

Empowering Rural Communities Consultation Response Form

Ref:

(For official use only)

The paper 'Empowering Rural Communities' looks at ways the Council's planning policies and proposals might be changed for rural communities along with suggesting scales of housing growth.

To view this document please visit the Council's Local Plan Review Consultation page on its 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 response to the questions. 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
Address Line 4		
Postcode		CV7 7AB

Telephone Number		07817 865534
Email Address		sue.green@hbf.co.uk

Section Two – Questions

Do you agree there should be a target of 40% affordable homes on all new schemes of more than five dwellings? What other approaches might there be?

Answer:

Any proposed changes to site thresholds (from 10 to 5 dwellings) and / or the percentage of affordable housing provision (from 30% to 40%) in the rural areas should be viability tested.

In plan-making, viability is inseparable from the deliverability of development. As set out in the 2019 NPPF, the contributions expected from development including the level & types of affordable housing provision required and other infrastructure for education, health, transport, flood & water management, open space, digital communication, etc. should be set out in the LPR (para 34). As stated in the 2019 NPPF, development should not be subject to such a scale of obligations that the deliverability of the LPR is threatened (para 34). The viability of individual developments and plan policies should be tested at the plan making stage. Viability is a key issue in determining the soundness of the LPR at Examination. Without a robust approach to viability assessment, land will be withheld from the market and housing delivery will be threatened, leading to an unsound LPR and housing delivery targets not being met.

The proposed site threshold change also pre-supposes that the Council's application for Designated Rural Status across the County is successful.

Do you agree with the approach set out in the suggested policy? If not, why not? How could it be improved?

Answer:

The HBF have no comments on community-led housing or the proposed revisions to Core Policy 44.

Do you think this approach is worth pursuing?

Please explain your answer

Answer:

The Council should carefully consider proposals to remove permitted development rights on small homes. The Council would not wish to be responsible for unintended consequences such as overcrowding if in the future the housing needs of residents change and they were unable to find suitable alternative accommodation.

What local evidence would be needed to justify applying restrictions like these?

Answer:

No HBF comment.

To comment on the housing figure that interests you, please state which area of the county the settlement falls within.

Answer:

See HBF answer below.

What do you think to the housing requirements for Local Service Centres and Large Villages? Should requirements be higher or lower? If so which ones and why?

Answer:

The HBF consider that housing requirements should be higher.

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). The 2019 NPPF also 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 only be 13 years remaining. The HBF consider that an appropriate plan period is 2020 – 2040. This recommendation should be considered by the Council.

If you have any further comments you wish to make, please detail them below.

No further HBF comments.

Future notification

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:

9/3/21

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 ."