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Our Ref: PINS/Y3940/429/9]

Your Ref: AC/PT

Date: 23rd December 2013

Dear Mr Cunningham,

Wiltshire Core Strategy

Thank you for your letter dated 19th December 2013. I am pleased that positive progress appears capable of being made with regard to the content of the plan, its justification and the Examination as a whole.

Housing

Your suggestion that the references to 37,000 homes be replaced with 42,000 homes seems reasonable. This will require a disaggregation of the revised housing figure across the three HMAs and, as you mention, this will necessitate a redrafting of Core Policy 2.

I note your proposed approach towards the distribution of growth across the HMAs which seems logical. It is important for the Core Strategy to provide a proportionate level of detail of, in simple terms, what new development is intended to go where and, amongst other documents, the SA, the HRA and the SHLAA will be informative to this process. With this in mind, the issue of further disaggregation of the housing supply at the level of community areas is a matter that I would wish the Council to lead upon.

Provided an adequate housing land supply can be demonstrated, I consider currently that the proposed alterations to the LDS to accommodate a Sites Allocation DPD will provide an effective mechanism, subject to public involvement and independent examination, by which the level of specific detail for each community area over the plan period can be resolved. Indeed, I assume that the Council will retain its intention for an early review of the CS within the revised LDS. Consequently, I consider that there may be scope for a broader and more flexible approach within the CS towards the disaggregation of housing across community areas within each HMA, particularly as many potential developments may fall to be realised later in the current plan period. Thus the Council may wish to come to a view as to whether prescriptive



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minimum housing 'targets' for each community area are necessary at this stage. Clearly, the CS needs to be internally consistent and any redrafted Core Policy 2 must reflect the intentions of the Council's strategy as a whole and Core Policy 1.

I will therefore be pleased to receive an update upon the housing provision of the Core Strategy, its disaggregation, the housing land supply and trajectory with supporting evidence at the earliest opportunity.

Affordable Housing

Your suggested approach towards reviewing the evidence that has informed Core Policy 43 seems sensible. It seems logical that this will be undertaken in the knowledge of my earlier comments and also the submissions made to the CS and in relation to the Hearing for Matter 4 'Housing'.

Gypsy and Travellers

I welcome the intention to provide further evidence upon the issue of Gypsy and Travellers and note your intention to update Topic Paper 16 which should be of particular use. I assume from your letter that you intend the new GTAA would follow the update to the Topic Paper but would not be available to inform the currently submitted CS.

If that is the case, then it is important for the Council to be able to show as far as is practicable and proportionate, within the proposed addendum, how the CS is consistent with national policy, particularly the 'Planning policy for traveller sites' (especially Policies A to D). Such work should also identify how, albeit in an interim fashion until the GTAA is complete, the Council will adopt a positive approach towards the gypsy and travelling community. In the interests of clarity and to aid future decision making in the shorter term, it may be necessary for the Council to acknowledge within the CS any absence of a requisite land supply until such time as the GTAA and the proposed DPD are completed.

Please note however, that I can give no assurance at this time that such an approach will be adequate for the purposes of my examination. The details will be determinative.

Chippenham

In light of your comments, I would be pleased to receive any suggested changes from the Council to the CS and Core Policy 10 in particular.

Settlement Boundaries and Retail Frontages

In light of my previous correspondence, I would be most interested at the speed by which both of these important matters can be resolved satisfactorily. Undue delay in identifying robust boundaries and frontages may weaken the overall approach of the CS in the context of national policy. The content of the revised LDS, which I note will be available in draft shortly, will be important in these regards.

It would appear that there may be a practical and reasonable way forwards in relation to the current Examination. I look forward to receiving further details of the Council's work programme which will help to deliver the matters referred to above. I remain anxious to expedite the Examination process in an efficient manner although there may be a necessity for further hearings if the consultation processes, that will invariably be required, and matters arising cannot be dealt with adequately by way of written representation.

Yours sincerely,

Andrew Seaman

Senior Housing and Planning Inspector