

19th December 2013

Mr A Seaman
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Economic Development and Planning
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Your ref:
Our ref : AC/PT

Dear Mr Seaman

Re: Wiltshire Core Strategy

Thank you for your letter of 2 December 2013 and confirmation of receipt of the latest bundle of Examination documents.

As you appreciate, a priority for the Council is to have a sound plan in place as soon as possible and to this end your commitment to provide us with the opportunity to address the issues you have identified in your letter is welcomed.

As requested, we have considered the points in your letter and set out below how the Council wishes to proceed with the matters raised. I will of course write to you again once we have undertaken the necessary work to provide a full response to the matters you raise.

In the interest of maintaining progress on the plan could you please confirm that you are happy with the approaches we are proposing in response to the issues you raise, as set out below?

Housing

I note that you are minded to find that the Core Strategy housing requirement should be expressed as a minimum towards the upper end of the range that has been assessed within the Council's Sustainability Appraisal as 35,800 to 42,100.

This can be established within the Core Strategy by replacing all references to the housing requirement of 37,000 within the draft plan with 42,000 homes. In particular, Core Policy 2 'Delivery Strategy' as the policy relating to the housing requirement would need to be revised.

The higher housing figure would also need to be disaggregated across the three Housing Market Areas (HMA) and distributed at the Community Area level (Principal Settlements, Market Towns and in the South Wiltshire HMA the Local Service Centres, and community area remainders). In addition to Core Policy 2, corresponding changes would also be needed to the housing requirements within each Community Area Strategy policy.

We are therefore reviewing the evidence to determine what the appropriate level of growth would be for each HMA and are minded to use a methodology that is based on the distribution of the additional growth on a proportionate basis, in order to maintain the integrity of the spatial strategy and current balance of growth between each area. We intend to test this at a community area level to ensure consistency with the NPPF and maintain a distribution of growth consistent with Core Policy 1. In doing this, we are mindful that there may be constraints, greater potential or other issues in a particular area that will mean some adjustment of the figure for some Community Areas. The Sustainability Appraisal process will help inform what the appropriate figures are for a particular area.

This work will also consider how the housing land supply can be met against the increased housing requirement. However, we anticipate that it will be necessary for a Site Allocations Development Plan Document (DPD) to be prepared in order to identify new sites and this will be programmed within a revised Local Development Scheme (LDS), which will be considered by Cabinet at their meeting on 21st January 2014.

Your thoughts on the appropriateness of this approach would be appreciated.

If you can confirm that this is acceptable to you in principle we will, following completion of the work, provide the requisite changes to the Plan including the necessary modifications to Core Policy 2, amended community area policies and a revised housing trajectory to demonstrate supply. This will be accompanied with supporting documentation as necessary.

Affordable Housing

As suggested, we have reviewed the evidence relating to levels of affordable housing and conclude that it would be prudent to revise this in order to provide appropriate justification for Core Policy 43 and its supporting text. We therefore propose to instigate an independent review of affordable housing viability in order to look at viable alternatives to inform Core Policy 43 so that the objectives of the Core Strategy may be fulfilled and are making arrangements to expedite this. It is anticipated that we will have an initial report by the first week of February. It is our intention to involve the Swindon and Wiltshire Housing Market Partnership in this work.

Again your thoughts on this approach would be welcomed.

Gypsy and Travellers

In order to provide a more robust indication of pitch requirements for Core Policy 47, we propose to review and update the evidence in Topic Paper 16 in the form of an addendum to take into account the points you raise regarding overcrowding on local authority sites, unauthorised developments and encampments; and pitch supply in the north and east HMA. The outcome would inform proposed changes to the permanent pitch and transit provision requirements in Core Policy 47. This would enable the council to suggest permanent pitch and transit provision requirements, based on a more robust evidence base, via a proposed change to Core Policy 47.

In addition, the council will undertake a complete and comprehensive review of local need in the form of a full Gypsy and Traveller Accommodation Assessment (GTAA) with a base date of January 2014. This work would be undertaken as a matter of urgency culminating

in a swift review of pitch requirements in Core Policy 47 either by way of a single issue review or by widening the scope of the current Gypsy and Traveller Site Allocations DPD, as identified in the LDS, to encompass proposals and formal examination of this aspect. Further work on a revised LDS can determine which of the two would be the most timely and effective, if the general approach is acceptable to you. The need of travelling showpeople will be addressed as part of the GTAA and subsequent DPD.

Chippenham

In the light of your comments on Chippenham and the approach to development allocations, we consider that the most expedient way forward would be to prepare a development plan document specific to Chippenham and for Core Policy 10 to be modified through the removal of the strategic allocations. In order to provide the right context for this, it is proposed that the level of growth for the town be identified within the Core Strategy as set out above.

Settlement boundaries

We are able to confirm that the review of the settlement boundaries can be undertaken as part of the Site Allocations DPD referred to above and this can be referenced within the Core Strategy in the supporting text to Core Policy 2.

Retail Frontages

The Council's preferred approach to update the designated town centres and their frontages would be through the partial review, as already identified in the LDS. The timetable for this will be updated in the revised LDS.

Revision to Local Development Scheme

As referred to above, we are currently working on a revised LDS for approval by Cabinet at its meeting on 21st January. We will be able to let you have a copy of the draft report early in the New Year when it is available.

If you should be minded to accept our suggestions in principle then I will write again setting out the programme of work that we will undertake to allow this process to move forward. With holiday season upon us, an early reply would be appreciated.

Yours sincerely



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