

Wiltshire Council

Council

20 February 2018

Question from Mrs Jacqui Clark on behalf of the Hilperton Gap Action Group

To Councillor Toby Sturgis, Cabinet Member for Spatial Planning, Development Management and Property

Question (P18-01)

Please could the Council explain why it has four work streams going on at the same time to determine where housing development should go?

1. You say¹ that you will, at Step 8d of the **Local Plan Review** in Quarter 3 of 2018, select preferred sites for housing and employment.
2. But then you say² that the **Joint Spatial Framework** will identify broad locations for development - and this is not due to be completed until the middle of 2019³.

So I ask – how it is possible to select “preferred sites” nine months before you have identified “broad locations?”

3. Meanwhile, your **Wiltshire Housing Sites Allocation Plan**, which is allocating new sites for housing will be submitted in Quarter 2 of 2018⁴.

And so I also ask – what is the point of the **Local Plan Review** and the **Joint Spatial Framework** if, by the time they are completed, you have already decided exactly where all the houses are going?

4. And there’s more! At the same time, in some other corner of this building, you also have your **Strategic Housing And Land Availability Assessment** trundling along. This produces a report at the end of every year to select sites for development. Not only is this work in parallel, it produces different answers. For example, the **WHSAP** rejected site 293 in the Hilperton Gap for development because it “has a number of issues that may not be capable of mitigation”⁵. Yet across the office, the **SHALAA** team have decided that this

¹ *Joint Spatial Framework: Issues Paper* pages 9 & 24

² *Joint Spatial Framework: Issues Paper* page 7

³ *Joint Spatial Framework: Issues Paper* page 9

⁴ <http://www.wiltshire.gov.uk/planning-whsap>

⁵ Trowbridge CA Topic Paper page.16

site is “Suitable, Available, Achievable, Deliverable, Developable, No constraints.”⁶

This nonsense is causing great concern to the ordinary people of Trowbridge and is clearly wasting our money. Please can you tell us in writing how and when it will be sorted out?

Table 2.1 Aligned Local Plan Review and Joint Spatial Framework Timetable

STAGE		Local Plan Review	Links	Joint Spatial Framework	WHSAP	SHELAA
2017	Q1	Plan Preparation & Evidence Gathering		Preparation & Evidence Gathering	Formal Draft Plan Preparation	5 Stage Analysis of Sites
	Q2 1-3				Formal Consultation	
	Q3				Submission Draft inc. Selection of housing sites	Selection of available sites
	Q4 4	Issues & Options Consultation (Regulation 18)		Scoping & Methodology Consultation		
2018	Q1	Plan Preparation & Evidence Gathering		Draft Framework Preparation	Submission to SoS	5 Stage Analysis of Sites
	Q2 5-8			Draft Framework Consultation Commences	Examination in Public & Confirmation of sites	
	Q3			Step 8d - Selection of Preferred Sites	Adoption	
	Q4 9	Preferred Options Consultation (Regulation 18)		Final Framework Preparation		
2019	Q1 10	Submission Draft Plan Preparation		Identification of 'broad locations' for development		5 Stage Analysis of Sites
	Q2 11	Submission Draft Plan Consultation (Regulation 19) Commences		Completion of Framework		
	Q3	Final Submission Plan Preparation				
	Q4					
2020	Q1	Submission (Regulation 22)				5 Stage Analysis of Sites
	Q2	Examination Process				
	Q3					
	Q4	Inspector's Report & Confirmation of sites				
2021	Q1	Adoption				

Response

Submission of the draft Wiltshire Housing Site Allocations Plan is due to be considered by Cabinet and Council at their respective meetings in May 2018 consistent with the timeline for submission of the Plan in Quarter 2 of 2018. This Plan is being prepared in accordance with the Wiltshire Core Strategy (Adopted 2015). One of its purposes is to allocate new sites to ensure that a five-year supply of housing land in each of Wiltshire’s Housing Market Areas can be maintained in the period to 2026 consistent with the Government’s National Planning Policy Framework (NPPF). The housing identified within this Plan will therefore contribute towards meeting the housing requirements set out in the Wiltshire Core Strategy.

⁶ SHALAA Appendix 5.17 Trowbridge CA page90

Like other Local Planning Authorities, Wiltshire Council needs to maintain an up to date Local Plan and Government has recently set out in legislation that plans should be reviewed every 5 years. As the Wiltshire Core Strategy was adopted in January 2015, the Council has already commenced the review of the Wiltshire Core Strategy, which is known as the Local Plan Review, and will cover the period to 2036 (10 years beyond the current Core Strategy plan period). This plan will therefore include new housing requirements relating to the period 2016 to 2036 that will need to be planned for. As such additional sites will be needed over and above those identified through the Wiltshire Housing Site Allocations Plan.

The Swindon and Wiltshire Joint Spatial Framework (JSF) is being prepared together with Swindon Borough Council. As you point out, its purpose is to identify broad locations for growth across Wiltshire and Swindon that will inform the Councils' respective Local Plan Reviews. The JSF is not programmed for completion until the Pre-submission Draft Plan is finalised for consultation (Quarter 2, 2019). It will then form part of the evidence supporting the content of the Pre-submission Draft Plan and as such will be open for comment at that time.

The preparation of the JSF, alongside the Local Plan Review, allows one to inform the other in an iterative way. The iterative process allows for more rigorous testing of the scales of growth suggested in the draft JSF to ensure the most sustainable outcomes for Wiltshire can be achieved as more detailed information becomes available through the consultations on the Local Plan Reviews. The potential need to have a greater separation between the JSF and the Local Plan Review programmes has been raised through the recent consultation. This will be given further consideration when Officers report to Cabinet later this year on the Draft JSF.

With regard to the Strategic Housing and Economic Land Availability Assessment (SHELAA), this is a register of sites usually put forward for development by landowners and developers and is a requirement of the NPPF. It is periodically updated and helps understand what sites are theoretically available for housing and/or employment development. Currently, it is not produced on an annual basis. These sites are only assessed at a high level and provide a general indication as to their potential suitability, availability and achievability but the SHELAA does not go into the level of detail used in plan making. The SHELAA therefore forms a starting point for the overall assessment of sites being considered for allocation. The preparation of the draft Wiltshire Housing Site Allocations Plan drew on this register to formally allocate the best possible sites for housing development. Although site 293 (Land in the Hilperton Gap) was considered as part of the plan making process it was ruled out following a more detailed consideration of the site.

We will be reviewing how the SHELAA is presented prior to its next update to avoid any future confusion.