

RIDGE

**WILTSHIRE HOUSING SITE
ALLOCATIONS PLAN
EXAMINATION: RESPONSE TO
INSPECTOR'S INITIAL MATTER 2
EDENSTONE HOMES
ID: 1187893
March 2019**

**WILTSHIRE HOUSING SITE ALLOCATIONS PLAN EXAMINATION
RESPONSE TO INSPECTOR'S MATTER 2: CONSISTENCY WITH THE
WILTSHIRE CORE STRATEGY
EDENSTONE HOMES**

March 2019

Prepared for

Edenstone Homes
Building 102
Wales 1 Business Park,
Magor
NP26 3DG

Prepared by

Ridge and Partners LLP
Thornbury House
18 High Street
Cheltenham
Gloucestershire
GL50 1DZ

Tel: 01242 230066

Job No. 5007831

CONTENTS

1. INTRODUCTION	4
ISSUE 2: DOES THE WHSAP MAKE ADEQUATE PROVISION TO MEET HOUSING REQUIREMENTS AS SET OUT IN THE WCS?	5
Q2.1 The WCS contains housing figures at a County, HMA and settlement level. Which is the most appropriate scale at which to consider provision in order to assess consistency with the WCS?	5
Q2.2 Based on the most up to date evidence, what is the residual level of development required to meet the housing requirement identified in the WCS? What component of this is the WHSAP expected to meet?	6
Q2.3 Are the components of delivery identified in the Plan, including completions, committed developments and windfalls, justified and realistic?	7
Q2.5 Is the predicted delivery of allocated sites realistic in terms of the contribution they would make through the Plan period?	7
Q2.4 In light of the above, does the WHSAP make adequate overall provision to ensure the delivery of the minimum housing requirement as set out in the WCS?	10
ISSUE 3: DOES THE DISTRIBUTION OF SITE ALLOCATIONS ACCORD WITH THE SPATIAL STRATEGY SET OUT IN THE WCS?	11
3.1 Is the overall distribution of housing allocations consistent with the spatial strategy set out in the WCS?	11
3.2 Is the distribution within each HMA consistent with the WCS?	11
3.3 Is the approach set out at 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?	14
Q3.4 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?	15
APPENDIX 1: PIONEER REPORT – HOUSING NEEDS CRUDWELL	
APPENDIX 2: COMMENTARY ON DELIVERABILITY OF SAVED LOCAL PLAN ALLOCATIONS	
APPENDIX 3: COMMENTARY ON DELIVERABILITY OF PROPOSED ALLOCATIONS	

1. INTRODUCTION

- 1.1. Edenstone Homes Ltd¹ have promoted the site known as Land at Ridgeway Farm, Crudwell throughout the preparation of the Wiltshire Housing Site Allocations Plan (WHSAP).
- 1.2. The site was originally proposed as an allocation in the draft WHSAP under reference H2.13. Following the Full Council meeting on 10th July 2018, it was resolved to submit the plan to the Secretary of State for Examination with a Schedule of Proposed Changes which deleted the site allocation H2.13. It is acknowledged that the purpose of the Examination is not to consider the soundness of omission sites; however, Edenstone remains concerned regarding the plans consistency with the Wiltshire Core Strategy (WCS) and general matters surrounding the Council's approach to site selection and distribution of housing.
- 1.3. This responds to Matter 2 which relates to the consistency of the WHSAP with the WCS with particular reference to the North and West Housing Market Area (NWWHMA).

¹ Respondent ID: 1187893

ISSUE 2: DOES THE WHSAP MAKE ADEQUATE PROVISION TO MEET HOUSING REQUIREMENTS AS SET OUT IN THE WCS?

Q2.1 The WCS contains housing figures at a County, HMA and settlement level. Which is the most appropriate scale at which to consider provision in order to assess consistency with the WCS?

1.4. It is considered that the most appropriate scale at which to consider provision is by Housing Market Area (HMA), rather than at the community area level. This is supported by the Inspector's report into the WCS² whereby Paragraph 43 states:

"The CS is clear that the distribution of housing land in terms of ensuring adequate supply will be disaggregated in accordance with three housing market areas. I am satisfied, based on the broad assessments of housing need, that such an approach is an appropriate scale for consideration rather than the smaller community areas which would limit the flexibility and effectiveness of the plan. I am also satisfied that the identification of indicative levels of housing for Community Areas is not unduly rigid or prescriptive; such an approach will enable suitable flexibility to be applied by the Council in managing the effective delivery of necessary housing within the HMAs."

1.5. Para 83 of that report also states:

"The evidence supports the CS disaggregation of new housing across the three HMAs of the county which is sound and the effectiveness of the plan is maintained by not inflexibly distributing housing at the more micro level of each Community Planning Area."

1.6. Therefore, it is considered that the WHSAP should make provision to meet its housing requirement at HMA level in line with the intention of the WCS.

1.7. It is therefore considered that draft WHSAP approach to focussing allocations on community areas where land supply falls short of the indicative levels set by the WCS is fundamentally contrary to the WCS approach to meeting housing needs.

² Wiltshire Core Strategy, Inspector's Report December 2014

Q2.2 Based on the most up to date evidence, what is the residual level of development required to meet the housing requirement identified in the WCS? What component of this is the WHSAP expected to meet?

- 1.8. The purpose of the WHSAP is to ensure that enough land is allocated to meet the minimum requirements of each HMA over the plan period.
- 1.9. The Council's Housing Land Supply Statement (HLSSS)(March 2018),appendix 6, identifies an indicative requirement for 1,892 dwellings remaining to be delivered in the NWWHMA to meet the requirements of the Core Strategy up to 2026. The Council subsequently prepared a HLS addendum (Topic Paper 3) in July 2018 which provides an updated provision and identifies a reduced indicative residual requirement for the NWWHMA as 1,109 dwellings up to 2026.
- 1.10. |In response to question 2.3 and 2.5 below, we are concerned that the components of delivery identified in the Plan are not justified or realistic and will not meet the housing requirement identified in the WCS over the remaining plan period.

Q2.3 Are the components of delivery identified in the Plan, including completions, committed developments and windfalls, justified and realistic?

Q2.5 Is the predicted delivery of allocated sites realistic in terms of the contribution they would make through the Plan period?

Commitments

- 1.11. We have some concerns that the rates of delivery for the proposed committed sites are not realistic in the NWWHMA as set out in the HLSS³ as well as the HLS addendum⁴.
- 1.12. For example, the proposals at Langley Park, Chippenham were granted outline planning permission for 400 residential dwellings in January 2017⁵. Reserved Matters have yet to be submitted. The site has issues with contamination that will need to be addressed in line with the conditions of the outline planning permission and we are unaware of any steps that have been taken to address the remediation of this site. Regardless, the HLSS identifies that this site would deliver 22 dwellings between 2018/2019, which it hasn't do, with the remaining 378 dwellings to be delivered from year 2020/2021 up to 2025/2026. Given the above context, this is considered unrealistic.
- 1.13. Whilst the full list of commitments has not been scrutinised in detail, questions must be raised as to whether the delivery of committed dwellings within the HLSS are realistic.

Saved Local Plan Allocations

- 1.14. Furthermore, the Council appears to continue to rely upon the delivery of saved Local Plan allocations from the North Wiltshire and West Wiltshire Local Plan despite their being a clear record of non-implementation on a number of these sites as set out at Appendix 2 of this Statement.
- 1.15. Given at least 3 of these sites have been allocated for in excess of 10 years without being brought forward, it is considered that they are highly unlikely to provide a reliable source of supply in the future. Indeed, the Council identifies at Appendix 3 of the HLSSS that Land off Oldfield Road is certainly not deliverable in the next 5 years. This site, amongst others shown at Appendix 2, should not be identified as deliverable over the plan period.

Allocations in the WCS

- 1.16. We are also concerned regarding the rate of delivery of allocated sites in the WCS.
- 1.17. For example, the draft WHSAP confirms that the only WCS strategic allocation within Trowbridge, Ashton Park, is failing to deliver the quantum of development initially indicated within the WCS. Ashton Park was previously anticipated to deliver 2,600 dwellings by 2026; however, this has fallen to 1,600 within the plan period and now to 1,350⁶.

³ HLSS March 2018

⁴ See Topic Paper 3 - July 2018

⁵ Application reference: 16/03515/OUT

⁶ PC26

- 1.18. The Council does not appear to have provided any evidence to demonstrate that 1,350 dwellings can be completed over the plan period. Given that outline planning permission has yet to be granted as a legal agreement remains to be negotiated, reserved matters will also need to be approved and conditions will need to be discharged it is highly unlikely that development will commence at this site until at least 2021 leaving some 5 years to deliver the anticipated 1,350 dwellings. This equates to around 270 dwellings per year being delivered at the site over the remaining plan period which is unachievable. It is also understood that the majority of housing at Ashton Park is also reliant on the provision of a new bypass and the delivery of such a key piece of infrastructure will have significant implications for the timely delivery of dwellings which must also be accounted for.
- 1.19. It is worth highlighting that a report by Savills in 2015⁷ analysed the progress of 84 urban extensions. On average it identified that such sites delivered on average 65 units in the first year of construction and after the first year of completions, an average of 110 units remaining at or above that level until year six of delivery. Similarly, a more recent report by Nathaniel Lichfield and Partners identifies⁸ that the average annual build-out rate of greenfield sites between 1,000-1,499 homes is 122 dwellings.
- 1.20. Based on the above, it is considered that the assumption that 1,350 dwellings can be completed at Ashton Park in Trowbridge over the plan period is unrealistic and unjustified.

Proposed Allocations in the WHSAP

- 1.21. We also have a number of concerns regarding some of the proposed site allocations within the draft WHSAP.
- 1.22. The proposed changes show that four sites in Trowbridge (Elm Grove Farm, Upper Studley, Land off Whitehorse Business Park and Elizabeth Way) are now expected to deliver a greater number of dwellings over the plan period, without any justification. There are also several unresolved objections from statutory consultees in respect of the proposed site allocations. Further detail on this is set out at Appendix 3 of this Statement.

Windfalls

- 1.23. We note that the figure for windfalls for the remaining plan period 2017-2026 has now increased from 2,086 to 2,209 for NWWHMA as shown at table 5.1 of Topic Paper 3. However, we are concerned that this approach is not in line with the adopted approach to windfalls in the WCS which was found sound, albeit conservative, by the Inspector⁹. The Council is now using an approach which generates a higher figure and relies on a greater number of large windfall sites than was found sound by the WCS Inspector.

⁷ Urban Extensions – Assessment of Delivery Rates, October 2014

⁸ Start to Finish How Quickly do Large-Scale Housing Sites Deliver? November 2016

⁹ Paragraph 48 of the NPPF 2012 states that local planning authorities can make an allowance for windfall sites as part of anticipated supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends, and should not include residential gardens.

1.24. For the WCS the Council used 'Method 1' as set out in the July 2014 HLSS where the windfall allowance was 583 dwellings for 5 years for the NWWHMA. However, the Council's HLSS¹⁰ shows that the Council is proposing a different method which results in a higher number of 980 dwellings over 5 years in the NWWHMA – representing a significant increase (around 68%) on the reliance for windfalls over the remaining plan period.

1.25. In addition, the Council is also allocating sites therefore the capacity for windfalls should be reduced as these sites will come forward as allocations. Furthermore, at para 5.7 of Topic Paper 3 (HLS addendum) the Council acknowledges that *"in line with the Plan objective to provide surety of supply through allocations, the use of a windfall allowance should not be relied upon."*

1.26. It is therefore considered that there is an over reliance on windfalls.

Overall conclusion on deliverability

1.27. It has been demonstrated that the deliverability of several of the identified sites is questionable and unlikely to deliver against the WCS housing requirement. As such, there is a clear need to identify additional housing sites that can deliver housing over the remainder of the plan period.

1.28. Smaller sites, such as that at Ridgeway Farm in Crudwell, have less issues and can be delivered quickly.

1.29. Therefore, it is strongly considered that the allocation of a greater number of smaller sites across the NWWHMA will mean that the Council is less reliant on any one allocation and more able to meet its delivery targets.

¹⁰ HLSS March 2018

Q2.4 In light of the above, does the WHSAP make adequate overall provision to ensure the delivery of the minimum housing requirement as set out in the WCS?

- 1.30. The adopted WCS requires the delivery of 24,740 dwellings within the NWWHMA over the plan period to 2026. This is acknowledged as a minimum housing requirement, in order to provide a flexible and positive basis to meeting the housing needs of the area.
- 1.31. Topic Paper 3 identifies that one of the 3 objectives of the plan is to *“demonstrate that a continuous five year supply of deliverable land for housing can be met for the duration of the Plan.”* Objective 2 of the WHSAP is to *‘help demonstrate a rolling five year supply of deliverable land for housing development.’*
- 1.32. However, Topic Paper 3 also identifies that in the NWWHMA the LPA will be unable to demonstrate a 5-year housing land supply in years 2024/2025 and 2025/2026, contrary to para 47 of the NPPF¹¹.
- 1.33. Paragraph 3.15 of Topic Paper 3 also appears to acknowledge this stating in respect of the NWWHMA *“... it would appear the pre-submission Plan’s indication that additional allocations may be needed remains appropriate.”*
- 1.34. As such, it is considered that the draft WHSAP does not accord with the NPPF or even its own Objective 2 in this regard.
- 1.35. It is clear from the above that the Council seeks to rely on the delivery of dwellings on several sites that are not realistically capable of coming forward over the plan period, or where the numbers of dwellings to be delivered over the plan period is overly-optimistic. Furthermore, the Council seeks to rely on a method of calculating windfalls that is not justified and realistic as set out in response to Q2.3 and 2.5.
- 1.36. On a final note, the council’s calculation of HLS differs between the methodology advocated in the 2012 NPPF and that used in the 2018 NPPF. Whilst it is acknowledged that for the purposes of plan-making the 2012 NPPF applies, it is still pertinent to bear in mind that this will render housing land supply calculations out of date once the Plan is adopted.
- 1.37. It is our opinion that additional housing sites need to be allocated in the Plan to ensure that the Plan makes suitable and flexible provision to ensure the delivery of the WCS housing requirement.

¹¹ Para 47 of the NPPF requires LPAs to identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements. It also states that LPAs should identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.

ISSUE 3: DOES THE DISTRIBUTION OF SITE ALLOCATIONS ACCORD WITH THE SPATIAL STRATEGY SET OUT IN THE WCS?

3.1 Is the overall distribution of housing allocations consistent with the spatial strategy set out in the WCS?

3.2 Is the distribution within each HMA consistent with the WCS?

1.38. We are concerned that the sites proposed for allocation in the WHSAP demonstrate a strong reliance on large scale residential development, which is to be provided almost exclusively at the Principal Settlements. In the NWWHMA 75% of proposed allocations are proposed at Principal Settlements, 14% at Market Towns and just 11% at Large Villages. We are concerned that the lack of allocations at the Local Service Centres and Large Villages will mean that the housing needs of Wiltshire's smaller communities will remain unmet and the vitality of these communities will not be supported in line with the objectives of the WCS¹².

1.39. The table below confirms the breakdown of new proposed site allocations in the NWWHMA:

Area	Reference	Site Name	No. of dwellings
Principal Settlements			
Trowbridge	H2.1	Elm Grove Farm, Trowbridge	250
Trowbridge	H2.2	Land off the A363 at White Horse Business Park, Trowbridge	175
Trowbridge	H2.3	Elizabeth Way, Trowbridge	355
Trowbridge	H2.4	Church Lane, Trowbridge	45
Trowbridge	H2.5	Upper Studley, Trowbridge	45
Trowbridge	H2.6	Southwick Court, Trowbridge	180
			Total: 1050
Market Towns			
Warminster	H2.7	East of the Dene, Warminster	100
Warminster	H2.8	Bore Hill Farm, Warminster	70
Warminster	H2.9	Boreham Road, Warminster	30
			Total: 200

¹²The spatial strategy as set out in the WCS identifies that development in Large Villages is limited to meet local needs and to help retain the vitality of these communities including improvement of employment opportunities, services and facilities.

Large Villages			
Yatton Keynell	H2.12	East of Farrells Field, Yatton Keynell	30
Bratton	H2.13	Off B3089 adj. to court Orchard/Cassways, Bratton	35
Chapmanslade	H2.10	Barthers Farm Nurseries, Chapmanslade	35
Chippenham	H2.11	The Street, Hullavington	50
			Total: 150

- 1.40. Development in Crudwell (Large Village) has now been removed from the plan despite the fact that the Council has previously acknowledged that there is an identified need for affordable houses in Crudwell. The SA which supports the draft WHSAP identified in respect of the site at Ridgeway Farm, Crudwell that additional housing in Crudwell “ *would address an identified need for housing in the local area....* ”
- 1.41. A recent Crudwell Parish Housing Needs Assessment (CPHNA) has been undertaken to support the emerging Crudwell Neighbourhood Plan (CNP) which suggests that the village requires around 20-25 additional homes (market and affordable) up to 2026. Edenstone Homes also commissioned Pioneer Housing to review the CPHNA and the conclusions of that report identify that the Assessment undertaken bears no resemblance to national guidance recommendations for the assessment of overall housing need using formal household projections as a starting point. The report from Pioneer is attached at Appendix 1. Pioneer’s analysis for 2019 to 2026, in conjunction with unmet need for 2006 to 2018 based on CPHNA past housing need analysis, suggests that a minimum additional provision of c.60 homes in the Parish to 2026 would be closer to the kind of levels required based on additional DCLG 2014-based household projection.
- 1.42. We are therefore concerned that the removal of Ridgeway Farm in Crudwell means that local people will be forced to move elsewhere as well as rising unaffordable house prices. The WHSAP clearly conflicts with the spatial strategy of the WCS in this regard as the WCS seeks to enable development at Large Villages to meet local needs and the removal of this site clearly prevents development coming forward in an area where there is an identified need for affordable housing.
- 1.43. Furthermore, restricting further development in Large Villages such as Crudwell will inhibit the ability to enhance the vitality of these Villages and enable new services and facilities to be provided. Indeed, in Crudwell there is an acknowledged need for the primary school to expand and the MCA Topic Paper identifies at Page 89 in respect of the site at Ridgeway Farm that “ *the ability for this development to deliver the requirement of dwellings to support the extension of the school is a benefit to the community.* ”
- 1.44. Whilst it is also advanced by the Council that the indicative housing needs have been met in the MCA and remainder, paragraph 4.35 of the draft WHSAP acknowledges that “ *It would not, however, be reasonable to expect the distribution and scale of land supply to adhere rigidly to the levels set*

out in the WCS. It would be unrealistic to expect as much. The WCS explains that levels are indicative and that there needs to be some flexibility.”

- 1.45. Overall, the proposed reliance on larger sites at principal settlements has been shown to be flawed. We consider that this imbalance needs to be addressed by allocating a greater proportion of dwellings at smaller sites within rural Service Centres and Large Villages in order to provide surety that the Council’s delivery targets over the remaining plan period can be met successfully. This will enable the housing needs of smaller communities to be met and will also help to support the vitality of these communities in line with the NPPF and the objectives of the WCS spatial strategy.

3.3 Is the approach set out at 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?

- 1.46. The approach taken to identifying 'areas of search' to meet the remaining housing requirement is not considered to be justified. Firstly, the process has sought to only review sites at settlements where it is considered that the 'indicative' requirement for housing within the CS has not been met. However, it is considered that the selection process should instead consider the sites for development which fit with the spatial strategy to direct development to the most sustainable settlements.
- 1.47. We note that the Council's Topic Paper 3, HLS addendum (July 2018) identifies that in the NWWHMA the LPA will be unable to demonstrate a 5 year housing land supply in years 2024/2025 and 2025/2026. However, the NPPF requires LPAs to identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15. Therefore, the approach to site selection in this regard is flawed.
- 1.48. The WCS Inspector identifies that the HMAs should provide the basis of supply rather than the smaller community areas¹³. Para 4.20 of the WCS also acknowledges this point as well as paragraph 4.35 of the draft WHSAP.
- 1.49. Therefore, the Council's approach to discounting sites which could be more suitable and sustainable, is in direct conflict with the WCS Inspector's considerations; this approach also conflicts with the Council's own statements within the WCS and draft WHSAP. The site selection methodology is therefore unsound in this respect.
- 1.50. Paragraph 4.16 of Topic Paper 2¹⁴ also explains that SHLAA sites at some large villages were removed from further consideration as for some large villages growth has already been considered by Neighbourhood Plans, where these plans have advanced to a sufficient stage. Footnote 15 defines plans that have reached a sufficiently advanced stage to be those where *"A Neighbourhood Plan has been publicised by the Council under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012."*
- 1.51. Therefore, the removal of the site allocation at Ridgeway Farm, Crudwell on the basis that the CNP is making 'good progress' is considered unjustified. ¹⁵ The CNP Area was designated on 20th March 2015 and a draft Neighbourhood Plan is still yet to be submitted to the Local Planning Authority some 4 years later. The initial regulation 14 consultation ended on 1st February 2019, highlighting some progress; however, the NP has not got to Regulation 16 and therefore the approach to discounting the allocation at Ridgeway Farm is contrary to the site selection process methodology.

¹³ See para 43 of the Inspector's report into the WCS

¹⁴ Topic Paper 2: Site Selection Process Methodology

¹⁵ Proposed modifications PC92

- 1.52. Therefore, it is our opinion that a consistent approach has not been taken to site selection with respect of the status of Neighbourhood Plans.
- 1.53. It is also important to note that whilst regulation 14 consultation has been undertaken, Edenstone Homes submitted representations which raised a number of concerns regarding the draft plan¹⁶.
- 1.54. Therefore, the originally proposed housing allocation H2.13 at Ridgeway Farm, Crudwell should be reinstated into the plan to meet identified needs and ensure the Council can maintain a rolling 5 year housing land supply.

Q3.4 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?

- 1.55. In response to Q2.1 the HMA's are the appropriate basis to consider the provision of housing against the requirements of the WCS.
- 1.56. In response to questions 2.3 and 2.5 there are several questions surrounding the deliverability of a number of sites in the NWWHMA over the remaining plan period.
- 1.57. Therefore, additional housing sites need to be allocated in the Plan¹⁷ to ensure that the Plan makes suitable provision to ensure the delivery of the WCS housing requirement and maintains a rolling 5-year housing land supply.

¹⁶ A copy of these representations can be provided to the Inspector if required.

¹⁷ Within the NWWHMA

Housing Requirements Evidence Review

In respect of:

Crudwell Parish Housing Needs Assessment, March 2018

Prepared by:

Pioneer Property Services Ltd

On behalf of:

Edenstone Homes

Date:

29th January 2019



Contents:

Page:

EXECUTIVE SUMMARY	2
1 INTRODUCTION	4
2 BACKGROUND CONTEXT.....	4
3 THE CRUDWELL PARISH HOUSING NEEDS ASSESSMENT.....	5
3.1 DCLG HOUSEHOLD PROJECTIONS	5
3.2 PAST DWELLING COMPLETION RATES	11
3.3 WILTSHIRE CORE STRATEGY (2006 – 2026)	12
3.4 JOINT SWINDON AND WILTSHIRE STRATEGIC HOUSING MARKET ASSESSMENT 2017	14
3.5 PARISH HOUSING NEEDS SURVEY 2015 AND WILTSHIRE COUNCIL HOUSING REGISTER	16
3.6 BRINGING THE EVIDENCE TOGETHER	17
4 CONCLUSION.....	21
5 APPENDIX 1	24

EXECUTIVE SUMMARY

- i. Pioneer Property Services Ltd has undertaken a review of the Crudwell Parish Housing Needs Assessment (“CPHNA”) on behalf of Edenstone Homes.**
- ii. The CPHNA suggestion that between 20 and 25 additional homes (market and affordable) within the Parish would be appropriate to 2026 (based on replicating past supply rates and evidentially questionable conclusions on current and future net levels of affordable housing need) is unreliable.**
- iii. The CPHNA conclusion is based on an approach that bears no resemblance to national guidance recommendations for the assessment of overall housing need using formal household projections as a starting point. Furthermore, the CPHNA does so without setting out any exceptional circumstances for this departure.**
- iv. Whilst not intended as a replacement Housing Needs Assessment, Pioneer analysis for 2019 to 2026 in conjunction with unmet need for 2006 to 2018 based on CPHNA past housing need analysis suggests that a minimum additional provision of c.60 homes in the Parish to 2026 (i.e. 52 unmet past need plus 31 projected need net of a 23 dwelling past / planned supply) would be closer to the kind of levels suggested to be necessary based on additional DCLG 2014-based household projection (Government has expressed a clear preference in a recent Consultation for the use of DCLG 2014-based projections rather than the ONS 2016-based projections). This is closer to the CPHNA’s own DCLG 2014-based projection of 58 residual dwelling requirement to 2026.**
- v. A significant proportion of the implied net 60 home requirement (c.67%) is attributable to unmet past housing need suggesting additional housing is needed in the short term as opposed to the latter end of the assessed 7 year period.**
- vi. Based on past supply levels (suggested in Table 3 of the CPHNA to equate to 1.3 per annum 2001 to 2016) it would take c.46 years to deliver the 60 homes (minimum) suggested to be needed by 2026.**
- vii. This analysis (to enable comparison to the CPHNA) only extends over the next 7 years to 2026 and arguably the Neighbourhood Plan should also be thinking about a longer Plan period, particularly given recent efforts to prepare the JSF to 2036.**

- viii. Looking ahead to 2036 Pioneer projections suggest a requirement for an additional 59 dwellings in the Parish – added to the unmet need for 40 dwellings suggested by the CPHNA household projection based analysis (i.e. a need for 52 dwellings minus 12 completions) and net of a further 11 dwelling supply suggested by the CPHNA this suggests a minimum of c.88 dwellings are needed 2019 to 2036. Unless planned dwelling supply is increased above past levels of delivery the suggested residual unmet housing requirement in the Parish is likely to keep increasing.
- ix. The ‘approximate’ planned level of housing supply within the CS for the MCA outside of Malmesbury town is based on a 7 year old SHMA which precedes the current framework and was published during a period of ongoing economic constraint.
- x. Constraints to household formation (such as an under provision of new homes) will worsen the ability of rural Parishes such as Crudwell to retain / attract working age and family households to contribute towards a healthy local economy and a balanced community. Tackling this may necessitate uplifts in housing provision over and above baseline levels of provision.
- xi. The lack of a ceiling limit in the CS on planned supply for the MCA outside of Malmesbury town, the direction by the CS of development away from Small Villages and undefined settlements, and the age of the evidence base underpinning the CS housing policies all place an increased emphasis on the delivery of homes in Large Villages such as Crudwell to meet not only Parish needs but also the housing needs within those other areas.
- xii. If an appropriate level of provision is to be planned for within the Neighbourhood Plan for all facets of the local community further work is clearly needed on the assessment of housing requirements within the Parish (including in respect of affordable housing). Planning for 20 to 25 homes to 2026 will fail to reflect the projected level of housing need or address the suggested past under supply.

1 Introduction

- 1.1 Pioneer Property Services Ltd have been asked to undertake a review of the Crudwell Parish Housing Needs Assessment (“CPHNA”) on behalf of Edenstone Homes with a view to understanding the evidence base informing the approach to meeting housing and affordable housing needs within the Parish.

2 Background Context

- 2.1 Crudwell Parish lies in north Wiltshire and within the Malmesbury Community Area (“MCA”) as designated within the Wiltshire Core Strategy (“CS” - adopted in January 2015) Core Policy 13.
- 2.2 Crudwell itself is designated as a ‘large village’ and across the wider MCA outside of the market town of Malmesbury the CS Core Policy 13 plans for ‘approximately 510 homes’ in the 2006 to 2026 period.
- 2.3 The examining Inspector’s report on the CS in December 2014 highlighted the Council’s commitment to:

“...undertaking a planned early review of the CS to ensure “the development provision looks to an appropriately long term end date” which will be supported by an updated Strategic Housing Market Assessment (SHMA).”

(paragraph 20, CS Inspector’s Report, December 2014)

- 2.4 The CS is based on a 2011 SHMA and the Council remains in the process of preparing a ‘Wiltshire Housing Site Allocations Plan’ and a Chippenham Site Allocations Plan was adopted in May 2017, although these are not understood to have reviewed the planned level of housing delivery in Wiltshire.
- 2.5 Swindon and Wiltshire have been in the process of preparing a Joint Spatial Framework (“JSF”) to take forward the approach for jobs, homes and infrastructure for the 2016 to 2036 period. As part of this process an updated Swindon and Wiltshire SHMA (“SWSHMA” - March 2017) has been prepared. This assessment appears to place Crudwell within the Swindon Housing Market Area (Figure 1, page 8) although no clear break down by Parish appears to be provided.

- 2.6 The local authorities are now preparing a Statement of Common Ground and it is yet to be confirmed whether or not the JSF will proceed.
- 2.7 This is the wider context in which any assessment of housing need for Parishes such as Crudwell should be understood: the 'approximate' planned level of housing supply for the non-Malmesbury section of the MCA and for Wiltshire as a whole is based on a 7 year old SHMA which precedes the current framework, was published during a period of ongoing economic constraint and does not represent a ceiling on proposed development.
- 2.8 Despite a promised early review of the CS being a factor taken into account by the CS examining Inspector when determining the soundness of the CS the process of establishing a new planned level of housing delivery for Wiltshire based on up to date evidence is yet to take place. This has a direct impact on the level of housing supply planned for Community Areas / HMAs within Wiltshire.
- 2.9 Additionally, the 2018 National Planning Policy Framework ("NPPF") has introduced the requirement for Local Plans (where these are not subject to transitional arrangements) to apply the Standard Methodology for the calculation of housing need unless 'exceptional circumstances' apply to justify an alternative approach. Any new Local Plan for Wiltshire will fall within the scope of this.

3 The Crudwell Parish Housing Needs Assessment

- 3.1 The CPHNA was prepared by Vision Planning on behalf of the Crudwell Neighbourhood Steering Group 'to inform the number of dwellings for which the Neighbourhood Plan should provide'. The CPHNA was published in March 2018 ahead of the July 2018 NPPF.

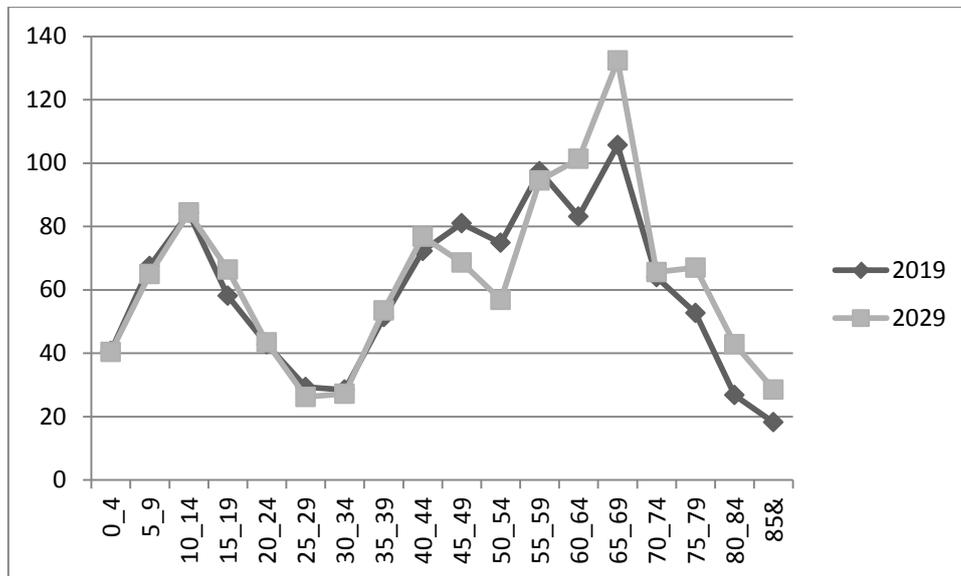
3.1 DCLG Household Projections

- 3.1.1 Starting with 2011 Census household estimates for the local authority and the Parish the CPHNA undertakes a process by which it uses 2014 based household projection outputs at a local authority level to inform proportionate uplifts to the Crudwell Parish household numbers. On this basis it suggests an additional 81 dwellings are likely to be required for the 2006 to 2026 period (i.e. 4 per annum).
- 3.1.2 However, whilst this provides a crude starting point for understanding the likely housing need within Crudwell Parish there are a number of points that it does not explore:

- **Whether a policy-on approach of attracting additional working age households to the Parish would be beneficial to the sustainability of the community as a whole.**

Based on modelling using Output Areas that align with the extent of Crudwell Parish,¹ small area Mid-2017 Population Estimates² data as a starting point for 2017 and assuming projected population increases / decreases³ across the age groups at a local authority apply to age cohorts within the Parish in the same proportions as across Wiltshire, suggests the following projected change in population by age between 2019 and 2029:

Figure 3.1.1 – Projected Change in Household Population by Age, Crudwell Parish 2019 to 2029



Source: Pioneer modelling based on Mid-2017 Population Estimates Table SAPE20DT10g and DCLG 2014-based Household Projections detailed data for modelling and analysis

This suggests that, alongside a continuing trend of a low proportion of 20 to 34 year olds, the population in the Parish will become even more aged by 2029 with a reduction in 45 – 54 year olds and increases in the 60 to 69 and 75+ age groups.

Whilst this pattern of an aging population is broadly proportionately replicated across much of Wiltshire it suggests that constraints to household formation (such as an under

¹ E00162639, E00162640, E00162641 – see Appendix 1
² Table SAPE20DT10g: Mid-2017 Population Estimates for Census Output Areas in the South West region of England by Single Year of Age and Sex
³ based on the DCLG 2014-based Household Projections detailed data for modelling and analysis – this is used in preference to the 2016 based projections in line with the Government Technical Consultation on updates to national planning policy and guidance, October 2018

provision of new homes) will worsen the ability of rural Parishes such as Crudwell to retain working age / family households to contribute towards a healthy local economy and a balanced community. New homes for both family households and for older households to downsize into would be beneficial.

- **Whether the broad process applied by the CPHNA to approximate household projections for Crudwell Parish is fine grained enough to provide a reasonable projection of housing need in the Parish**

Pioneer has undertaken additional modelling which uses small area Mid-2017 Population Estimates for the Parish across all ages and by gender in conjunction with population projections by age group / gender and household representative rates at a local authority level (based on DCLG 2014-based Household Projections detailed data for modelling and analysis)⁴ to provide a projection of households at a Parish level.

This suggests c.41 additional households over a 2019 to 2029 ten year period which, when a 3.7% vacancy rate is taken into consideration for this Parish,⁵ suggests a need for c.42 dwellings over this period (4.2 per annum). This approach enables a finer grained assessment based on the distribution of the population by age within Crudwell Parish albeit assuming that projected population increases by age cohort and household representative rates by age cohort align with those at a local authority level.

⁴The Standard methodology uses Household Projections as the starting point and, in line with the Government Technical Consultation on updates to national planning policy and guidance (October 2018), the DCLG 2014-based Household Projections remain the Government's preferred starting point despite the publication of the ONS 2016-based household projections.

⁵based on ONS table QS417EW

Figure 3.1.2 – Modelled Parish Level Household Projection

Crudwell Parish

	Population				Households			
	2019	2029	Growth		2019	2029	Growth	
PROJ1(2014 SNPP CLG baseline)	1078	1141	62	5.8%	488	529	41	8.3%
	2019	2026	Growth		2019	2026	Growth	
	1078	1126	48	4.5%	488	518	30	6.0%
	2019	2036	Growth		2019	2036	Growth	
	1078	1157	79	7.3%	488	546	57	11.7%

42	2019 - 2029 Projected Additional Dwellings Required (3.7% vacancy rate)
31	2019 - 2026 Projected Additional Dwellings Required (3.7% vacancy rate)
59	2019 - 2036 Projected Additional Dwellings Required (3.7% vacancy rate)

Source: Pioneer modelling - Mid-2017 Population Estimates for the Census Output Areas by age / gender within the Parish and local authority population projections by age group / gender and household representative rates based on DCLG 2014-based Household Projections detailed data for modelling and analysis

Pioneer has modelled the 2019 to 2029 period as this aligns with the Standard Methodology approach of applying a 10 year period starting at the current year. The relevant affordability adjustment (if applicable) would normally then be applied in line with the Standard Methodology (see below).

However, to enable comparison to the CPHNA outputs a further 2019 to 2026 period has been modelled; albeit due to the methodology it remains forward looking (i.e. it does not cover the 2006 to 2018 period). This suggests a projected increase of 4.3 households per year or a need for 4.4 dwellings per annum 2019 to 2026 (7 years).

A further period to 2036 has also been modelled and suggests a projected increase of 59 households over this 17 year period.

- **Whether any adjustments to reflect affordability pressures are appropriate or not.**

It is generally accepted when undertaking overarching Objective Housing Need Assessments at a local authority or Housing Market Area level that an adjustment for market signals (i.e. such as affordability) may be needed. This is something which has been carried forwards within the Standard Methodology referred to in the NPPF which uses Median Workplace Based Affordability Ratio data published by the ONS (the latest running up to 2017). No adjustment is applied where the ratio is 4 or below.

In Wiltshire as at 2017 the ratio is 9.43⁶ and, therefore, an adjustment applied in line with the Standard Methodology formula is appropriate. This is based on a median house price of £257,000⁷ as at the year ending September 2017. It is relevant to note that median house prices in Crudwell Parish have been higher than the median across Wiltshire for this period. Analysis of Land Registry sold house price data suggests a median house price of £355,000 in the Crudwell locality, with just 10 sales between Sept 2016 and Sept 2017, compared to £258k across Wiltshire (or £255k if Swindon is excluded). Against the 2017 median Wiltshire gross annual workplace-based earnings of £27,244⁸ this suggests an affordability ratio of 13 for the Crudwell locality.

If the Wiltshire affordability ratio is applied to the Crudwell Parish household projection suggested by the modelling undertaken by Pioneer (at 4.3 per annum for the 2019 to 2026 period) this increases the household projection to 5.7 per annum. If a 3.7% vacancy rate is then applied to convert households into dwellings this increases to 6 dwellings per annum, or 42 dwellings over 7 years 2019 to 2026 (see Figure 3.1.3 below).

This may still be insufficient in terms of fully addressing the affordable housing need in the Parish over the period and if the affordability ratio of 13 (suggested to be more typical for Crudwell when median house prices are compared to Wiltshire workplace-based median earnings) the household projection increases to 6.7 suggesting a need for c.7 dwellings per annum or 49 over 7 years (albeit a 40% cap on the increase would see this restricted to 6 per annum):

⁶ Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2017, Table 5c

⁷ Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2017, Table 5a

⁸ Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2017, Table 5b

Figure 3.1.3

Crudwell Parish - Standard Method Housing Need Calculation based on DCLG 2014-based household projection						
Additional Households 2019 to 2026*	Additional Households Per Year	2017 median workplace based affordability ratio	Adjustment Factor	Adjusted household growth	40% Cap on Projection	Adjustment for Vacancy Rate (3.7%⁹)
30	4.3	9.43 (Wiltshire ¹⁰)	0.3394	5.7	6.0	6.0
30	4.3	13.00 (Crudwell) ¹¹	0.5625	6.7	6.0	6.9

*Pioneer Modelling – see Figure 3.1.2

- 3.1.3 The Pioneer modelling relates to the level of housing need going forwards to 2026, but, as the CPHNA approach suggests, there is likely to have been an under supply of homes to meet housing need arising in the years since the beginning of the CS (2006).
- 3.1.4 Based on the CPHNA DCLG Projection assessment of housing need at a Parish level (and without applying any affordability uplift) for the 13 years 2006 to 2018 (inclusive) c.4 dwellings should have been provided per annum (52 dwellings).
- 3.1.5 Additional Pioneer analysis undertaken for the 2019 to 2026 period (without an uplift to reflect affordability in line with national guidance where past under delivery is taken into consideration¹²), suggests a further 4.4 dwellings per annum (i.e. 31 over 7 years). Added to a 52 dwelling requirement for 2006 to 2018 this suggests a need for c.83 dwellings for the whole 20 year period.
- 3.1.6 The CPHNA suggests that based on Wiltshire Council's own evidence supporting the emerging Wiltshire Housing Site Allocations DPD just 12 completions took place in the Parish 2006 to 2016 and only 11 developable commitments are identified for the 2016 to 2026 period (10 of which are likely to relate to a site that is understood to now have been completed – 'Athelstan Park'). There is no assessment of likely provision beyond that date. Deducting this supply would leave a net shortfall of 60 dwellings against the need for new homes up to 2026.

⁹ based on ONS table QS417EW

¹⁰ Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2017, Table 5c

¹¹ Land Registry Sold House Price Data for Crudwell locality compared to Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2017, Table 5b

¹² NPPG. Paragraph: 017 Reference ID: 2a-017-20180913

- 3.1.7 This under supply is not fully reflected purely through the application of an NPPG affordability adjustment to the Pioneer 2019 to 2026 projection (net of planned supply), and, in areas such as Crudwell (subject to much higher median house prices than the local authority as a whole), it is entirely reasonable to fully reflect the level of undersupply when seeking to understand how the community should be planning to meet housing need. Indeed, the NPPG confirms that alternative approaches to using the affordability adjustment should take undersupply into account.
- 3.1.8 The finer grained Pioneer modelling taking under supply into account suggests a residual need for homes in the Parish to 2026 that is very similar to the 58 dwellings suggested by the CPHNA DCLG household projection based modelling (58). However, this only extends over the next 7 years and arguably the Neighbourhood Plan should also be thinking about a longer Plan period.
- 3.1.9 Looking ahead to 2036 Pioneer projections suggest a requirement for an additional 59 dwellings (see Figure 3.1.2) – added to the unmet need for 40 dwellings suggested by the CPHNA (i.e. 52 minus 12 completions) and net of a further 11 dwelling supply suggested by the CPHNA this suggests c.88 dwellings are needed 2019 to 2036.¹³ Unless planned supply is increased the suggested residual unmet housing requirement in the Parish is likely to keep increasing.

3.2 Past Dwelling Completion Rates

- 3.2.1 In Section 4 the CPHNA appears to reach alternative conclusions on the likely residual need for additional dwellings within the Parish based on past completion rates.
- 3.2.2 In so doing it quotes from a document entitled 'Housing Needs Assessments at Neighbourhood Plan Level – A Toolkit for Neighbourhood Planners' ("Toolkit") published by a charitable company called 'Locality' (i.e. it is not Government guidance and has no status as such - the Locality website terms and conditions confirm that published material is for general information and use only and to visit Gov.uk for formal guidance¹⁴).
- 3.2.3 The CPHNA appears to interpret the paragraph it quotes – which essentially suggests looking at past completion rates may be useful when trying to understand the implications of

¹³ i.e. 40 plus 59 = 99 minus 11 = 88

¹⁴ <https://neighbourhoodplanning.org/terms-and-conditions/>

projections of housing need – as recommending a continuation of past delivery trends when planning future levels of new homes.

- 3.2.4 The Toolkit paragraph is footnoted with a reference to 'NPPG Paragraph: 019 Reference ID: 2a-019-201Lt0306' which has been superseded by updated guidance. It is relevant to note that the NPPG paragraph referenced confirms that where historic housing supply rates have fallen below planned supply then future supply should be increased.
- 3.2.5 In addition to the above concern, the CPHNA makes a number of assumptions about the number of dwellings in the Parish as at 2001, 2006 and 2016, although the actual net position for these years is unknown; the last reliable count is provided within the 2011 Census. The CPHNA then uses the crudely estimated 2006 dwelling figure against a 2026 number of dwellings (derived on the basis that past delivery rates for the periods considered would continue) to suggest a 2006 to 2026 housing requirement.
- 3.2.6 Neither Government guidance nor the informal Toolkit suggest that future planned supply should be restricted to past delivery rates, or that these should be used as some sort of proxy assessment of an areas housing requirement. The CPHNA conclusion in section 4 (and based on this flawed reasoning) that there is a residual requirement for between 4 and 25 dwellings in the Parish between 2006 and 2026 is therefore unreliable.
- 3.2.7 If anything, the CPHNA analysis serves to highlight the significant under provision of new homes in the Parish since 2006 (and likely before) compared to the CPHNA projection based assessment of housing need in Section 3 from 2006.

3.3 Wiltshire Core Strategy (2006 – 2026)

- 3.3.1 The CPHNA refers to the housing delivery targets for the MCA set out within the CS (i.e. 885 or 510 outside of Malmesbury town). It then calculates how this would be distributed across the settlements / Parishes within the MCA if supply is assumed to be proportionate to the number of dwellings in each settlement as a percentage of all dwellings in the MCA as at 2011.
- 3.3.2 On this basis the CPHNA concludes a proportionate supply of between 19 and 27 additional dwellings for Crudwell Parish, which reduces to 0 and 14 respectively once past and committed supply has been deducted.

However, the following points should be taken into consideration:

- CS makes it clear in CS Core Policy 13 that the 510 planned supply for the MCA outside of Malmesbury town is 'approximate' – i.e. it is not a ceiling.
- CS policies do not suggest that planned supply should be distributed in the way calculated by the CPHNA
- CS housing policies rely on a December 2011 SHMA (i.e. over 7 years old and undertaken during the financial crisis era and earlier iterations of the NPPF and NPPG)
- The CS remains to be reviewed to ensure it reflects housing requirements up to an 'appropriately long term end date' supported by 'updated SHMA' evidence as the December 2014 examining Inspector's report suggests had been confirmed by the Council (see section 2 above).
- The adopted Chippenham Site Allocations Plan and the emerging Wiltshire Housing Site Allocations Plan do not review the amount of housing planned for in the CS
- Wiltshire Council began the process of reviewing Plan policy in conjunction with Swindon, although this process may now be replaced by a Statement of Common Ground, meaning that a review of the CS feels more unlikely
- The CPHNA approach does not reflect that Core Policy 1 directs development to Large Settlements (of which Crudwell is one) ahead of Small Villages or other undefined settlements – CS supporting text clarifies that:

"...there is a general presumption against development outside the defined limits of development of the Principal Settlements, Market Towns, Local Service Centres and Large Villages"

(paragraph 4.16, CS)

Therefore, if a proportionate distribution of the 510 planned 'approximate' supply is to be applied to Crudwell this should reflect its scale in the context of the other Large Villages in the MCA outside of Malmesbury town. Core Policy 13 lists Ashton Keynes, Crudwell, Great Somerford, Oaksey and Sherston as Large Villages in the MCA.

Based on CPHNA Table 4 these Large Villages comprised of 2,291 dwellings as at 2011, of which 431 (18.81%) were in Crudwell. If 18.81% is applied to the 'approximate' planned supply of 510 homes outside of Malmesbury town this suggests a proportionate

planned supply of c.96 homes 2006 to 2026 (c.5 per annum) to apply to Crudwell (NB: after homes already delivered / committed are deducted a shortfall of c.73 homes would remain to 2026).

3.3.3 Taking these points into consideration, and particularly given the lack of a ceiling limit in the CS on planned supply for the MCA outside of Malmesbury town and the direction of development away from Small Villages and undefined settlements, the conclusions in paragraph 5.7 of the CPHNA on net additional dwellings to be provided in Crudwell Parish in the context of the CS are of limited use.

3.4 Joint Swindon and Wiltshire Strategic Housing Market Assessment 2017

3.4.1 The CPHNA considers the outputs of the 2017 SWSHMA and how these may relate to Crudwell Parish.

3.4.2 As part of this process, in Table 5 the CPHNA takes the increase in households projected in its Table 1 between 2016 and 2036 (i.e. 65) and, on the basis that this equates to 0.25% of the SWSHMA Swindon HMA 26,247 baseline household projection, assumes that all other adjustments to the baseline household projection in Crudwell Parish occur at a rate of 0.25% of the adjustments applied in the SWSHMA.

3.4.3 Notwithstanding the potential issues around the CPHNA projection in CPHNA Table 1 (as set out in Section 3.1 above) there are clearly issues with assuming that all subsequent adjustments to the baseline household projection will arise in the same proportion as the Crudwell baseline household projection as a proportion of the wider Swindon HMA baseline household projection.

3.4.4 Of particular concern is the application of assumptions about the past under delivery of homes at a Parish level – this is included as amounting to 3 dwellings. The CPHNA approach fails to reflect the level of under delivery compared to its own assessment of housing need for the 2006 to 2026 period using DCLG household projections within its section 3.

3.4.5 This suggests a requirement for c.4 dwellings per annum on average in the Parish 2006 to 2026, or 44 over an 11 year period to 2016. Against a past supply of 12 dwellings for the period to 2016 this suggests an under supply of c.32 homes to 2016.

3.4.6 Similarly, if instead of looking at the level of past under supply, the Standard Method affordability adjustment is applied to the baseline household projection starting point suggested in the CPHNA for the Parish for the 2016 to 2036 period (i.e. 65) a greater upward adjustment is suggested than applied in CPHNA Table 5:

Figure 3.4.1

Crudwell Parish - Standard Method Housing Need Calculation based on DCLG 2014-based household projection							
CPHNA Additional Households 2016 to 2036	CPHNA Additional Households Per Year	2017 median workplace based affordability ratio	Adjust-ment Factor	Adjusted household growth	40% Cap on Projection	Adjustm ent for Vacancy Rate (3.7%)¹⁵	Total Dwellings 2016 to 2036
65	3.25	9.43 (Wiltshire ¹⁶)	0.339375	4.4	4.6	4.5	90
65	3.25	13.00 (Crudwell) ¹⁷	0.5625	5.1	4.6	5.3	105

3.4.7 The above suggests an additional uplift of between 22 to 36 dwellings over the baseline CPHNA Table 5 dwelling projection (i.e. 68) as a result of the affordability adjustment (with the lower end being reflective of an adjustment capped at 40% above the baseline household position).

3.4.8 Therefore, taking past undersupply or alternatively an affordability adjustment into account, the baseline household / dwelling projection in Table 5 of the CPHNA should reasonably be uplifted by c.30 dwellings. This suggests an output for the Parish of c.98¹⁸ over a 20 year period to 2036. An uplift of 3 dwellings is clearly insufficient under either the under supply or affordability measure.

3.4.9 As this 98 dwelling output already takes past commitments to 2016 into account only the planned committed supply (likely now completed) of 11 dwellings would remain of relevance resulting in a net additional need for 87 homes in the Parish up to 2036. However, the SWSHMA reliance on 2012-based household projections makes the baseline outputs questionable and the CPHNA approach to calculating a proxy Parish housing need, similar to its DCLG based analysis, is fairly crude.

¹⁵ based on ONS table QS417EW

¹⁶ Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2017, Table 5c

¹⁷ Land Registry Sold House Price Data for Crudwell locality compared to Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2017, Table 5b

¹⁸ 68 dwelling need projection baseline plus 30 as a mid-point of the under-supply/affordability adjustment analysis

3.5 Parish Housing Needs Survey 2015 and Wiltshire Council Housing Register

- 3.5.1 The CPHNA provides a summary of a Wiltshire Council 2015 Parish Housing Needs Survey (“PHNS”) in so far as this provides a view on affordable housing need. The CPHNA notes that the PHNS concludes a need for 8 affordable homes based on a survey circulated in 2014, but negates to reflect that this relates to a 3 year period.
- 3.5.2 In this respect it is relevant to note that the PHNS broadly suggests an average need for 2.7 affordable homes per annum over a 3 year period. On the assumption that this assessed average level of affordable housing need prevails annually in Crudwell it would suggest a need for c.13 affordable homes by 2019 (i.e., over 5 years).
- 3.5.3 The CPHNA suggests that c.5 affordable homes may be proposed in Crudwell Parish (albeit this site – Athelstan Park - is understood to now have completed). This would leave a net unmet need for c.8 affordable homes by 2019. If a rate of need for 2.7 affordable homes per annum were to prevail between 2019 and 2026 a need for a further 19 affordable homes could accrue. Together with a backlog need for 8 affordable homes a total of 27 Affordable homes net of supply would remain to be provided – assuming 40% of all housing completions were affordable an overall housing supply of c.68 homes would be needed by 2026. In reality not all sites may provide 40% affordable housing depending upon site size and viability.
- 3.5.4 The above analysis in paragraph 3.5.3 is purely theoretical, but it demonstrates that the CPHNA suggestion that just 20 homes are needed in the Parish overall to 2026 based on the PHNS is unreliable and should not be used as a basis for planning the future supply of homes (market and affordable) within the Parish.
- 3.5.5 Based on the Housing Register only 1 household is registered as seeking affordable housing within Crudwell. However, the 2015 PHNS would suggest that this is likely to underestimate the likely backlog of need for affordable housing in the Parish.
- 3.5.6 Instead it may be reflective of a household’s perceived chance of obtaining affordable housing in a location such as this; instead households with a pressing need may register an interest in a nearest larger settlement, such as Malmesbury, on the basis they will have more chance of being housed there.
- 3.5.7 Additionally, other households in need may not register at all and the Register does not provide an assessment of annually arising affordable housing need in conjunction with

supply through existing stock re-lets and sales. There are also households that are seeking affordable housing in the MCA outside of Malmesbury town and in Small Villages or undefined settlements which will place additional pressures on affordable housing provision within the Large Villages.

- 3.5.8 Indeed, the PHNS itself may underestimate affordable housing need on the basis that 99.4% of the respondents already live in the Parish (i.e. other existing or emerging households may already have had to leave the Parish to obtain suitable housing and so will not be reflected in the study). It is also unclear that the PHNS provides a full assessment of both current and future net affordable housing needs (i.e. including newly arising need as well as existing backlog need) and the survey itself is now over 4 years old.
- 3.5.9 Affordable housing need will continue to arise in the Parish going forwards beyond 2019 in addition to any unmet backlog of affordable housing need, but the PHNS does not provide an assessment of this and an affordable housing need assessment is not undertaken by the CPHNA. Given the affordability pressures suggested to exist in the Parish (and the extremely limited availability of rented homes on the open market¹⁹) it seems likely that additional affordable housing will continue to be needed – this appears to be acknowledged by the CPHNA in paragraph 10.5.

3.6 Bringing the Evidence Together

- 3.6.1 The final section (10) of the CPHNA draws conclusions and presents a table which summarises the various residual housing requirement outputs suggested in the body of the report. These outputs range from nil to 58.
- 3.6.2 Despite the upper end of this range the CPHNA concludes that it is 'reasonable to assume that Crudwell parish's residual housing requirement up to 2026 is 20 to 25 dwellings'. However, this is based on the outputs from two flawed assessments of how additional housing requirements should be calculated using data from the 2015 Parish Housing Needs Survey and on past dwelling completion rates.

2015 Parish Housing Needs Survey - Affordable Housing Need

- The CPHNA 20 residual overall housing requirement is based on a 2015 Housing Needs Survey on the basis that the CPHNA considers this is how many additional

¹⁹ As at 22/01/2019 Rightmove.co.uk suggests just 1 dwelling for rent within the Parish

dwellings are required overall to address 'a minimum need for eight affordable homes'. However, this 2015 Survey:

- is now over 4 years old
 - suggests an annual need for 2.7 affordable homes over 3 years (NB: if this is assumed to prevail between 2014 and 2026 and net of a supply of 5 affordable homes is deducted this suggests c.27 affordable homes would be needed (i.e. therefore c.68 homes overall if affordable housing is assumed to equate to 40% of overall provision)
 - does not reflect both current and newly arising net affordable housing need during the Plan period or the needs of households who have already had to leave the Parish due to a lack of affordable housing
- Given the affordability pressures suggested to exist in the Parish it seems likely that additional affordable housing will continue to be needed and that sources such as the 2015 Survey and the Housing Register underestimate this – this appears to be acknowledged by the CPHNA in paragraph 10.5.
 - The Pioneer analysis of the 2015 Survey data suggesting a minimum need for 68 market and affordable homes overall (2019 to 2026) based on a 40% affordable housing target is purely theoretical, but it demonstrates that the CPHNA suggestion that just 20 homes are needed in the Parish overall to 2026 is unlikely to be reliable and should not be used as a basis for planning the future supply of homes (market and affordable) within the Parish.
 - Furthermore, a cap should not be placed on additional overall planned housing supply (i.e. where this is below that suggested to be needed by household projection informed housing requirements assessments) based on the level of overall housing considered necessary to enable the provision of an assessed need for affordable housing. As there is no up to date assessment of net current and future affordable housing needs for the Parish there is no reliable starting point for such an assessment.

Past Dwelling Completion Rates

- The upper end of the CPHNA 20 to 25 residual overall housing requirement appears to be based on a review of past dwelling completion rates. However, neither

Government guidance nor the informal 'Locality' Toolkit referred to by the CPHNA suggest that: future planned supply should be restricted to past delivery rates, or that these should be used as some sort of proxy assessment of an areas housing requirement. The CPHNA conclusion that based on past dwelling completion rates and after deductions for planned and past supply there is a net residual requirement for between 4 and 25 dwellings in the Parish between 2006 and 2026 is based on flawed reasoning and is unreliable.

- If anything, past housing completion rates compared to the CPHNA DCLG household projection based assessment of housing need from 2006 suggest a significant under provision of new homes in the Parish.

DCLG Household Projections

- 3.6.3 It is surprising that the CPHNA has not placed a greater emphasis on its conclusions on a residual housing need for 58 dwellings 2006 to 2026 based on DCLG Household Projections; official household projections are the most appropriate starting point for analysis in line with wider Government guidance. The Government Technical Consultation on updates to national planning policy and guidance (October 2018) confirms that the DCLG 2014-based Household Projections remain the Government's preferred starting point despite the publication of the ONS 2016-based household projections.
- 3.6.4 The CPHNA appears to acknowledge in paragraph 10.6 that the methodology it has applied is somewhat crude (i.e. a simple projected increase in households at a Parish level in line with rates of household growth occurring across Wiltshire as a whole in the absence of small area level household projections).
- 3.6.5 Pioneer has, therefore, undertaken additional modelling which uses small area Mid-2017 Population Estimates for the Parish across all ages and by gender in conjunction with population projections by age cohort and household representative rates at a local authority level (based on DCLG 2014-based Household Projections detailed data for modelling and analysis) to provide a projection of households at a Parish level.
- 3.6.6 Whilst this still assumes growth occurring at the same rate within each age cohort by gender in the Parish as that across the wider area, it is able to reflect demographic differences in the age / gender profile between areas. It therefore provides a finer grained consideration of an areas likely projected household growth than the approach within the CPHNA.

- 3.6.7 The detailed findings are set out in Section 3.1 of this report, but to enable comparison with the CPHNA projection Pioneer models a 7 year period from 2019 to 2026 (starting at the current year in line with the NPPF Standard Methodology). This suggests a baseline need for 4.3 dwellings per annum in the Parish for this period, and of 6 to 7 dwellings per annum following standard methodology based affordability adjustments (i.e. 42 to 49 dwellings to 2026). However, the affordability adjustment is insufficient to reflect the suggested extent of previous undersupply in the Parish since 2006, which is significant given increased affordability pressures at a Parish level.
- 3.6.8 A combination of CPHNA (2006 to 2018) and Pioneer modelling (2019 to 2026) without applying an uplift to reflect affordability in line with national guidance where past under delivery is taken into consideration, suggests a need for c.83 dwellings for the whole 20 year period. After CPHNA past supply / planned supply assumptions are deducted a net shortfall of 60 dwellings is suggested for the remaining period to 2026 (coincidentally very similar to the 58 residual dwelling requirement suggested by the CPHNA DCLG household projection²⁰).
- 3.6.9 However, this only extends over the next 7 years and arguably the Neighbourhood Plan should also be thinking about a longer Plan period. Unless planned supply is increased the suggested residual unmet housing requirement in the Parish is likely to keep increasing.

Joint Swindon and Wiltshire Strategic Housing Market Assessment 2017

- 3.6.10 The CPHNA takes outputs from the SWSHMA and seeks to apply these on a pro-rata basis at a Parish level and concludes a residual unmet need for 48 dwellings up to 2036. In its conclusions the CPHNA suggests that this is unreliable as it assumes growth rates in line with those applicable to larger settlements in the Swindon HMA designated by the SWSHMA.
- 3.6.11 However, the more prominent issue is that the CPHNA residual housing need conclusion based on the SWSHMA is unreliable as it adds just 3 dwellings in response to unmet housing need. This fails to reflect the suggested extent of housing undersupply against the CPHNA's own household projection based assessment of housing need. When this is factored into the calculation, and after supply is deducted, a net additional need for 87 homes in the Parish up to 2036 is suggested.

²⁰ this probably reflects the similar demographic age profile between the Parish and the wider local authority area

3.6.12 At 87 homes over 17 years (2019 to 2036) this is a lower dwelling per annum average than the annual average residual requirement suggested based on DCLG 2014 household projection modelling (58 to 60 over 7 years). The CPHNA concerns about growth may therefore be overstated, although the fact that the SWSHMA draws on 2012 DCLG projections means that the Pioneer DCLG 2014-based household projection based modelling represents a more appropriate basis for understanding likely housing needs.

Core Strategy Planned Housing Supply Distribution

3.6.13 The CPHNA suggests that planned housing supply within the CS suggests a residual housing requirement in the Parish for nil to 14 dwellings.

3.6.14 However, the approach applied does not reflect that Core Policy 1 directs development to Large Settlements (of which Crudwell is one) ahead of Small Villages or other undefined settlements. On this basis, if a proportionate distribution of the 510 planned 'approximate' supply is to be applied to Crudwell this should reflect its scale in the context of the other Large Villages in the MCA outside of Malmesbury town.

3.6.15 Based on CPHNA Table 4 Crudwell accounts for 18.81% of these Large Villages, which, if applied to the 'approximate' planned supply of 510 homes outside of Malmesbury town and net of supply suggests a residual housing requirement for c.73 homes 2019 to 2026 in the Parish.

4 Conclusion

4.1 The CPHNA conclusion that between 20 and 25 additional homes within the Parish would be appropriate to 2026 (based on past supply rates and evidentially questionable conclusions on affordable housing need) is unreliable as it is based on an approach that bears no resemblance to national guidance recommendations for the assessment of overall housing need. Furthermore, the CPHNA does so without setting out any exceptional circumstances for this departure.

4.2 Pioneer has reviewed the other approaches set out in the CPHNA to calculating a residual housing requirement for the Parish and can summarise these revised outputs taking into account various concerns regarding the CPHNA methodology alongside the CPHNA conclusions as follows:

Figure 4.1

Basis of Calculation	Residual (Net of Supply) Crudwell Parish Housing Requirement		Period
	CPHNA	Pioneer	
DCLG 2014-based household projection	58	60	2019 - 2026
2017 SWSHMA	48	87	2019 - 2036*
Core Strategy Core Policy 13	0 - 14	73	2019 - 2026

*The CPHNA reports this against a 2006 – 2026 period, but in reality it is a residual requirement that applies to a 2019 – 2036 period as the SWSHMA extends up to 2036

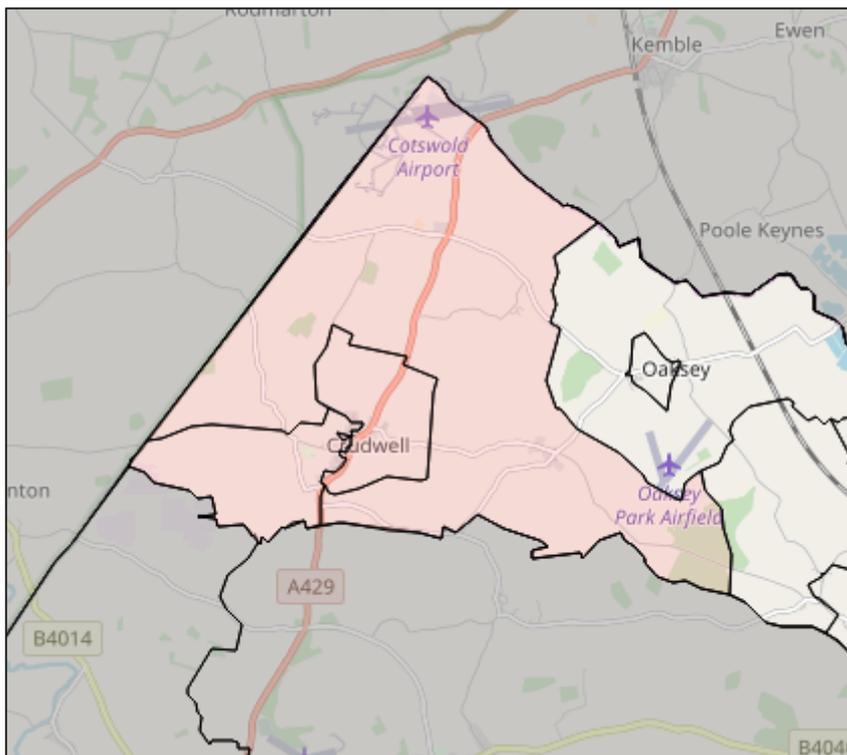
- 4.3 Whilst not intended as a replacement Housing Needs Assessment, Pioneer analysis suggests that a minimum additional provision of 60 homes in the Parish to 2026 would be closer to the kind of levels suggested to be necessary based on additional DCLG 2014-based household projection modelling undertaken by Pioneer, particularly as the SWSHMA draws on 2012 DCLG projections and Government has expressed a clear preference for the use of 2014-based projections rather than the ONS 2016-based projections.
- 4.4 A significant proportion of the implied 60 home requirement is attributable to unmet past housing need, and as such additional provision is needed in the short term as opposed to the at latter end of the assessed period. However, this only extends over the next 7 years and arguably the Neighbourhood Plan should also be thinking about a longer Plan period than 7 years given recent efforts to prepare the JSF.
- 4.5 Looking ahead to 2036 Pioneer projections suggest a requirement for an additional 59 dwellings (see Figure 3.1.2) – added to the unmet need for 40 dwellings suggested by the CPHNA (i.e. 52 minus 12 completions) and net of a further 11 dwelling supply suggested by the CPHNA this suggests c.88 dwellings are needed 2019 to 2036.
- 4.6 Based on a proportionate distribution of CS planned housing supply the Parish should arguably have seen c.96 dwellings allocated to Crudwell Parish 2006 to 2026; only 23 are suggested to have been provided/planned.
- 4.7 Based on past supply levels (suggested in Table 3 of the CPHNA to equate to 1.3 per annum 2001 to 2016) it would take c.46 years to deliver the 60 homes (minimum) suggested to be needed by 2026.
- 4.8 The ‘approximate’ planned level of housing supply within the CS for the non-Malmesbury section of the MCA and for Wiltshire as a whole is based on an 8 year old SHMA which

precedes the current framework, was published during a period of ongoing economic constraint and does not represent a ceiling on proposed development.

- 4.9 Constraints to household formation (such as an under provision of new homes) will worsen the ability of rural Parishes such as Crudwell to retain / attract working age and family households to contribute towards a healthy local economy and a balanced community. New homes for both family households and for older households to downsize into would be beneficial and may necessitate uplifts in housing provision over and above baseline levels of provision if such a policy were to be pursued in the interests of the local community.
- 4.10 The lack of a ceiling limit in the CS on planned supply for the MCA outside of Malmesbury town and the direction of development away from Small Villages and undefined settlements places an increased emphasis on the delivery of homes in Large Villages such as Crudwell to meet not only Parish needs but also the housing needs within those other areas. Further work is needed on the assessment of housing requirements within the Parish taking all these factors into consideration if an appropriate level of provision is to be planned for within the Neighbourhood Plan for all facets of the local community.

5 Appendix 1

Census Output Areas within Crudwell Parish



Census Output Areas: E00162639, E00162640, E00162641

APPENDIX 2 – COMMENTARY ON SAVED LOCAL PLAN ALLOCATIONS INCLUDED IN DELIVERABLE SUPPLY WHICH HAVE A RECORD OF NON-IMPLEMENTATION

Site name	Reference	Suggested delivery in the HLSSS	Comments
Quemerford House and Mill	2/LPA/14	3 dwellings in 2020/2021	<ul style="list-style-type: none"> • Brownfield site allocated in the North Wiltshire Local Plan in 2006 for 16 dwellings • Permission for 3 dwellings was granted in September 2007 and has not yet been bought forward (ref: N/07/02536/FUL) • This site therefore has a clear record of non-implementation
Land off Oldfield Road, Westbury	5/LPA/49	15 dwellings in 2023/2024 15 dwellings in 2024/2025	<ul style="list-style-type: none"> • Brownfield site that was allocated in the West Wiltshire Local Plan in 2004 for 30 dwellings • However, Appendix 3 of the HLSS states that this site is not available in the next 5 years and is therefore not deliverable. • This site should therefore not be included in the Council’s breakdown of deliverable supply
Station Road, Westbury	5/LPA/32	35 dwellings in 2019/2020 35 dwellings in 2020/2021	<ul style="list-style-type: none"> • Allocated for 90 dwellings in the West Wiltshire Local Plan in 2004 as an urban brownfield allocation • However, it is evident that this site also has a clear record of non-implementation with no development coming forward at the site since its allocation some 15 years ago. • Therefore, its ability to deliver any housing over the plan period is highly questionable given its track record of non-implementation.

APPENDIX 3 – COMMENTARY ON DELIVERABILITY OF PROPOSED ALLOCATIONS IN THE DRAFT WHSAP

Site name	Reference	Comments
Upper Studley, Trowbridge	H2.5	<p>The capacity of this site has been increased from 20 to 45 dwellings as part of the proposed changes.</p> <p>The EA has raised concerns regarding increased level of development suggested and whether this can occur without encroaching into land in flood zones 2 and 3.</p> <p>Therefore, there are outstanding questions as to whether this site can accommodate the increased level of development.</p>
Elizabeth Way, Trowbridge	H2.3	<p>The capacity of this site has been increased from 205 to 355 dwellings as part of the proposed changes.</p> <p>The EA has raised concerns regarding the increased numbers at this site and whether the site can adequately accommodate the increased levels of development suggested without encroaching into land in flood zones 2 and 3.</p> <p>Therefore, there are outstanding questions as to whether this site can accommodate the increased level of development.</p>
Elm Grove Farm	H2.1	<p>The capacity of this site has been increased from 200 to 250 dwellings as part of the proposed changes.</p> <p>This is despite the Council's Sustainability Appraisal Report (dated May 2018) previously identifying a reduced capacity from 274 dwellings to 231 dwellings was appropriate following the site being tested against the SA objectives.</p> <p>Therefore, it is unclear whether the development of 250 dwellings at this site can be successfully accommodated in line with the SA objectives as previously noted by the Council.</p>
Whitehorse Business Park	H2.2	<p>The capacity of this site has been increased from 150 to 175 dwellings as part of the proposed changes.</p> <p>As identified in the SA work undertaken by the Council, the HRA screening assessment identified that any development at Trowbridge could contribute towards impacts upon the Bath and Bradford on Avon Bats SAC through habitat loss and disturbance. The HRA advises that development within easy walking distance of the Biss / Green Lane Woods core roosting area is at high risk of failing an appropriate assessment, and consideration should be given to removing these options from the plan at this stage.</p> <p>Whilst it is acknowledged that options further from the woods are lower risk it is stated that these will still require some mitigation. It also states that all options in Trowbridge will require further assessment. Whilst it identifies that this site lies outside the core roosting zone and suggests that development would therefore be unlikely to lead to significant adverse impacts on the SAC, we are concerned that delays to development of this site may occur as a result of its more sensitive ecological issues. Para 4.10 of Topic Paper 3 (HLS addendum) highlights the issues in respect of the Habitats Regulations and subsequent mitigation strategy have resulted in delays for the strategic allocation at Ashton Park, Trowbridge, and this site is likely to have similar issues to contend with. Therefore, questions must</p>

		be asked as to whether this site can realistically deliver 175 dwellings over the remaining plan period.
Bore Hill Farm, Warminster	H2.8	<p>The EA has raised concerns regarding the allocation of this site in respect of potential odour issues in respect of the adjacent waste management facility.</p> <p>The EA identifies that whilst they are working with the site operator to try and address this problem, it is an issue for many existing residents and the EA.</p> <p>As a result, whilst not resulting in an outright objection, the EA has stated that they are "confident in saying that odour is very likely to be an issue for new residents at Bore Hill Farm in the future. In light of this, we would encourage Wiltshire Council to carefully consider the allocation of this site for housing."</p> <p>There are therefore questions surrounding the proposed allocation of this site for 70 dwellings that are unresolved.</p>
Land East of the Dene, Warminster	H2.7	<p>Historic England has stated that at present the allocation of the site is inappropriate as it cannot <i>"be demonstrated with any degree of confidence that a residential scheme could come forward to accord with the objectives of the Plan and its specific conditions for the site, legislation, national policy and guidance in respect of the great weight that needs to be afforded to the conservation of affected heritage assets and their setting."</i></p> <p>There are therefore questions surrounding the proposed allocation of this site for 100 dwellings which need to be considered further.</p>

