

# Wiltshire Housing Site Allocations Plan (WHSAP) Examination Matter 2 Issue 3

Submission on behalf of R D Horton and Son  
ID1125714



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## Introduction

1. McLoughlin Planning has been instructed by R D Horton and Son (respondent) to submit representation on the Wiltshire Housing Site Allocations Plan (WHSAP) in respect of Matter 2: Consistency with the Wiltshire Core Strategy (WCS), Issue 3

### ***Question 3. 1 - Does the distribution of site allocations accord with the spatial strategy in the WCS?***

2. The representation will set out that it is the respondent's position that the WHSAP has failed to allocate enough housing at Large Villages, and that there is currently a shortfall of provision at the East Housing Market Area. The representation deems that the plan has failed to take a consistent approach regarding site allocations, and as a result the WHSAP is unsound in the context of Paragraph 182 of the NPPF. As a result, the purpose of this submission is to set out why it is necessary to revisit the Plan and seek to further review the distribution of site allocations.
3. The NPPF sets out the tests of soundness for a Plan at Paragraph 182 positively prepared, justified, effective and consistent with national policy. The key consideration aspect in relation to the WHSAP, is the point of whether the distribution of housing across Wiltshire has been 'positively prepared' to meet objectively assessed development, or 'Justified' taking into account reasonable alternatives and formulated on proportionate evidence. The key documents within the Evidence Base for addressing this (and the other questions posed on Matter 2, Issue 3) are:
  - Marlborough Community Area Topic Paper, September 2018 – CATP.08a.
  - Marlborough Community Area – SHELAA 09 (site 3207)
4. The WHSAP was produced following the adoption of the Wiltshire Core Strategy (WCS), to help ensure the area of Wiltshire has a sufficient supply of suitable housing sites across the plan period (paragraphs 1.1 and 1.4 emphasise this point in particular). In achieving this, the Plan looks to revise settlement boundaries across the Principal Settlements of Salisbury and Trowbridge, Market Towns, Local Service Centres and Large Villages, and allocate new sites for housing in order to maintain a five year land supply in each of the Housing Market Areas.
5. In the context of Broad Hinton, Core Policy 14 (Spatial Strategy: Marlborough Community Area) of the WCS, identifies Broad Hinton as a 'Large Village'.

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6. The identified WHSAP housing requirement is divided across three Housing Market Areas (HMAs), East Wiltshire, North and West Wiltshire, and South Wiltshire. Table 2.1 of the WHSAP, identifies that the minimum housing requirement is 5,940. Thereby allowing additional development over this figure.
7. Table 4.9 of the WHSAP, sets out the Distribution of housing development within the East Wiltshire HMA, between the 'Urban areas' and 'Rural areas'. The table establishes that within the 'Marlborough CA remainder' (which Broad Hinton is located within) there is a shortage of 14.1%, which equates to 34 dwellings.
8. Given this shortfall in the Marlborough CA, it follows that the WHSAP should be looking to make allocations in the affected CA. The lack of any allocations elsewhere in the CA raises doubts as to whether the WHSAP DPD is distributing allocations in accordance with the spatial strategy in the WCS.

### **Question 3.2 – Is the distribution within each HMA consistent with the WCS?**

9. It is the respondent's position that the distribution within the Eastern HMA is not consistent with the WCS. The WCS makes provision for at least 42,000 new homes in Wiltshire between the period 2006 to 2026, split across the three HMAs. The WCS Core Policy 1 (Settlement Strategy) identifies four tiers of settlements to distribute the housing across each HMAs.
10. The HMA of East Wiltshire has a minimum housing requirement of 5,940 dwellings. Table 4.9 within the WHSAP sets out how the 5,940 dwellings would be distributed throughout the Urban and Rural areas of Devizes, Marlborough, and Tidworth and Ludgershall. The WCS ranks these three settlements within the same category under Core Policy 1, however the Marlborough urban area has only 15% of the housing distribution at a shortage of 2.6%. Likewise, Marlborough CA remainder has 16% of the housing distribution of the rural areas with a shortage of 14.1%. The two figures representing an uneven disproportion of housing across the East Wiltshire HMA.
11. Whilst it is recognised in the WCS and WHSAP that there is flexibility in the treatment of CA level housing figures in that there is the ability to increase figures in one CA to meet needs of another CA, it follows that the figures for each CA, should be met, or at the very minimum, the reasons why they are not met are fully documented with appropriate evidence.

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**Question 3.3 – Is the approach set out in Stages 1 and 2 of the site selection process justified? In particular, has a consistent and justified approach been taken to excluding specific locations from the scope of the exercise?**

In response to questions 3.1 and 3.2, the respondent's position has been to raise concerns about the distribution of site allocations at the Spatial Strategy and HMA level. In responding to this question, it is the respondent's position that the process outlined in Stages 1 and 2 in regard to the selection of sites in the Marlborough CA is flawed in that decisions made to not allocate development sites have not been justified because the evidence base does not support the conclusions.

12. Core Policy 2 (Delivery Strategy) establishes that development boundaries can be amended as part of the WHSAP, as reflected in Paragraph 4.13 of the WCS, which states that the settlements contained within the four tiers will be reviewed as part of the WHSAP or Neighbourhood Plans in order to ensure these boundaries are up to date.
13. In respect of Broad Hinton, the WHSAP identifies under Paragraph 4.13 that the spatial strategy requires new housing development at large villages to be limited to that needed to help meet the housing needs of the settlements. However, in the subsequent Paragraph (4.14), the plan identifies that the "opportunities at some Large Villages have not been explored". Therefore, there should be some form of evidence document to support this conclusion.
14. In this case, paragraphs 4.5 and 4.14 makes the claim that housing needs have been met. In this instance, none of the documents identified in response to question 3.1 show that the needs have been met and the data available for the Marlborough Community Area (HSA4.0) shows that in September 2016, there were 54 houses in the CA which were on the waiting list for social housing. This shows the evidence base conflicting with the methodology set out in the WHSAP.
15. Another concern with the lack of allocations and under-delivery in the Marlborough CA is that housing could come forward if a Neighbourhood Plan was produced, if there is no appetite for a Neighbourhood Plan (for whatever reason) this again can hinder the delivery of housing in the CA. Broad Hinton, in this case does not have a Neighbourhood Plan.

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16. Representation was made at Broad Hinton under Site Reference 3207 (Land North of Broad Hinton). The SHELAA established that the site was Suitable, Achievable, Available, Deliverable and Developable.

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

17. In light of the above, it is the respondent's position that whilst the para 4.5 of the WHSAP mirrors paragraph 4.5 of the WCS in allowing for flexibility, this does not necessarily mean that this should be automatic. Community Areas in the WHSAP should make every effort in meeting its housing requirement before thinking about meeting the shortfall elsewhere.
18. As set out above, the Marlborough CA is underperforming in meeting its housing targets, there is a documented shortfall. Whilst this shortfall is absorbed by allocations in other Community Areas in the Eastern HMA, this approach is not justified in light of the evidence presented in this response, in that:
- There is a housing need in the Marlborough Community Area, which is unmet.
  - The evidence base shows that there are deliverable sites in the CA, at Broad Hinton (e.g., the respondent's land at site 3207).
19. As a result, the site selection process should be revisited to ensure that housing needs in the Marlborough CA are met.