessment, the Strategic Housing Land Availability Assessments, previous consultation events and other area specific evidence to identify an appropriate housing requirement for each Community Area, Principal Settlement and Market Town.
- 9.3 This bottom-up or community-led exercise represents an important contribution in the preparation of planning policies and the refinement of housing requirements for individual community areas and therefore Wiltshire as a whole. It has enabled localised housing issues to be reflected in the overall requirement.
- 9.4 The key findings

From the evidence identified above, a number of key themes have emerged. These issues should be addressed through the development of appropriate policies within the Local Plan and any subsequent Neighbourhood Plans or Development Plan Documents. These can be summarised as follows:

• The need to ensure balanced growth; communities considered that housing development is being front loaded, a view which aligns with evidence. Significant numbers of completions have taken place since 2006 as well as new commitments coming forward ahead of any growth in jobs and / or infrastructure necessary to support it. It was considered that further growth should be appropriately phased.

- The need for employment to come forward in advance of housing to address existing imbalances and help work towards self-containment of settlements.
- Communities acknowledged that the affordability of housing is a major concern across the county.
- Recognition that appropriate development can bring forward infrastructure improvements.
- The need to ensure that the appropriate infrastructure is in place at the right time.
- 9.5 Table 7 summarises the resulting figures, which are detailed in **Appendix 4**. In the case of the community areas within South Wiltshire, the housing distribution has been developed through a separate process, and so is not detailed in this paper. The Wiltshire 2026 figures are included for comparative purposes.

		Proposed requirement
Area	Wiltshire 2026	2006-26
Bradford-on-Avon town	490	510
Bradford-on-Avon remainder	130	160
Bradford-on-Avon CA	620	670
Calne town	1,140	1,240
Calne remainder	130	140
Calne CA	1,270	1,380
Chippenham town	5,230	4,000
Chippenham remainder	510	500
Chippenham CA	5,740	4,500
Corsham town	950	1,050
Corsham remainder	110	150
Corsham CA	1,060	1,200
Devizes town	2,000	1,730
Devizes remainder	420	420
Devizes CA	2,420	2,150
Malmesbury town	720	760
Malmesbury remainder	390	440
Malmesbury CA	1,110	1,200
Marlborough town	610	610
Marlborough remainder	240	240
Marlborough CA	850	850
Melksham town	1,930	1,930
Melksham remainder	110	110
Melksham CA	2,040	2,040
Pewsey CA	520	600
Tidworth & Ludgershall	1,750	1,750
Tidworth remainder	150	150
Tidworth CA	1,900	1,900
Trowbridge town	5,660	5,860
Trowbridge remainder	260	140
Trowbridge CA	5,920	6,000
Warminster town	1,650	1,650
Warminster remainder	120	120

Table 7: Proposed distribution of the housing requirement

Warminster CA	1,770	1,770
Westbury town	1,290	1,290
Westbury remainder	100	100
Westbury CA	1,390	1,390
Royal Wootton Bassett town	920	920
Royal Wootton Bassett &		
Cricklade remainder	330	330
Royal Wootton Bassett &		
Cricklade CA	1,250	1,250
West of Swindon	3,000	200
Wiltshire (excluding South		
Wiltshire)	30,860	27,100
Wiltshire (including South		
Wiltshire)	44,400	37,000

9.6 This distribution was made available through the public consultation from June 13th to August 8th 2011. During the consultation representations were made which questioned both the strategic requirement and the distribution. These responses are summarised and responded to in section 13.

10. The proposed requirement for Wiltshire

- 10.1 The Strategic Housing Requirement paper was supported by a Sustainability Appraisal (SA). This assessed the environmental, social and economic outcomes of delivery at either end of the strategic scale (35,900 to 43,200). It concluded that 'It is likely that in order to best achieve a balance between protecting and enhancing the environment and pursuing housing growth that will lead to significant social and economic benefits, a mid-range housing scenario should be pursued, provided there are strong links to Local Plan policies that will ensure housing growth is sustainable.' While on the low side of the mid-range, this provides the base requirement and delivery beyond this level will be supported providing that it is in general conformity, suitable, sustainable and provides the required infrastructure. Indeed, given the opportunities for neighbourhood plans to bring forward additional housing the proposed housing requirement of **37,000** is likely to be exceeded and will ensure that the recommendations within the SA can be met.
- 10.2 The proposed base requirement is 7,400 below the requirement identified in the draft RSS of 44,400. This difference is generally accounted for by the reductions at Salisbury and Wilton, the West of Swindon (minus 2,800 dwellings) and Chippenham (minus 1,500 dwellings). It is however, some 3,000 in excess of that within the Wiltshire and Swindon Structure Plan 2016, and so can be seen to be challenging, given the rural nature of Wiltshire, and appropriately responds to the step change in housing delivery sought by PPS3.
- 10.3 Delivery of the scale of 37,000 has been developed in conjunction with local communities. It therefore takes account of the unique local circumstances of each area and has some measure of community support. It also conforms to the strategic requirements identified within the Technical Paper, which was supported by the SA, and so would meet the requirements of the area as a whole.
- 10.4 The strategy seeks to provide a flexible and responsive supply of appropriate employment sites to encourage the delivery of additional job opportunities. Delivery of employment sites will occur alongside or in advance of housing development in order to provide a better balance of jobs to homes and address the current unsustainable commuting patterns. Any reduction in the need to commute would be compromised by adopting an overly ambitious housing requirement, or

equally by the under delivery of employment opportunities in appropriate locations. Nevertheless, the housing supply should provide for the accommodation requirements of the population. The proposed requirement will remove the need to deliver a level of housing that would have negative effects on commuting patterns across Wiltshire. In addition, through the development of Neighbourhood Plans there will be a mechanism to address local housing requirements, if they exist, beyond that detailed in the Wiltshire-wide requirement.

10.5 The balance of jobs and homes, and the resulting commuting patterns will need to be continually monitored in order that policies can be revised where they are not meeting their objectives.

The balance of homes and jobs

- 10.6 The housing and employment requirements have been developed in conjunction in order to ensure that they are complimentary, respond to the identified issues and begin to address the existing unsustainable commuting patterns experienced across Wiltshire.
- 10.7 The proposed employment land requirement is 128.4 to 131.9 hectares across Wiltshire in addition to that which has already been planned. In developing the employment land and strategic housing requirements the Cambridge Econometrics projections have been used to provide a consistent base.
- 10.8 As has previously been stated, the proposed scale of employment and housing growth will result in the need to commute being reduced. This is clearly demonstrated in Table 5, which shows that the workforce will not increase in line with the job opportunities, and so there will be more opportunity for local employment. The housing and employment policies in combination will ensure the sustainability of development.
- 10.9 Across Wiltshire, between 160 and 165 homes are proposed for every additional hectare of employment. The distribution of housing and employment has been developed considering a range of local issues including the current commuting flows, the demand for additional employment land, the proposed strategy and the projected household growth. These factors will influence the ratio of employment to housing in any given area.
- 10.10Table 8 sets out the proposed relation between housing and employment at the draft HMAs, and for the tiers in the settlement strategy.

Area	Proposed housing requirement 2006- 2026	Employment land completions 2006-2011	Proposed local and strategic employment sites 2011-2026	Ratio of homes to employment land (dwellings per ha)
Draft East HMA	5,500	4.9ha	26.9ha	175
Draft South HMA	9,900	12.7ha	50.4ha	160
Draft North and West HMA	21,600	30.8ha	101.5 to 105ha	160 to 165
Principal settlements	15,920	3.3ha	76 to 79.5ha	190 to 200
Market Towns	15,540	19.3ha	96.4ha	135
Wiltshire	37,000	48.4ha	178.8 to 182.3ha	160 to 165

Table 8: Proposed housing and employment provision

10.11The distribution of housing and employment is broadly consistent across the HMAs, ensuring that the opportunities associated with delivery are evenly distributed. The strategy to focus

employment delivery in the larger settlements provides for employment hubs in each area thus reducing the need to travel.

10.12A full SA of each policy has been conducted to ensure that sustainability is at the forefront of the strategy.

11. Assessing housing supply

- 11.1 PPS3 sets out the requirement to maintain a 5 year deliverable and 10 year developable supply of housing land. It is necessary to determine at which scale the supply requirement will be assessed. If a sufficient land supply cannot be demonstrated, then planning applications should be considered favourably. Although this does not automatically result in proposals being approved, it does ensure that housing delivery responds to the requirements within a market area. It is therefore appropriate to consider what constitutes a market area within Wiltshire and ensure that housing supply addresses the housing requirements over the area.
- 11.2 The draft NPPF sets out an additional requirement for a five year supply of deliverable housing including a contingency of 20% to be demonstrated.
- 11.3 A draft Strategic Housing Market Assessment has been produced for Wiltshire. This proposes Housing Market Areas (HMAs). It is proposed that these areas will form the appropriate scale for disaggregation across Wiltshire, as they define areas within which the majority of household moves take place.
- 11.4 Whilst within this document, Community Area and settlement housing requirements are provided, it is considered inappropriate to assess housing delivery at this scale. This is due to the fact that the requirements within any area could be met within neighbouring areas without compromising the strategy. However, the proposed requirements will be used as a general guiding principle for land supply purposes. So for example, if Trowbridge had over-delivered relative to the identified requirement for the town, the over-delivery will begin to address the requirements of the surrounding areas. It would therefore be appropriate to count this over-delivery relative to the requirements in surrounding areas, such as Westbury. If land supply was assessed at a Community Area scale, without taking into account delivery across the broader HMA, then delivery could continue without a requirement being present for the HMA, or indeed for the Community Area, where delivery elsewhere has addressed this need.
- 11.5 Despite this being the appropriate scale for assessing land supply, the town and community area requirements should also be capable of being a material consideration to ensure that delivery is distributed broadly in line with the strategy. So in the above example, whilst it is appropriate for supply in Trowbridge to provide for some of the requirement of Westbury, it would be wholly inappropriate for the entirety of Westbury's requirement to be added to Trowbridge. Indeed, across the plan period, delivery should be in general conformity with the delivery strategy.

12. Phasing

12.1 Housing requirements can be identified for the three Housing Market Areas as follows.

Housing Market	Housing requirement
Area	
East HMA	5,500
South HMA	9,900
North and West HMA	21,400
West of Swindon	200

Table 9: Housing Requirements by Housing Market Area

- 12.2 Through engagement with the communities it was keenly felt that housing development should be responsive to the needs of the community, and should therefore come forward at appropriate times in relation to employment delivery, infrastructure provision and need. These concepts were presented in the Core Policies of the Core Strategy consultation draft.
- 12.3 In order to meet the housing requirements at an appropriate point, rather than exacerbating existing requirements or encouraging unsustainable development, a phasing policy is considered appropriate. This will ensure that existing employment and infrastructure gaps can be addressed before housing growth occurs, or where there is a need for housing in order to support the economy that this can occur. Without a phasing policy, there is a risk that development could come forward during periods when it will exacerbate existing issues and/or not meet an identified need. Indeed, when housing delivery comes forward in advance of employment delivery, the new residents will seek employment elsewhere, and once settled will not support future employment delivery.
- 12.4 The comparative need at a Housing Market Area level can be evidenced by considering the population and employment led projections. These clearly demonstrate that the housing requirement is weighted to either end of the plan period for each HMA.
- 12.5 The housing requirement for Wiltshire does represent a step change in delivery, and the phasing policy will support this step change, with the immediate needs of areas such as Salisbury being met early in the plan period. Indeed, by adopting an ambitious target in the short-term, needs will be addressed but this also allows for future development to be planned at an appropriate scale.
- 12.6 There now follows a brief analysis of each of the emerging HMAs, which develops a proposed phasing policy for each.

East HMA

- 12.7 The East HMA has a requirement for 5,500 homes across the plan period. It requires 2,100 from 2006 to 2016 to meet the needs of the population and 1,700 in order to provide for proportionate employment growth. Delivery above these levels will encourage more people to move to the area, but without providing the corresponding employment opportunity. Delivery below these levels will restrict employment growth and will not cater to the needs of the population. Therefore it is considered appropriate to set a requirement of somewhere in the region of 1,900 in the first half of the plan period.
- 12.8 However, 1,640 have already been delivered from 2006 to 2010, which would leave a requirement of only 260 dwellings for the remaining 6 years. In this context the target should be

set at the top of the range (2,100) leaving a remainder of at least 460 dwellings. This does not mean that development beyond this figure would not be supported on favourable sites.

South HMA

- 12.9 The South HMA has a requirement for 9,900 homes across the plan period. It requires 3,400 from 2006 to 2016 to meet the needs of the population and 6,300 in order to provide for proportionate employment growth. This would indicate that at least 3,400 dwellings should be provided and as many as can be delivered up to 6,300 should be supported.
- 12.105,800 homes are considered deliverable in this period subject to the aspirational delivery of strategic sites set out in the South Wiltshire Core Strategy, and so this would form an appropriate target as it meets the conditions above. This will be truly stretching, as it will significantly increase delivery in the short-term.

North and West HMA

- 12.11 The North and West HMA has a requirement for 21,400 homes across the plan period. It requires 13,800 from 2006 to 2016 to meet the needs of the population and 10,600 in order to provide for proportionate employment growth. Delivery above these levels will encourage more people to move to the area, but without providing the corresponding employment opportunity. Delivery below these levels will restrict employment growth and will not cater to the needs of the population.
- 12.12A requirement of the order of 10,600 homes from 2006 to 2016 would meet the needs of the employment led requirement, but any higher than this will result in residents having no opportunity but to out-commute to find employment. Therefore, it is recommended to set the requirement at 10,600.

West of Swindon

12.13Given the requirement for the West of Swindon is so small it would be inappropriate to phase this based on any projection, and so an even phasing is assumed.

Area	2006-2016	2016-2026
East HMA	2,100	3,400
South HMA	5,800	4,100
West HMA	10,600	10,800
West of Swindon	100	100
Wiltshire	18,500	18,300

Table 10: Draft Phasing Proposal

- 12.14The identified draft phasing proposal does seek to deliver high levels of growth in those areas that require it in the short-term. It is envisaged that such a phasing policy will support economic growth, whilst ensuring the sustainability of Wiltshire.
- 12.15Whilst the objectives behind the draft phasing policy are sound, the Wiltshire Core Strategy consultation (June to August 2011) responses questioned the legitimacy of such a policy. A phasing policy would only serve to constrain development, which will be constrained due to the market at present in any case. This would constrain the ability to address the current acute need for housing, as identified in the SHMA. The strategy should rather seek to promote delivery where suitable during periods of limited viability. As such, the draft phasing policy will be removed from the Local Plan.

12.16The removal of the phasing policy does however mean that housing development can occur without the corresponding employment creation. This will continue to be monitored and will be capable of being used as a consideration in the determination of planning applications, where it can be clearly demonstrated that employment development is severely lagging behind housing development (or vice versa) and so the development would be unsustainable.

13. Wiltshire Core Strategy Consultation

13.1 Following the proposed revocation of Regional Strategies, a Wiltshire Core Strategy consultation draft was made available for consultation from June 13th to August 8th 2011. A number of responses were received in relation to both the strategic requirement and its distribution. In summary, the strategic requirement responses raised the following concerns, which will be addressed within this section.

The proposed requirement does not provide the flexibility for delivery in excess of 37,000 dwellings where supported by the community

13.2 The need to provide the flexibility for local communities to address local need through neighbourhood plans and other planning mechanisms is recognised. In respect of this, the demonstrated requirement sets a floor for development which could be exceeded in line with neighbourhood plans. Development should still be in general conformity with this requirement, so that the additional requirement for infrastructure is covered within the Infrastructure Delivery Plan. Any development substantially in excess of the requirement identified within a neighbourhood plan will need to identify and address the resulting infrastructure requirements.

The job alignment projection which forms the lower end of the requirement unreasonably assumes that the projected employment can be delivered by relying on out-commuters changing the location of their employment

- 13.3 The job alignment projection seeks a position whereby jobs and working residents are in balance, which does indeed require the relative location of workers and employment to be changed. However, by considering the change, this can be demonstrated to be a reasonable aspiration, providing that employment delivery is forthcoming.
- 13.4 The working residents in 2026 will comprise of:
 - new workers arising within the area across the plan period, either through in-migration or residents reaching working age,
 - the existing working population retiring,
 - the number of workers currently in employment who will not have reached retirement age within the 20 year plan period.

The new workers will seek appropriate employment close to their place of residence, and so if employment opportunities are made available in Wiltshire these are likely to be taken by these persons, generating no additional out-commuting flows. The retiring workers will include a proportion of out-commuters, which will reduce the number of out-commuting flows. This leaves the current workers of ages 16 to 45, who are assumed not to retire in the plan period. However, over a 20 year period, a large number of these would be expected to change jobs or to move elsewhere, leaving only a minimal number that would be assumed to actively change the location of their workplace. In these terms the aspiration to balance jobs and workers seems reasonable, but it is based on the provision that employment is able to be delivered as projected.

13.5 A further point is that balancing the jobs and workers does not necessarily mean that the resident workers will occupy the jobs within Wiltshire, rather there will inevitably be cross border

commuting flows. The aspiration is instead to create sufficient jobs to provide the opportunity for Wiltshire residents to work within the area.

The proposed housing requirement is likely to stifle economic growth, by constraining the workforce of the area

- 13.6 The requirement is indeed below the requirement that would be identified if current commuting flows were to be maintained whilst delivering the ambitious level of jobs. However, owing to the number of highly qualified out-commuters that are seeking work within the area, this employment growth could be met through existing demand.
- 13.7 As identified previously, the ratio of homes to jobs is comparative with that proposed within the RSS (1.33 as compared to between 1.25 and 1.5), and so can be seen to be in general conformity.
- 13.8 If the South Wiltshire requirement is dismissed as this has been found sound and will not be reexamined, the remainder of Wiltshire has a requirement of 27,100 homes. According to the Cambridge Econometrics projections, this area has capacity for 17,190 homes. This provides a homes to jobs ratio of 1.58, which is vastly in excess of that required for this area within the RSS (of 1.25). From this analysis, the housing requirement can be seen to be very generous. Indeed, according to the RSS ratio the requirement would only be 21,500 homes.
- 13.9 As identified in paragraph 5.8, the employment projections are likely to be high, given the continuing economic circumstance, and employment growth will be constrained by factors quite separate from the strategy.
- 13.10Given these considerations, the housing requirement is considered to be appropriate, especially as it has been revised to a base requirement, to allow some flexibility for further delivery.

The requirement is less than the population led projection and so the demographic requirement will not be met

- 13.11 The Wiltshire Council population led projection requires that 43,200 dwellings would be required across the plan period as compared to the proposed 37,000. The DCLG household projections identify that 36,000 would be required outside of South Wiltshire, for which the Council is proposing 27,100 homes. This is a significant difference, and it is agreed that this needs to be explored.
- 13.12The population growth in Wiltshire is largely reliant upon in-migration. Indeed, to provide for the resident demand Wiltshire would only require 19,200 homes. The projected levels of migration are dependent upon historic trends, which occurred during a period of economic buoyancy and as the accession countries joined the EU. This has inevitably inflated the migration figures. Residents from the UK and in particular, the South East had access to greater levels of disposable income and credit across this period, supporting greater numbers of migrant flows. However, the current and continuing economic downturn has restricted the levels of credit available, and the disposable income available to be spent on long-distance commuting, and so it is considered that the internal migration figures will be over-inflated. As the requirement for inmigrants accounts for 24,000 households, any over-estimate, will have a significant effect on the population led requirement.
- 13.13Further to the above consideration, it should be remembered that the population led requirement accords with a predict and provide methodology, which is no longer considered an appropriate basis for plan making. Instead, the plan making authority should seek to provide a strategy which provides the best outcomes. Wiltshire Council has done this, by ensuring that

there is a generous provision of housing to support employment growth, and more than sufficient housing to meet the requirements of the resident population. Indeed, by providing for the employment and housing requirements of the resident population including a reasonable allowance for in-migration to maintain the local economy, rather than providing for a large amount of in-migration in line with historic trends, which is expected to be reduced during the continuing recession, the strategic objectives of the Local Plan can be met.

13.14A final consideration is that whilst Wiltshire has already provided for an allowance for a reasonable level of population and household growth, this will be continued to be monitored and appropriate adjustments made where necessary. The requirement also forms a floor for development, and where communities recognise that further development is required, this will be supported through neighbourhood plans.

The housing requirement is not justified by a SHMA

- 13.15A SHMA for Wiltshire was commissioned in early 2011, and results have been made available and have been presented to the Housing Market Partnership. This will be made publically available prior to submission.
- 13.16The SHMA has not undertaken any independent analysis of the housing requirement for Wiltshire, but has rather relied upon the DCLG household projections. The analysis of the housing requirement has been undertaken in this paper, and the SHMA provides analysis of the tenure mix for a requirement that is broadly compatible.

The Local Plan does not plan for 15 years, as it has an end date of 2026

- 13.17This is recognised by Wiltshire Council. The submission of the document has been delayed in order that it can respond to emerging government guidance and legislation. The period has been maintained as 2006 to 2026, as this is the period for which evidence has been developed and is available. Ideally, the plan would cover at least a 15 year time period, and this will be addressed through subsequent policy reviews.
- 13.18The draft NPPF does set out that a "Local Plan should....be drawn up over an appropriate timescale, preferably a 15 year time horizon...". The strategy accords with this statement.

The sub-regional requirement (including neighbouring authorities) has been substantially reduced and so any under provision within Wiltshire will not be picked up elsewhere. Wiltshire should work pro-actively with neighbouring authorities to ensure that the sub-regional requirement is met

- 13.19The sub-regional requirement has been substantially reduced from that proposed within the RSS. Each authority has undertaken an analysis of its own requirement in order to generate these figures, and neighbouring authorities have provided responses to this process. In some instances, good practice has been shared and specific issues have been addressed through joint working.
- 13.20 The resulting reduction can be justified due to the reasons outlined throughout this paper; that the economic downturn has affected household formation, internal migration and employment generation, and so the sub-regional requirement will have reduced. Furthermore, the economic downturn has affected the capacity of developers to deliver, as well as the ability of households to access the market. Providing that each authority can demonstrate that it can deliver sufficient housing to meet the requirements of its residents, having consideration of the projected employment growth and having mind to the effects of the ongoing economic downturn, then a realistic requirement for the sub-region will be delivered. However, where an authority can be

demonstrated to provide insufficient housing, other locations for development will have to be identified jointly with neighbouring authorities.

The argument that the market could not deliver housing beyond 43,200 is not substantiated by developers

13.21 Whilst developers have submitted responses that indicate that they could deliver in excess of 43,200, this would be reliant on an array of factors beyond the control of developers. Development will not occur where there is not a demand for housing, or where there is a demand but this is not able to be supported owing to a lack of access to credit, or the viability of development is compromised owing to over-delivery in a locality. Without a co-ordinated national strategy, a radical change in the economy, and/or a change to the way in which finance is made available, delivery in excess of this figure is considered extremely unlikely. This area is explored within paragraphs 6.20 to 6.28.

The requirement would not contribute to affordable housing delivery to the same extent as a higher target

- 13.22If the overall requirement was increased this would improve the capacity of the area to deliver further affordable housing. However, the requirement is designed to balance a number of factors, including the ability to deliver economic growth, the accommodation requirements of the area, and reducing the need to travel, whilst ensuring that the requirement is realistically achievable. Wiltshire Council considers that the requirement is appropriate.
- 13.23The requirement will be reviewed as circumstances change and if further delivery is considered to be achievable and appropriate it will be increased. At present the requirement includes some flexibility by identifying a minimum level of growth, and this is considered to provide the opportunity to deliver further homes in response to local requirements (including affordable need) through neighbourhood plans.

The existence of an imbalance of jobs to the working population was questioned

- 13.24 Evidence was presented which identified that there was alternative evidence that did not identify an imbalance. This has been investigated and the following conclusions drawn.
- 13.25The 2009 ONS job density dataset identifies that Wiltshire has 231,000 jobs. This is broadly consistent with the 217,000 primary jobs¹⁹ identified within Wiltshire Council projections in 2009 (which would equate to approximately 230,000 total jobs). However, the ONS Business Register and Employment Survey 2009 identifies only 195,100 jobs. Similarly the ONS Annual Population Survey records 195,200 jobs.
- 13.26The 2009 ONS Annual Population Survey identifies 230,500 working age residents including the unemployed and the economically inactive, which contrasts with the Wiltshire Council projections which identifies a labour force of 250,000 (excluding the economically inactive).
- 13.27The data above can be used so that no imbalance is recorded, but using the consistent data sources there is always an imbalance. The Annual Population Survey records a significant difference, as do the Wiltshire Council projections. There are clearly some definitional differences and sampling errors that are causing these discrepancies. The figures that Wiltshire Council has relied upon to develop the requirement have a consistent definition and data source, the Census, and consistently project forward from this.

¹⁹ Primary jobs exclude second jobs.

The soundness of developing a housing requirement that is not in general conformity with the RSS following the CALA II decision was raised.

- 13.28It is appropriate to regularly review housing targets so that account can be made for contextual changes. These have most certainly been present with the recession.
- 13.29 Wiltshire has employed a method that is consistent with that used in the development of the RSS. Indeed, an independent expert who worked on the development of the RSS figures has critically appraised this paper and found it to be sound and in conformity with the method employed in the development of the RSS. In this context, the resulting requirement is considered to be in general conformity with that in the RSS even though the number is different.

The justification for implementing a phasing policy was questioned

- 13.30As addressed in paragraph 12.14, it is recognised that the implementation of a formal phasing policy will place a further constraint on delivery, which is contrary to national guidance and the strategic objectives of the Local Plan. As a result, the proposed phasing policy has been recommended to be removed.
- 13.31 However, as identified in paragraph 12.16, the strategy sets out various policies which will be used as material considerations in the determination of planning applications, that enable the authority to ensure that employment and infrastructure development comes forward alongside housing development.

The SA identified that delivery towards the middle of the range would provide the best balance. 37,000 homes is towards the lower end of the range

13.32This has been recognised in conjunction with the lack of flexibility provided by a single hard and fast requirement, and this has been revised to place a minimum requirement of 37,000 that can be exceeded where a requirement is identified through a neighbourhood plan. This will facilitate development at the middle of the strategic range, and will provide the flexibility to deliver appropriately.

The draft NPPF identifies a presumption in favour of sustainable development in order to support economic growth. The proposed requirement is felt to constrain economic growth and so is unsound

13.33As identified previously, the requirement is considered to not constrain employment delivery, and has been designed to support sustainable levels of economic growth.

Existing commuting flows may be more sustainable than internal flows, as it is more sustainable for a resident of Corsham to travel to Bath than to Salisbury for example.

13.34 This is recognised. It is not the aspiration solely to balance the level of jobs and the workforce across the entire area, but that this should be provided for each sub-area where practicable. So for example, sufficient jobs should be delivered in Corsham to negate the requirement to commute to Bath (although flows will inevitably continue).

The strategic requirement does not provide sufficient flexibility to deliver further strategic sites in various towns

13.35The proposal seeks to meet the requirement across Wiltshire. The distribution of this requirement has been based upon a host of localised evidence, analysis and consultation. It is not the role of the requirement to provide sufficient room for strategic sites, but rather for strategic sites to provide for the needs set out in the requirement.

13.36The assessment of land supply across HMAs, does allow for the distribution to be flexed so that the requirements across a broad area are met, rather than insisting on precise levels of development at particular locations. However, delivery will be required to be in general conformity with the distribution.

The supply relies upon the delivery of windfall which is contrary to PPS3

13.37The supply does not rely on windfall. The remainder to be identified should be delivered through a plan led system including neighbourhood planning, and subsequent DPDs. However, windfall will continue to be delivered and this will continue to be counted against the development requirements. The deliverable and developable supply required by PPS3 can be demonstrated without an additional windfall allowance.

14. Monitoring

- 14.1 Local Development Framework Monitoring: A Good Practice Guide (DCLG, March 2005) states that '....Section 35 of the Planning and Compulsory Purchase Act 2004 requires every local planning authority to publish an annual monitoring report (AMR) to the Secretary of State containing information on the implementation of the local development scheme and the extent to which the policies set out in local development documents are being achieved. Further details of this requirement are set out in Regulation 48 of the Town and Country Planning (Local Development) (England) Regulations 2004. 'However this requirement has been removed within the Decentralisation and Localism Bill. Nevertheless, there remains a requirement to transparently monitor the effects of planning policy annually.
- 14.2 Local monitoring frameworks need to be developed to respond to the requirements of the sustainability appraisal, the strategic environmental appraisal, national core output indicators, the proposed set of national indicators and any other local indicators.
- 14.3 The new monitoring reports should seek to evaluate the progress of policy against a range of indicators and provide the mechanism by which the need to review current policy is identified. This is consistent with a plan, monitor, manage approach. It is therefore essential to develop clear objectives and to complement these with appropriate indicators to measure the performance of policies with regard to these objectives.
- 14.4 A local monitoring framework is being developed alongside the Local Plan. Suitable indicators will be identified within this document to monitor housing delivery, employment delivery, outstanding housing need and how these inter-relate.

Appendix 1 – Community Area Wiltshire 2026 consultation responses

Chippenham Community Area	Wiltshire 2026 Proposals
Chippenham	3,650
Small Towns/Main villages	68
Total Allocation	3,718
	•

Summary of Responses

- Previous preferred strategic site option widely opposed.
- Reluctance to see significant expansion and desire to remain a market town.
- Past housing developments considered to be poor and delivered without appropriate infrastructure.
- Future development should deliver sufficient employment to ensure a balanced growth.
- The distribution of housing within the Community Area should be reviewed to accommodate more growth outside of Chippenham.

Trowbridge Community Area	Wiltshire 2026 Proposals
Trowbridge	2,650
Small Towns/Main villages	39
Total Allocation	2,689
	·

Summary of Responses

- A generally positive attitude to growth with support for its role as a town for significant growth.
- Concentration of growth at Trowbridge to maintain the identity of nearby settlements and avoid coalescence.
- Recognition that development can help fund improvements to the town.

Wiltshire 2026 Proposals
150
130
280

Summary of Responses

- General dissatisfaction of the concentration at Royal Wootton Bassett and the lack of scope for more rural settlements, particularly Cricklade to expand to meet local needs and aspirations.
- Overwhelming objection to Wiltshire delivery housing to meet the needs of Swindon at the western edge of the town.
- Calls for a better understanding of the potential impact of the closure of RAF Lyneham and what this means for future employment prospects and the need to build new homes.

Bradford on Avon Community Area	Wiltshire 2026 Proposals
Bradford on Avon	150
Small Towns/Main villages	47
Total Allocation	197
	•

Summary of Responses

- Concern at the scale of growth that has occurred or in the pipeline and how any further development will affect the historical character of the town.
- Criticism that outlying villages were not being given the opportunity to accommodate growth appropriate to local needs and aspirations.

Calne Community Area	Wiltshire 2026 Proposals
Calne	500
Small Towns/Main villages	39
Total Allocation	39

Summary or Responses

- General concern that existing infrastructure cannot cope with any further expansion without significant improvements.
- Some calls for more significant levels of growth in order to deliver improvements.
- Concern over the inability of Calne to attract major employers and the knock on effects this could have on future employment prospects.

Corsham Community Area	Wiltshire 2026 Proposals
Corsham	100
Small Towns/Main villages	35
Total Allocation	135

Summary of Response

- The opportunities identified were generally considered not to be ambitious, rather they were considered to be inadequate and pessimistic.
- There were calls to recognise that Corsham has the potential for more growth than proposed.
- General concern that the approach to rural settlements was too inflexible and could suffocate locally-driven growth.

Devizes Community Area	Wiltshire 2026 Proposals
Devizes	700
Small Towns/Main villages	214
Total Allocation	914

Summary of Responses

- The role of Devizes was considered to have been underplayed the town providing a local focus of services for outlying villages.
- General concern regarding the capacity of Devizes to accommodate the housing growth proposed and the capacity of infrastructure to cope.

Malmesbury Community Area	Wiltshire 2026 Proposals
Malmesbury	200
Small Towns/Main villages	124
Total Allocation	324
	·

Summary of Responses

• General disagreement of the level of growth proposed primarily because of the weak infrastructure which is already regarded as being at capacity.

Marlborough Community Area	Wiltshire 2026 Proposals
Marlborough	250
Small Towns/Main villages	125
Total Allocation	375

Summary of Responses

- A general split of opinion in terms of the issues and opportunities facing Marlborough.
- Concern that existing infrastructure will not be able to cope with further development.
- The role of villages and their ability to accommodate growth was considered to have been underestimated.

Wiltshire 2026 Proposals
400
57
457

Summary of Responses

- Opinion split on the future ambitions for the Community Area.
- Opposition to development based on the criticism of the inadequate facilities and infrastructure.
- Support for greater development based on concerns that Melksham is not being considered high enough in the hierarchy of settlements.

Pewsey Community Area	Wiltshire 2026 Proposals
Market Town	-
Small Towns/Main villages	216
(including Pewsey)	
Total Allocation	216

Summary of Responses

• Little consensus and poor response rate made it unclear as to the role of Pewsey and the extent to which is should be allowed to grow.

Wiltshire 2026 Proposals
1,200
68
1,268

Summary of Responses

- The approach to outlying settlements was considered to be crude and simplistic, relegating the villages to stagnation and failing to recognise the benefits of limited locally-driven development.
- General concern over the impact of development on existing infrastructure.
- Calls for more work and local research to refine the policy approach for this area.

Warminster Community Area	Wiltshire 2026 Proposals
Warminster	900
Small Towns/Main villages	43
Total Allocation	943

Summary of Responses

- General support for the scale of growth proposed and in some cases there were calls for larger scales of growth for the town.
- Calls for any scale of growth to be matched by employment opportunities and appropriate infrastructure.
- Outlying villages considered capable of accommodating more growth.

Westbury Community Area	Wiltshire 2026 Proposals
Westbury	300
Small Towns/Main villages	31
Total Allocation	331
	-

Summary of Responses

- Calls to ensure a balance between housing growth and employment opportunities.
- Some concerns that the plans for Westbury were not ambitious.
- General concern over the ability of infrastructure to cope with any further development
- Acceptance that surrounding villages could, and should, accept more development.

Appendix 2a - 2001 commuting flows

Swindon Bit Minor	-														Des	tinati	ons								
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Appendix 2b - 2001 migration flows

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		Swindon	Swindon	Bath	Norton Radstock Remainder of	Frome	Remainder of Mendip	Andover	Remainder of Test Valley	North Dorset	Cotswold	Vale of White Horse	West Berkshire	Bristol		Portsmouth	Southampton	London	East Wiltshire	North Wiltshire	South Wiltshire	West Wiltshire	Wiltshire
	Swindon Remainder of Swindon																		180	920	30	70	1,19 0
	Borough																		40	90	0	10	140
	Bath																		30	220	30	480	760
	Norton Radstock																		0	10	0	70	80
	Remainder of B&NES																		0	30	0	30	70
	Frome																		0	30	20	160	210
	Remainder of Mendip																		20	30	40	130	210
	Andover Remainder of Test Valley																		150 130	30 20	140 300	0 20	330 460
S	North Dorset																		40	20 60	410	20 40	400 550
Origins	Cotswold																		-0 50	240	20	20	320
Ori	Vale of White Horse																		90	60	70	20	240
	West Berkshire																		230	120	50	40	440
	Bristol																		60	100	50	100	310
	Bournemouth & Poole																		30	20	100	70	210
	Portsmouth																		30	20	30	20	90
	Southampton																		30	10	90	50	190
	London																		290	410	560	380	1,64 0
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Topic Paper 15: Housing Requirement Technical Paper

South Wiltshire	50	0	40	0	0 0	40	06 20	30	20	70	20	20	0	4	oio	270	60	7,59 0	270	8,19 0
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Wiltshire	20	20	0	50	30 <u>1</u>	<u></u> 0	10 10	;0	20	20	<u>}</u> 0	; o ;		0	<u>30 ;</u> 0	4,53 0	7,34 0	8,21 0	9,30 0	

Appendix 3 – Economic projections

The proposed job growth figures originate from a set of economic projections supplied by Cambridge Econometrics using their Local Economy Forecasting Model (LEFM). The resulting figures have been verified by comparison with other recent economic projections, namely those generated by Oxford Econometrics for the South West Observatory entitled South West Growth Scenarios (June 2010).

These comparative projections consist of a strong, central and weak economic growth scenario, and so provide some sensitivity to test the robustness of the LEFM projections. The following table presents the growth in the number persons working in Wiltshire.

Projection	Increase in persons working in Wiltshire 2006-2026*
Cambridge Econometrics LEFM projection	26,306
Oxford Econometrics weak scenario	16,200
Oxford Econometrics central scenario	22,400
Oxford Econometrics strong scenario	32,800

*The number of persons working in an area correlates to the number of jobs, with an allowance for double jobbing.

The LEFM projection forecasts higher job growth than the central Oxford Econometrics scenario, but significantly below the strong growth scenario. It is reasonable to plan for growth somewhere towards the middle of this range, and to monitor progress to account for any divergence from this trend. As such, either the LEFM or the central growth scenario would provide the most appropriate targets.

If these employment projections are translated into dwelling requirements (as within the main body of the report), then the figures in the following table are generated. This presents two scenarios; the first assumes that commuting flows will continue in much the same way as at present, and the second seeks to align the workforce to the number of jobs.

Projection	Job alignment led dwelling requirement 2006-2026	Economic led dwelling requirement 2006-2026
Cambridge Econometrics LEFM projection	35,900	57,800
Oxford Econometrics weak scenario	23,000	41,900
Oxford Econometrics central scenario	28,000	47,400
Oxford Econometrics strong scenario	36,800	57,100

The dwelling requirement resulting from the central growth scenario largely overlaps the range generated from the LEFM projection. However, the LEFM projection is more ambitious. As such, the range generated by the LEFM projection will be used as the base economic projection in order to determine an ambitious economic led dwelling requirement.

Appendix 4 – Developing the housing requirement for Community Areas

The following appendix details the formulation of the proposed housing requirement for each Community Area and for the Strategic Settlements called Principal Settlements and Market Towns. The requirement for Community Areas in South Wiltshire have been developed using a separate methodology in support of the South Wiltshire Core Strategy Review and so are not included.

Bradford-on-Avon Community Area										
Wiltshire 2026 consultation (Oct-Dec 2009)										
	Total dwellings proposed for the CA:	Of which, proposed within the market town:	Of which, proposed within the remainder:							
Proposed dwellings 2006-2026	620	490	130							

At April 2010, 409 dwellings were committed (123 complete and 286 deliverable commitments). A further 69 are estimated to be delivered through windfall in the last five years of the plan period. The proposed strategic mixed use site includes 150 homes and will strengthen the employment offer of the town, which should help to tackle the existing problems associated with the high level of out-commuters. Furthermore, this site offers the opportunity to provide an exemplar development in terms of sustainable construction and renewable energy generation. This brings the total supply figure to 628 homes (assuming that the conservative estimate of windfall delivery was to come forward), which exceeds the proposal in Wiltshire 2026 and does not include an allowance for new delivery in the villages outside of Bradford-on-Avon.

Previous consultation with the Community Area suggests that there is appetite for development in the villages in order to deliver affordable housing. It is therefore considered appropriate to increase the requirement outside of the town to 160, which will allow the settlements to address any identified local need.

The requirement within Bradford-on-Avon will also be increased to accommodate the delivery of the strategic site, and provide a small allowance for windfall to ensure that a continuous supply of housing will be available.

Market Town	Bradford-on-Avon
Large villages	Holt, Westwood and Winsley
Small villages	Limpley Stoke, Monkton Farleigh, Staverton & Wingfield

	Total dwellings proposed for the	Of which, proposed within the market	Of which, proposed within the remainder:
	CA:	town:	
Proposed dwellings	670	510	160
2006-2026			
Completed dwellings	123	61	62
2006-2010			
Developable	286	256	30
commitments			
Proposed strategic	150	150	0
sites			
Remainder to be	111	43	68
identified (including			
windfall)			

Calne Community Area	3		
Wiltshire 2026 consult			
	Total dwellings proposed for the CA:	Of which, proposed within the market town:	Of which, proposed within the remainder:
Proposed dwellings 2006-2026	1,270	1,140	130
Feedback from the rece supported in Calne and facilitate slow measured accommodate a higher f rates from 2006 to 2010 homes would be deliver comparatively high level without corresponding d increase is proposed so unsustainable pressure measured growth that sl The additional 110 dwel over the plan period deli Community Area consid Calne, and 140 elsewhee	that the Wiltshire 2026 growth, it is believed t igure than was previou were to continue throu- ed. However, it should s of development in re- elivery of employment that slow and measure on the town. A figure o hould be phased equal lings are proposed in o vered in Calne with the ered appropriate. This	level of growth was all hat Calne Community isly proposed. Indeed, igh to the end of the p be realised that Calne cent years and this she and infrastructure. In t ed growth can be main f 1,380 dwellings woul ly over the plan period rder to ensure a contin allowance in the rem	bout right. In order to Area could easily if current development lan period, some 2,400 has seen ould not be maintained, his light, a minimal itained without placing d allow for steady and
Market Town	Calne		
Large villages	Derry Hill/Studley		
Small villages		mpton Bassett, Heddi	noton and Hilmarton
Wiltshire Core Strateg			
	Total dwellings proposed for the CA:	Of which, proposed within the market town:	Of which, proposed within the remainder:
Proposed dwellings 2006-2026	1,380	1,240	140
Completed dwellings 2006-2010	471	404	67
Developable commitments	452	443	9
Remainder to be identified (including windfall)	457	393	64

Chippenham Community Area										
Wiltshire 2026 consultation (Oct-Dec 2009)										
	Total dwellings proposed for the CA:	Of which, proposed within Chippenham:	Of which, proposed within the remainder:							
Proposed dwellings 2006-2026	5,740	5,230	510							

The Wiltshire 2026 proposal of 5,740 homes for the Community Area as a whole, of which 5,230 were proposed at Chippenham itself, was not wholly supported, and so a number of population projection scenarios were examined at a special Area Board meeting to determine what an appropriate figure might be. Whilst there was a difference of opinion, there seemed to be some general consensus a figure in the order of 4,000 new homes would be appropriate at Chippenham town, provided that appropriate employment and infrastructure is delivered alongside. A requirement of the order of 4,500, of which 4,000 are within Chippenham town, is proposed to provide for the accommodation requirements of the area, and to support future job growth at the town, enabling greater self-containment.

There is a proposal for some 33ha of employment land within Chippenham which should address the imbalance between homes and jobs and reduce the need to commute.

In order to deliver the 4,000 homes in Chippenham, a number of options have been identified to deliver 2,250 homes on strategic sites, as well as a further 150 on a non-strategic site adjacent to Abbeyfield School. These proposals alongside completions and commitments leave a remainder of 550 homes to be identified. These homes will be delivered on sites identified within the Chippenham Vision, small brownfield windfall sites and other non-strategic allocations where required.

There is a generous allowance for delivery outside of Chippenham, which will allow the other settlements to address locally identified needs through Neighbourhood Plans, or subsequent DPDs.

Principal Settlement	Chippenham
Large villages	Christian Malford, Hullavington, Kington St Michael, Sutton Benger and Yatton Keynell
Small villages	Biddestone, Burton, Kington Langley, Langley Burrell, Lower Stanton & Stanton St Quintin, Nettleton & Seagry

	y concurrent accum		
	Total dwellings proposed for the CA:	Of which, proposed within the market town:	Of which, proposed within the remainder:
Proposed dwellings 2006-2026	4,500	4,000	500
Completed dwellings 2006-2010	894	784	110
Developable commitments	326	269	57
Proposed strategic sites	2,250	2,250	0
Proposed non- strategic site	150	150	0
Remainder to be identified (including windfall)	880	547	333

Corsham Community Area				
Wiltshire 2026 consultation (Oct-Dec 2009)				
	Total dwellings proposed for the CA:	Of which, proposed within the market town:	Of which, proposed within the remainder:	
Proposed dwellings 2006-2026	1,060	950	110	

With the reduction of the MOD in the area, there is a real opportunity to utilise this landholding to provide further employment opportunities as well as housing. Wiltshire 2026 proposed a figure of 1,060 homes. Given the opportunity to develop the town to become more self-contained, and the desire for further development in the rural settlements, it is proposed that this figure should be increased to 1,200.

In order for the town to be more self-contained the majority of this additional delivery should be within the town, and as such the proposal for the town is to deliver 1,050 homes (100 more than in Wiltshire 2026).

In Corsham Community Area remainder, the outstanding commitment for self-contained extra care homes at Royal Arthur fulfil the definition of a dwelling in this paper, and so should count against the proposed figure below. However, as this development will meet the needs of a much broader market area, rather than for Corsham Community Area alone, it would be inappropriate to include the entirety of this supply against the localised requirement. As such this development is excluded from the figures below. It will however, be included when monitoring the supply against the Housing Market Area targets, as it meets a specific need across this broader market area.

	Market Town	Corsham
Large villages Colerne & Box		Colerne & Box
Small villages Gastard, Lacock, Neston, Rudloe and Westwells		Gastard, Lacock, Neston, Rudloe and Westwells

	Total dwellings proposed for the CA:	Of which, proposed within the market town:	Of which, proposed within the remainder:
Proposed dwellings 2006-2026	1,200	1,050	150
Completed dwellings 2006-2010	508	457	51
Developable commitments	187	102	85
Remainder to be identified (including windfall)	505	491	14

Devizes Community Area					
Wiltshire 2026 consult	Wiltshire 2026 consultation (Oct-Dec 2009)				
	Total dwellings proposed for the CA:	Of which, proposed within the market town:	Of which, proposed within the remainder:		
Proposed dwellings 2006-2026	2,420	2,000	420		
Wiltshire 2026 proposed a requirement of 2,420 homes including delivery at strategic allocations. The strategic allocation included the site at Bureau West which has since been permitted for 174 dwellings. However, even with this new permission the number of houses committed within the area has declined. It is proposed that the requirement should be reduced so that the remaining requirement from Wiltshire 2026 is not increased, recognising the concerns about congestion and air quality in Devizes. The reduction will be applied to the town and so a target of 1,730 is proposed for Devizes.					
Market Town	Devizes				
Local Service Centre	Market Lavington				
Large villages	Bromham, Great Cheverell, Potterne, Urchfont, West Lavington/ Littleton Pannell & Worton				
Small villages	. .	All Cannings, Bishop Cannings, Easterton, Erlestoke, Etchilhampton, Marston & Rowde			
Wiltshire Core Strategy	<u> </u>)		
	Total dwellings proposed for the CA:	Of which, proposed within the market town:	Of which, proposed within the remainder:		
Proposed dwellings 2006-2026	2,150	1,730	420		
Completed dwellings 2006-2010	945	753	192		
Developable commitments	427	408	19		
Remainder to be identified (including windfall)	778	569	209		

Malmesbury Community Area				
Wiltshire 2026 consultation (Oct-Dec 2009)				
	Total dwellings proposed for the CA:	Of which, proposed within the market town:	Of which, proposed within the remainder:	
Proposed dwellings 2006-2026	1,110	720	390	

There was some agreement that slightly higher levels of growth could be provided within Malmesbury and the rural settlements to ensure that the economic base was maintained as well as making important key services such as schools viable and ensuring the delivery of affordable housing. This delivery should however, be weighted towards the end of the plan period, allowing the imbalance between jobs and homes to be addressed.

On this basis it is considered appropriate to increase the proposed housing allocation for the Malmesbury Community Area from 1,110 to 1,200.

The additional 90 dwellings within Malmesbury Community Area will be evenly divided between the town and the other villages in recognition of the feedback requesting more development within the villages and the need to provide more affordable housing. This equates to a proposal of 760 dwellings within Malmesbury town over the plan period, with 334 already provided and a further 139 identified deliverable commitments, leaving a residual requirement at the town of 287.

Market Town	Malmesbury
Large villages	Ashton Keynes, Crudwell, Great Somerford, Oaksey & Sherston
Small villages	Brinkworth, Charlton, Corston, Lea, Luckington, Milbourne, Minety
	& Upper Minety.

	Total dwellings proposed for the CA:	Of which, proposed within the market town:	Of which, proposed within the remainder:
Proposed dwellings 2006-2026	1,200	760	440
Completed dwellings 2006-2010	528	334	194
Developable commitments	233	139	94
Remainder to be identified (including windfall)	439	287	152

Wiltshire 2026 consult	tation (Oct-Dec 2009)			
	Total dwellings proposed for the CA:	Of which, proposed within the market town:	Of which, proposed within the remainder:	
Proposed dwellings 2006-2026	850	610	240	
due account of the area World Heritage Site. Wi supported during consu affordability issues within It was also considered t development especially Marlborough town will b	Is significant environme Itshire 2026 proposed a Itation events. This leve in the area, whilst recog hat infrastructure requir in relation to the town.	ntal constraints includ a requirement of 850 h of development will l gnising the environmer rements should be pro	omes, which was help to address the htal constraints. vided alongside future	
Market Town Marlborough				
Large villages		Broad Hinton and Ram	Isburv	
Small villages	Avebury/ Trusloe, Ax Kennett, Froxfield, Fy	Avebury/ Trusloe, Axford, Beckhampton, Chilton Folliat, East Kennett, Froxfield, Fyfield, Lockeridge, Manton, Ogbourne St George, West Overton, Winterbourne Bassett & Winterbourne		
Wiltshire Core Strateg	y consultation docum	ent (June-July 2011)		
	Total dwellings proposed for the CA:	Of which, proposed within the market town:	Of which, proposed within the remainder:	
Proposed dwellings 2006-2026	850	610	240	
Completed dwellings 2006-2010	194	145	49	
Developable commitments	215	177	38	
Remainder to be identified (including	441	288	153	

Melksham Community	Area		
Wiltshire 2026 consult			
	Total dwellings proposed for the CA:	Of which, proposed within the market town:	Of which, proposed within the remainder:
Proposed dwellings 2006-2026	2,040	1,930	110
It will be important to implement an effective economic strategy that broadens the employment base and addresses the current imbalance between homes and jobs before more homes are delivered in Melksham. The dwelling projection scenarios, whilst only indicative, suggest that the figure proposed within Wiltshire 2026 is appropriate. It is therefore considered appropriate to maintain this figure, which will provide the flexibility for Melksham Community Area to address and respond to local needs throughout the plan period. However, this requirement will be dependent upon the successful diversification of employment opportunity within the town. At April 2010, 1,269 dwellings were committed (336 complete and 933 deliverable commitments), and an estimated 119 will be delivered through windfall in the last five years of the plan period. This leaves 652 additional dwellings to be provided in the Community Area. This is a large remainder, which will be identified in a future planning document (such as a Neighbourhood Plan or a Site Allocations DPD), as well as on a number of non-strategic sites.			
Market Town	Melksham	d Comington Stooply	a Aabtan 8 M/bitlay
Large villages Small villages		nd, Semington, Steeple Jikington, Poulshot, Se	
Wiltshire Core Strateg			
	Total dwellings proposed for the CA:	Of which, proposed within the market town:	Of which, proposed within the remainder:
Proposed dwellings 2006-2026	2,040	1,930	110
Completed dwellings 2006-2010	336	309	27
Developable commitments	933	885	48
Remainder to be identified (including windfall)	771	736	35

Pewsey Community A	rea
Wiltshire 2026 consult	
	Total dwellings proposed for the CA:
Proposed dwellings 2006-2026	520
the consultation events. order that the villages a	hat some additional growth needed to be supported in the villages at Wiltshire 2026 proposed 520 homes within the Community Area. In re able to meet identified local needs and have the flexibility to litions, it is proposed to increase this to 600 homes.
Local Service Centre	Pewsey
Large villages	Burbage, Great Bedwyn, Shalbourne and Upavon
Small villages	Alton Priors/Alton Barnes, Chirton, East Grafton, Easton Royal, Ham, Hilcott, Little Bedwyn, Manningford Bruce, Marden, Milton Lilbourne, Oare, Rushall, Stanton St Bernard, Wilcot, Wilsford, Woodborough and Wootton Rivers
Wiltshire Core Strateg	y consultation document (June-July 2011)
	Total dwellings proposed for the CA:
Proposed dwellings 2006-2026	600
Completed dwellings 2006-2010	214
Developable commitments	68
Remainder to be identified (including windfall)	318

Tidworth Community Area					
Wiltshire 2026 consultation (Oct-Dec 2009)					
	Total dwellings proposed for the CA:	Of which, proposed within the market towns:	Of which, proposed within the remainder:		
Proposed dwellings 2006-2026	1,900	1,750	150		
Wiltshire 2026 proposed a figure of 1,900 homes. Given the increase in MoD personnel in the area, and the successful development of a number of important local facilities including Castledown business park, the Wellington Academy, Tesco's and Tidworth Leisure Centre, it was felt that this level of housing development would help support create a better more sustainable community in Tidworth and Ludgershall. This level of growth will also benefit from a number of PDL military sites and utilise the opportunity to create a better level of self containment for non-military members of the community.					
Market Town	hire 2026 will be maintained. tet Town Tidworth and Ludgershall				
Large villages	Netheravon and Colli				
Small villages	Collingbourne Kingsto	on, Enford and The Ch ver Chute & Upper Ch			
Wiltshire Core Strategy	consultation docum	ent (June-July 2011))		
	Total dwellings proposed for the CA:	Of which, proposed within the market towns:	Of which, proposed within the remainder:		
Proposed dwellings 2006-2026	1,900	1,750	150		
Completed dwellings 2006-2010	286	222	64		
Developable commitments	735	722	13		
Proposed strategic sites	550	550	0		
Remainder to be identified (including windfall)	329	256	73		

Trowbridge Communit	Trowbridge Community Area				
Wiltshire 2026 consultation (Oct-Dec 2009)					
	Total dwellings proposed for the CA:	Of which, proposed within Trowbridge:	Of which, proposed within the remainder:		
Proposed dwellings 2006-2026	5,920	5,660	260		

The proposed requirement of 5,920 homes in Wiltshire 2026 has been minimally increased to 6,000 in order that the strategic site to the South of Trowbridge can be delivered along with the associated infrastructure improvements and employment.

Owing to the limited number of villages within the Community Area outside of Trowbridge it is considered appropriate to make only a small allowance in line with historic trends for delivery in these settlements. This results in a proposal of 5,860 for Trowbridge town.

Principal Settlement	Trowbridge
Large villages	North Bradley, Southwick and West Ashton
Small villages	Yarnbrook

	Total dwellings	Of which, proposed	Of which, proposed	
	proposed for the	within Trowbridge:	within the remainder:	
	CA:			
Proposed dwellings	6,000	5,860	140	
2006-2026				
Completed dwellings	1,075	998	77	
2006-2010				
Developable	1,843	1,829	14	
commitments				
Proposed strategic	2,650	2,650	0	
sites				
Remainder to be	432	383	49	
identified (including				
windfall)				

Warminster Community Area			
Wiltshire 2026 consultation (Oct-Dec 2009)			
	Total dwellings proposed for the CA:	Of which, proposed within the market town:	Of which, proposed within the remainder:
Proposed dwellings 2006-2026	1,770	1,650	120

There was general consensus that the figures are about right especially if growth is linked to new jobs in the area.

There was some appetite for more accommodation in villages (particularly Corsley) but that this would need to be supported by additional employment opportunities in these areas. It is believed that this should be facilitated through revisions within the settlement strategy, which will allow a more flexible development strategy in the villages.

The proposal of 1,650 dwellings within Warminster town will be maintained along with the proposed mixed-use strategic site. Along with commitments this will leave a requirement of only 227 dwellings, the majority of which are anticipated to be delivered on windfall sites within the last five years of the plan period.

Market Town	Warminster
Large villages	Codford, Corsley & Heytesbury
Small villages	Chapmanslade, Chitterne, Crockerton, Horningsham, Longbridge Deverill, Maiden Bradley, Stockton & Sutton Veny

	Total dwellings	Of which, proposed	Of which, proposed
	proposed for the	within the market	within the remainder:
	CA:	town:	
Proposed dwellings 2006-2026	1,770	1,650	120
Completed dwellings	225	172	53
2006-2010			
Developable	418	390	28
commitments			
Proposed strategic	900	900	0
sites			
Remainder to be	227	188	39
identified (including			
windfall)			

Westbury Community Area				
Wiltshire 2026 consultation (Oct-Dec 2009)				
	Total dwellings proposed for the CA:	Of which, proposed within the market town:	Of which, proposed within the remainder:	
Proposed dwellings 2006-2026	1,390	1,290	100	
Wiltshire 2026 proposed 1,390 homes. Given the number of completions and commitments in the area this is still considered appropriate, and there was no support for reducing this figure at the consultation event. Therefore this figure will be maintained. Of this allowance, the 1,290 proposed in Westbury town will be maintained from Wiltshire 2026.				
Market Town	Westbury			
Large villages	Dilton Marsh and Bratton			
Small villages	Edington			
Wiltshire Core Strategy	<pre>/ consultation docum</pre>	ent (June-July 2011))	
	Total dwellings proposed for the CA:	Of which, proposed within the market town:	Of which, proposed within the remainder:	
Proposed dwellings 2006-2026	1,390	1,290	100	
Completed dwellings 2006-2010	503	468	35	
Developable commitments	337	323	14	
Remainder to be identified (including windfall)	550	499	51	

Royal Wootton Bassett and Cricklade Community Area			
Wiltshire 2026 consultation (Oct-Dec 2009)			
	Total dwellings proposed for the CA:	Of which, proposed within the market town:	Of which, proposed within the remainder:
Proposed dwellings 2006-2026	1,250	920	330

Given the proximity of the Royal Wootton Bassett & Cricklade Community Area to Swindon it is likely to be significantly affected by the long-term growth at the Borough. Equally the relationships that towns such as Royal Wootton Bassett and Cricklade, as well as the rural areas of Purton and the Lydiards, have with Swindon will require careful planning. The targeted consultations recognise the dormitory role that Royal Wootton Bassett has with Swindon and agree that increasing the towns self-containment is an important part of the strategy for the long term development of the town. Furthermore, growth in the town was generally accepted as a means to address the current imbalance between homes and jobs and to help to improve the self-containment of the town as well as providing the opportunity to deliver affordable housing.

It is clear from the community responses that although the focus is rightly aimed at Royal Wootton Bassett, this should not be at the expense of the smaller towns and rural areas. The need to ensure flexibility to enable local communities to deliver growth in response to local needs and aspirations should be part of the long-term strategy for the Community Area. It is not considered necessary to revise the scales of growth proposed in Wiltshire 2026 (of 1,250 homes). In rural areas the appropriate scale of growth should be determined locally through engagement with localities in the preparation of a site allocation Development Plan Document and / or through local Neighbourhood Plans.

Cricklade Town Council has identified a need for there to flexibility to be able to deliver housing within the town. There are still 134 homes to be identified within the Community Area remainder, which provides an allowance for delivery in Cricklade. Furthermore, the requirement does not provide a ceiling for development, and if the community believe additional delivery is appropriate, then this will be able to be delivered through a neighbourhood plan.

Market Town	Royal Wootton Bassett
Local Service Centre	Cricklade
Large villages	Lydiard Millicent, Lyneham & Purton
Small villages	Bradenstoke, Broad Town, Hook, Latton & Purton Stoke

	Total dwellings proposed for the CA:	Of which, proposed within the market town:	Of which, proposed within the remainder:
Proposed dwellings 2006-2026	1,250	920	330
Completed dwellings 2006-2010	283	153	130
Developable commitments	625	559	66
Remainder to be identified (including windfall)	342	208	134