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# Wiltshire Housing Site Allocations Development Plan Document

Hearing Statement on Behalf of Barratt Homes  
Matter 2 – Consistency with the Wiltshire Core Strategy (WCS)

March 2019



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Development Plan Document**

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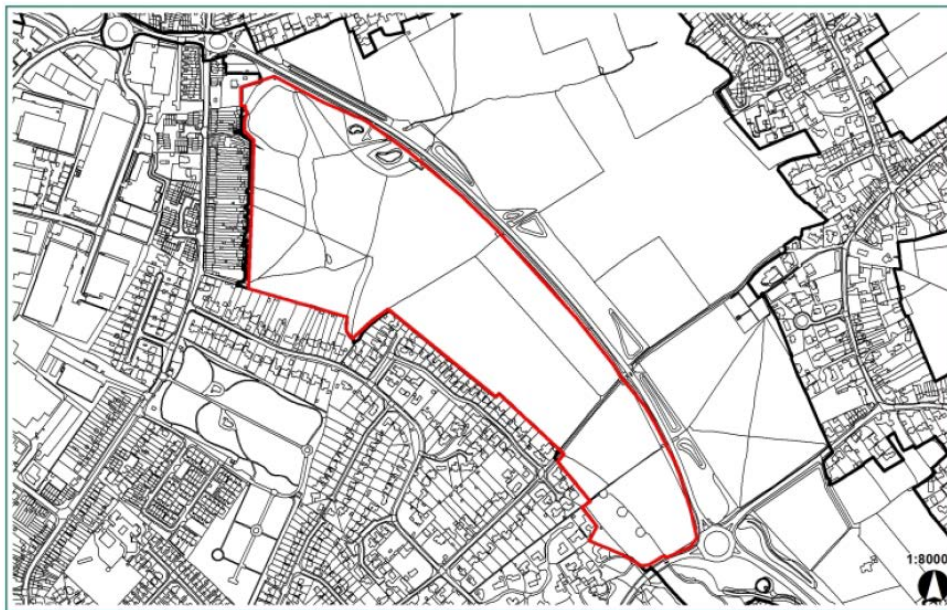


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## 1.0 INTRODUCTION

- 1.1 This Hearing Statement has been prepared on behalf of Barratt Homes in relation to the Wiltshire Housing Site Allocation Development Plan Document (WHSAP), and their land interests at Elizabeth Way, Trowbridge. A location plan of the entire allocation site is included below, Barratt Homes land parcel is the central quadrant.



- 1.2 The proposed allocation at Elizabeth Way has not been formally included as a policy and is instead identified within the Wiltshire Housing Site Allocations Plan (July 2018) for approximately 205 dwellings. This figure has since been amended within the Trowbridge Topic Paper (updated September 2018) to deliver approximately 355 dwellings, which was consulted upon through the Focussed Consultation in September 2018. It is assumed that the policy wording below will supersede that set out within the submitted Wiltshire Housing Site Allocations Plan (July 2018) and therefore at this stage the policy proposes the delivery of approximately 355 dwellings, our representations are made on this basis.
- 1.3 This Hearing Statement on Matter 2, focuses on how consistent the Wiltshire Housing Site Allocations Development Plan Document is with the adopted Wiltshire Core Strategy.

## 2.0 RESPONSE TO MATTER 2 – CONSISTENCY WITH THE WILTSHIRE CORE STRATEGY (WCS)

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

- 2.1 The purpose for the production of the Wiltshire Housing Site Allocations Plan was to ensure that Wiltshire Council maintained a 5 year housing land supply throughout the plan period, up to 2026. A number of the strategic allocations identified through the Wiltshire Core Strategy have either not come to fruition or have been delayed. Wiltshire Council were therefore required to undertake a review of further potential sites for residential development in order to maintain a steady rate of housing delivery across the district.
- 2.2 The adopted Core Strategy made provision for at least 42,000 new homes in Wiltshire, and the spatial vision set out within the plan stated that;

**“By 2026 Wiltshire will have stronger, more resilient communities based on a sustainable pattern of development, focused principally on Trowbridge, Chippenham and Salisbury...”**

- 2.3 Core Policy 1 of the Core Strategy sets out the Settlement Strategy which identifies the different tiers of settlements within Wiltshire based on their role and function, with Core Policy 2 ‘Delivery Strategy’ seeking to deliver the strategy in a sustainable manner. Paragraph 4.20 of the Core Strategy states:

**“In order to support the most sustainable pattern of growth, in line with the principles defined in Core Policy 1, indicative requirements are provided for each Principal Settlement, Market Town and by Community Area within paragraph 4.26 below. The indicative figures also allow a flexible approach which will allow the council including through the preparation of the Site Allocations DPD and local communities preparing neighbourhood plans to respond positively to opportunities without being inhibited by an overly prescriptive, rigid approach which might otherwise prevent sustainable development proposals that can contribute to delivering the strategic objectives of the plan.”**

- 2.4 Paragraph 4.26 of the Core Strategy sets out the ‘indicative requirement’ for development at strategic level for each Community Area, including the higher tier settlements within each area. The Wiltshire Core Strategy also divides housing provision between the 3

HMA's (East HMA, North and West HMA, and South HMA). It is then against these HMA's that housing supply is assessed, and 5 year housing land supply calculations are based.

- 2.5 We consider that the Site Allocations Plan has made a positive attempt to address the housing delivery issues by seeking to ensure that the areas with the largest deficits are supported through this plan. However, through these endeavours we consider that Wiltshire Council have been overly cautious with regards to the amount of housing proposed through the Plan. We would like to emphasise that the Core Strategy was adopted based on the fact that at least 42,000 dwellings (41,100 dwellings specifically within Wiltshire) were delivered over the plan period, it was not intended to be a ceiling amount by the Inspector.
- 2.6 The residual level of development required within the settlement of Trowbridge is 2,230 dwellings, set out within Table 2.3 of the Trowbridge Topic Paper (Updated September 2018). The proposed allocation sites that have been identified through the Site Allocations Plan amount to a total of 1,050 dwellings. We consider that on review of 'Table 2.3 - Housing requirement for Trowbridge Community Area' the completions and developable commitments seem realistic, yet there is still a significant shortfall of approximately 1,180 dwellings which has yet to be identified within Trowbridge.
- 2.7 Trowbridge is classed as a 'principle settlement' within the Core Strategy settlement hierarchy and therefore should be the primary focus for delivery in order to meet the housing deficit. We do not consider that Wiltshire Council have fully utilised Trowbridge in order to ensure the delivery of their minimum housing requirement as set out in the Core Strategy.
- 2.8 We consider that the proposed number of dwellings for Land at Elizabeth Way is an inefficient use of the land and would result in the under delivery of housing on a site of this scale. Technical documents have been produced for each of the land holdings at Elizabeth Way and have taken all of the site constraints into consideration, with this in mind the masterplan for the overall site indicates that approximately 400 - 450 dwellings could be accommodated on the site.

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

- 2.9 In order to be consistent with the Core Strategy the overall distribution of housing allocations must accord with the underlying principles in terms of directing development to the most suitable and sustainable locations. The Site Allocations Plan bases its



assessment of sites around the settlement hierarchy (Core Policy 1) within each of the three HMA's. Therefore, although the minimum housing requirement for each of the HMA's may have been met, there are still largely unmet needs within the most sustainable locations, such as Trowbridge.

- 2.10 We do not consider that the distribution of site allocations fully accords with the Core Strategy spatial strategy and objectives. Those Community Areas with an indicative residual requirement were targeted through the Site Allocations Plan, yet areas which were considered to have already 'met' this residual requirement (based on the Core Strategy figures) were dismissed from further consideration.
- 2.11 Trowbridge is identified as a principle settlement within the Wiltshire Core Strategy hierarchy (Core Policy 1) and therefore considered as one of the most sustainable towns in Wiltshire. The main point of contention that we would like to raise is that the residual requirement identified for Trowbridge of 2,230 dwellings has not been met in full through this process. The proposed allocation sites that have been identified through the Site Allocations Plan for Trowbridge amount to a total of 1,050 dwellings, therefore there is still a significant shortfall of approximately 1,180 dwellings which has yet to be identified.
- 2.12 We consider that the Site Allocation Plan process has failed in this location as Wiltshire Council have not utilised or met the rising need within one of their principle settlements.

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

- 2.13 The Wiltshire Housing Site Allocations Plan site selection process is not sound as it is not positively prepared, justified, effective, nor consistent with national policy on housing delivery and plan making. The plan should be prepared based on the Wiltshire Core Strategy objectives which seeks to meet the objectively assessed housing need by the end of the plan period, up to 2026.
- 2.14 Less than half of the indicative housing requirement allocated for delivery within Trowbridge has not been met, therefore proving that the draft plan proposals have not been consistently prepared using the evidence gathered.
- 2.15 As mentioned above, the plan does not propose to make efficient use of land to be allocated through the Site Allocations Plan by increasing numbers where possible, which is unsustainable and not consistent with National Policy.

- 2.16 We have submitted representations to each stage of the plan process seeking the Council to address this issue and maximise sustainable development opportunities within Trowbridge.