

The Emerging Spatial Strategy Consultation Response Form

Ref:

(For official use only)

The overarching 'Emerging Spatial Strategy' paper identifies the proposed overall level of new homes and employment land for each main settlement and rural part of the HMA, over the plan period, together with what remains to be planned for once existing housing completions and commitments have been accounted for.

To view the Emerging Spatial Strategies paper please visit the Council's Local Plan Review Consultation page on it's website at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Please return to Wiltshire Council, by 5pm on Monday 8th March 2021.

By post to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: spatialplanningpolicy@wiltshire.gov.uk

This form has two sections:

Section One – Personal details

Section Two – Your comments on the Emerging Spatial Strategy. Please use a separate sheet for each representation.

Section One – Personal details

*if an agent is appointed, please fill in your Title, Name and Organisation but the full contact details of the agent must be completed.

	1. Personal details	2. Agent's details (if applicable)*
Title		MS
First name		SUE
Last name		GREEN
Job title (where relevant)		PLANNING MANAGER – LOCAL PLANS
Organisation (where relevant)		HOME BUILDERS FEDERATION (HBF)
Address Line 1		c/o 80 NEEDLERS END LANE
Address Line 2		BALSALL COMMON
Address Line 3		WARWICKSHIRE

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Section Two – Please enter any comments you have regarding the Emerging Spatial Strategy in the box below.

Comment:

The HBF submit the following comments on the Emerging Spatial Strategy for Wiltshire :-

PLAN PERIOD

The Council is proposing a plan period of 2016 – 2036. The HBF consider that this plan period is inappropriate. If the Wiltshire Local Plan Review (LPR) is adopted in the first quarter of 2023 as envisaged in the Council’s latest Local Development Scheme (July 2020), the start date of 2016 will be at least six years in the past, for many rural settlements this means very limited development until after the plan end date because of delivery between 2016 and the LPR adoption date (see Table 2.3 in Empowering Rural Communities consultation document). This is contrary to the 2019 NPPF’s promotion of sustainable housing development in rural areas, where it will enhance or maintain the vitality of rural communities (para 78). With regards to the proposed plan period end date of 2036, the 2019 NPPF sets out that strategic policies should look ahead over a minimum 15 year period from the date of adoption, to anticipate and respond to long-term requirements and opportunities (para 22). If the LPR is adopted in the first quarter of 2023, there would be only 13 years remaining. The HBF consider that an appropriate plan period is 2020 – 2040. This recommendation should be considered by the Council.

HOUSING REQUIREMENT

As set out in the 2019 NPPF, strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period (para 65). The determination of the minimum number of homes needed should be informed by a LHN assessment using the Government’s standard methodology unless exceptional circumstances justify an alternative approach (para 60). In Wiltshire, there are no exceptional circumstances to justify an alternative approach.

The NPPG sets out the standard methodology for calculating the LHN figure using demographic data (based on 2014 MHCLG Sub National Household Projections (SNHP)) and an affordability adjustment (based on the latest ONS affordability ratios) (ID 2a-004-20190220). Using the standard methodology, the Council have calculated the minimum LHN for Wiltshire is 2,042 dwellings per annum equivalent to 40,840 dwellings over the plan period 2016 – 2036. This calculation is based on 2014 SNHP, 2019 as the current year and 2018 affordability ratio of 9.82. As set out in the NPPG, the LHN is calculated at the start of the plan-making process but this number should be kept under review and when appropriate revised until the Local Plan is submitted for examination (ID 2a-008-20190220). The minimum LHN for the County may change as inputs are variable, which should be borne in mind by the Council.

The NPPG clearly states that the standard methodology is the minimum starting point in determining the number of homes needed. It does not produce a housing requirement figure (ID 2a-010-20190220). The NPPG explains that “circumstances” may exist to justify a figure higher than the minimum LHN (ID 2a-010-20190220). The “*circumstances*” for increasing the minimum LHN are listed in the NPPG, which include, but are not limited to, situations where increases in housing need are likely to exceed past trends because of growth strategies, strategic infrastructure improvements, agreeing to meet unmet need from neighbouring authorities or previous levels of housing delivery / assessments of need that are significantly greater than the outcome from the standard methodology (ID 2a-010-20190220).

The NPPG indicates that if previous housing delivery has exceeded the minimum LHN, the Council should consider whether this level of delivery is indicative of greater housing need (ID 2a-010-20190220). The 2020 Housing Delivery Test (HDT) Results identify housing completions of 2,406 dwellings in 2017/18, 2,766 dwellings in 2018/19 and 2,548 dwellings in 2019/20, which exceed the minimum LHN (2,042 dwellings per annum) as well as both adopted (2,100 dwellings per annum) and proposed (2,282 dwellings per annum) housing requirements.

The 2019 NPPF seeks to achieve sustainable development by pursuing economic, social and environmental objectives in mutually supportive ways (para 8). A lack of labour should not become a constraint on realising the economic growth potential of the County. The Council should be seeking to achieve a sustainable balance between employment and housing growth.

The Council should also recognise economic benefits of housing development in supporting local communities as highlighted by the HBF’s latest publication Building Communities – Making Place A Home (Autumn 2020). The Housing Calculator (available on the HBF website) based on The Economic Footprint of House Building (July 2018) commissioned by the HBF estimates for every one additional house built in Wiltshire, the benefits for the local community include creation of 3 jobs (direct & indirect employment), financial contributions of £27,754 towards affordable housing, £806 towards education, £297 towards open space / leisure, £1,129 extra in Council tax and £26,339 spent in local shops.

The NPPG states that total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments. As set out in the NPPG, an increase in the total housing figures may be considered where it could help deliver affordable housing (ID 2a-024-20190220). Affordable housing delivery should be a key priority for the Council. In the last decade housing affordability across the County has worsened from a median house price to workplace-based earnings ratio of 7.66 in 2009 to 9.63 in 2019, which is higher than in England (6.39 in 2009 / 7.83 in 2019) and in the South West (7.24 in 2009 / 8.79 in 2019). The ratio of 9.63 is a Wiltshire-wide figure, which may disguise a worse affordability ratio in individual Housing Market Areas (HMA) and / or towns, therefore the medium house price of £257,000 may be much greater in rural areas. A housing requirement above the minimum LHN will make some contribution towards delivering a greater number of affordable housing even if not all affordable housing needs can be met.

The HBF consider that in Wiltshire, “circumstances” exist to justify a housing requirement above the minimum LHN. As set out in the Swindon & Wiltshire LHN Assessment 2019 by ORS dated April 2019, the minimum LHN has been adjusted for longer-term migration and economic forecasts resulting in a higher figure of 45,630 dwellings (2,282 dwellings per annum). This higher figure is proposed as the housing requirement. The Council’s sustainability appraisal assessment of alternative development strategies also concludes that there are no adverse effects of such significance that would prevent this higher figure being progressed as the basis for further work developing the spatial strategy.

As set out in the NPPG, the Government is committed to ensuring that more homes are built and supports ambitious Councils wanting to plan for growth (ID 2a-010-20190220). The NPPG states that a higher figure “*can be considered sound*” providing it “*adequately reflects current and future demographic trends and market signals*”. The HBF support the Council in identifying a housing need, which is greater than the minimum LHN. However, the NPPG does not set any limitations on a higher figure, which is a matter of judgement. The Government’s objective of significantly boosting the supply of homes set out in the 2019 NPPF remains (para 59). The HBF believe that the Council should have been more ambitious. The proposed housing requirement of 2,282 dwellings per annum is only 182 dwellings per annum above the adopted housing requirement of 2,100 dwellings per annum. Whilst the proposed housing requirement is greater than the minimum LHN of 2,042 dwellings per annum, it is below previous completion figures identified in the 2020 HDT. The proposed housing requirement is a “business as usual” scenario rather than a significant boost to the supply of homes. The Council’s housing requirement should be expressed as a minimum figure.

THE SPATIAL STRATEGY AND THE DISTRIBUTION OF DEVELOPMENT

The County has been sub-divided into four HMAs for Chippenham, Salisbury, Swindon (the Wiltshire part) and Trowbridge to which housing figures have been assigned as 20,400 dwellings, 10,975 dwellings, 3,255 dwellings and 11,000 dwellings respectively. The HBF note that the four proposed HMAs differ from the three previously defined HMAs of the adopted Wiltshire Core Strategy.

As set out above the Government’s standard methodology for calculating LHN establishes the Wiltshire-wide LHN. There is no standard methodology for sub-division set out in the NPPG. In the Swindon & Wiltshire LHN Assessment 2019, the Council has devised two alternative scenarios for disaggregation to the four identified HMAs based on 5 and 10 year migration trends. The disaggregated figures above represent alignment of future jobs / workers & housing and the 10 year migration trend. The HBF note that the Council’s chosen disaggregation scenario focusses most growth to the Chippenham HMA in comparison to the more evenly dispersed disaggregation if the 5 year migration trend scenario is used. When determining the distribution of growth, the Council should consider market capacity and deliverability.

The spatial strategy sets out the roles of settlements and the apportionment of growth to settlements. The settlement hierarchy set out in Core Policy 1 – Settlement Strategy of the adopted Wiltshire Core Strategy will not be changed by the LPR. This hierarchy comprises of Principal Settlements (Chippenham, Salisbury and Trowbridge), Market Towns (Amesbury, Bradford-on-Avon, Calne, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Royal Wootton Bassett, Tidworth & Ludgershall, Warminster and Westbury), Local Service Centres, Large Villages and Small Villages. Growth will be focussed on the Principal Settlements and Market Towns. The LPR will set housing requirements for each main settlement (Principal Settlements & Market Towns) and designated areas for neighbourhood planning. Within the main settlements the housing requirement is translated into a brownfield target. The housing requirement for Local Service Centres and Large Villages will be disaggregated according to the size of the settlement and key constraints (see Appendix 1 of Empowering Rural Communities consultation document).

For the Chippenham HMA, after the deduction of completions and commitments the residual housing requirement (at 1 April 2019) is 9,860 dwellings. The LPR will set out how growth will be accommodated at Chippenham and Melksham, which will involve the allocation of greenfield sites. For the Salisbury HMA, after the deduction of completions and commitments the residual housing requirement (at 1 April 2019) is 2,655 dwellings.

The LPR will set out how growth will be accommodated at Salisbury and Amesbury, which will involve allocating greenfield sites. For the Swindon HMA, after the deduction of completions and commitments the residual housing requirement (at 1 April 2019) is 1,430 dwellings. The LPR will set out how growth will be accommodated at Royal Wootton Bassett, which will involve allocating greenfield sites. Elsewhere, there may be scope for Neighbourhood Plans to allocate sites to meet strategic requirements for housing. For Trowbridge HMA, after the deduction of completions and commitments the residual housing requirement (at 1 April 2019) is 3,205 dwellings. The LPR will set out how growth will be accommodated at Trowbridge and Westbury, which will involve allocating greenfield sites. Elsewhere, there may be scope for Neighbourhood Plans to allocate sites to meet strategic requirements for housing.

The Planning for Chippenham, Salisbury and Trowbridge Statements specify preferred sites. The Planning for Market Town Statements present reasonable alternative sites for consideration. In Market Towns, only a small number of site allocations will be needed, which may be either selected by local communities if they are progressing or reviewing a Neighbourhood Plan or the LPR. The role of rural settlements is set out in the 'Empowering Rural Communities' consultation document.

The HBF have no comments on individually identified sites but the correct assessment of availability, suitability, deliverability, developability and viability of these sites is critical. Assumptions on lapse rates, non-implementation allowances, lead in times and delivery rates contained within the overall HLS, 5 YHLS and housing trajectory should be realistic and supported by relevant landowners / promoters / developers.

The LPR's strategic policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver the County's housing requirement. This sufficiency of housing land supply (HLS) should meet the housing requirement, ensure the maintenance of 5 Years Housing Land Supply (YHLS) and achieve HDT performance measurements. The Council's overall HLS should include a short and long-term supply of sites by the identification of both strategic and non-strategic allocations for residential development.

Housing delivery is maximised, where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector. There should be a wide range of sites by both size and market locations, which provides access to suitable land for small local, medium regional and large national housebuilding companies as well as providing opportunities for a wide range of different types of dwellings to meet the housing needs of all households.

The Council's overall HLS should also have sufficient flexibility to respond to changing circumstances, to treat the housing requirement as a minimum rather than a maximum and to provide choice and competition in the land market. There is no numerical formula to determine an appropriate contingency, but greater numerical flexibility is necessary where HLS is dependent on a few large strategic sites or locations than in cases where HLS is more diversified. The HBF always suggests as large a contingency as possible (at least 20%).

Under the 2019 NPPF, the Council should identify at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 68). For Wiltshire, 10% of the housing requirement is 4,563 dwellings. The Council should confirm compliance with this aspect of national policy.

GROWTH AND CLIMATE CHANGE

The Council is referred to the HBF's responses in the Addressing Climate Change and Biodiversity Net Gain through the Local Plan Consultation Response Form.

NEIGHBOURHOOD PLANNING

The LPR sets the strategic context for neighbourhood planning. Local communities will be encouraged to determine for themselves where additional development takes place by the preparation of a Neighbourhood Plan. However, as set out in the 2019 NPPF, Neighbourhood Plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies (para 29).

THE ROLE AND FUNCTION OF BROWNFIELD TARGET

Where Neighbourhood Plans are being prepared or reviewed in parallel to the LPR, the Council advocates that identified brownfield sites can be included in the HLS and a corresponding amount of land can be removed from the residual housing requirement thereby reducing the amount of greenfield land to be allocated. However, any identified brownfield sites should be robustly tested against the 2019 NPPF's definitions of deliverable and developable before inclusion in the HLS.

The Council proposes to set an indicative "Brownfield Target" for the number of new homes to be built on previously developed land (PDL). These Brownfield Targets will be used as the basis for housing requirements for designated neighbourhood areas at main settlements (Chippenham, Salisbury, Trowbridge, Amesbury, Bradford-on-Avon, Calne, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Royal Wootton Bassett, Tidworth & Ludgershall, Warminster and Westbury). After adoption of the LPR, these figures should not be re-tested at Neighbourhood Plan examinations, unless there has been a significant change in circumstances affecting that requirement.

The Council's proposed policy approach is confusing for the following reasons :-

- a housing requirement should be based on a calculation of housing need. The brownfield target is derived from past windfall consents on PDL, which confuses housing needs with sources of HLS ;
- it is unclear how housing requirements for designated neighbourhood areas outside main settlements will be established ;
- there are different timeframes, the residual housing requirement is for the plan period 2016 – 2036 whilst the brownfield target is 2021 – 2031 ;
- any brownfield site identified to meet the brownfield target is a short to medium term development opportunity therefore the site must be deliverable rather than developable. A full assessment of suitability, availability, viability, etc should be undertaken to evidence deliverability.

The Council should not propose artificially phasing construction of large greenfield sites to ensure a priority is maintained on brownfield land. The 2019 NPPF's promotion of the effective use of land, in a way that makes as much use as possible of PDL (para 117) is not a brownfield first policy.

I wish to be notified of any future updates relating to the Local Plan Review:

YES: NO:

Clicking yes will add you to the planning policy contact database. This will mean you are kept informed of any future planning policy updates and consultations.

Further information on how the Spatial Planning Department treats your personally identifiable information can be found by reading the privacy notice available via the link below:

<https://www.wiltshire.gov.uk/planning-privacy-notice>

Here you will also find information about how and why your data may be processed and your rights under the Data Subject Information Notice section further down the page.

Signature: 

Date:

Thank you for completing this form.

Data Protection

Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk ."