



Forward Planning
Swindon Borough Council
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SENT BY E-MAIL AND POST

19th December 2017

Dear Sir / Madam

SWINDON LOCAL PLAN REVIEW – ISSUES & OPTIONS CONSULTATION

Introduction

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following comments in response to specific questions in the Council's consultation document. It is noted that contemporaneous consultations have been held on the Swindon & Wiltshire Joint Spatial Framework and the Wiltshire Local Plan Review to which the HBF will also be submitting separate representations.

Q1. Are there any cross-boundary planning issues that the Council should consider in preparing the Local Plan Review?

In preparing the Swindon Local Plan Review housing should be considered as an important cross-boundary issue. Housing needs should be met where those needs arise if this is not possible then there should be a bigger than local approach involving cross boundary collaboration across Council and / or Housing Market Area (HMA) boundaries so that the distribution of housing needs is led by a strategic planning process. Therefore the HBF is supportive of the principle of a Joint Spatial Framework to guide the overall pattern of development across Swindon and Wiltshire. It is understood that this Framework will set out the distribution of new jobs, homes and infrastructure. However it is disappointing and concerning that the Joint Spatial Framework is a non-statutory document which will not be subject to the same scrutiny of a statutory Development Planning Document. The Council should give further

consideration to the status of this document and whether or not a statutory Joint Local Plan should be prepared.

Furthermore the inter-relationship between the Swindon Local Plan Review, the Swindon & Wiltshire Joint Spatial Framework and the Wiltshire Local Plan Review is unclear. The Swindon & Wiltshire Strategic Housing Market Area Assessment (SHMA) Volume 1 dated June 2017 defines four sub HMAs within the administrative boundaries of the two Councils comprising of Swindon (including NE Wiltshire), Chippenham, Trowbridge and Salisbury. The defined boundaries of Swindon Council and the Swindon sub HMA do not coincide it is unclear if the plan area of the new Local Plan will reconcile this difference. The Council should provide further clarity on this issue.

The timing of the plan making process is also critical. The timing of the Swindon Local Plan Review is not the immediate review proposed at the previous Local Plan Examination. As set out in Table 1 the Council is aiming to adopt the new Local Plan in early 2021 which is 6 years after the adoption of the existing Plan and no quicker than the Government's proposal for 5 yearly reviews. It is suggested that the Council considers speeding up its proposed timetable for review of the Swindon Local Plan. Furthermore it is noted that the preparation of the Joint Spatial Framework and two Local Plan Reviews is concurrent therefore it is difficult to comprehend that the Framework is going to guide the Local Plan Review as set out.

The adopted Swindon Local Plan sets out a housing requirement of 22,000 dwellings (1,467 dwellings per annum) up to 2026. The new Local Plan will set out housing requirement for plan period 2016 – 2036. The Swindon & Wiltshire SHMA Report of Findings dated March 2017 sets out an OAHN of 72,157 dwellings calculated as :-

- 2014 SNPP plus 10 year migration trends of 67,606 dwellings (3,380 dwellings per annum) of which 27,540 dwellings are in Swindon and 40,066 dwellings are in Wiltshire ;
- An adjustment for concealed household/homeless to 68,459 dwellings ;
- A market signal uplift of 5% in Chippenham, 5% in Trowbridge and 15% in Salisbury to 71,118 dwellings (3,556 dwellings per annum) ;
- An under delivery of 1,000 dwellings between 2011 – 14 in Swindon.

A housing requirement of 73,000 dwellings is proposed and sub-divided as 29,000 dwellings in Swindon sub HMA (1,450 dwellings per annum) and 44,000 dwellings in Wiltshire (2,200 dwellings per annum) of which 22,250 dwellings in Chippenham sub HMA, 8,250 dwellings in Salisbury sub HMA and 13,500 dwellings in Trowbridge sub HMA.

The affordable housing need is calculated as 23,100 dwellings (1,155 dwellings per annum).

At this time the HBF would criticise the Council's OAHN calculation for the limited adjustments for market signals, no adjustment to support economic growth and no uplift to the overall housing provision to assist in delivery of affordable housing. The OAHN for Swindon should not be under-estimated.

In the Housing White Paper the Government has also been critical of Councils not undertaking an honest assessment of housing needs. As a consequence the Government has consulted on proposals for a standard methodology for the calculation of OAHN. By the time of Swindon Local Plan Review Examination it is likely that a standard methodology for the calculation of OAHN will have been implemented by the Government. The Council should give consideration to the implications of the Government's proposal for a standardised methodology for OAHN.

Q3. Please suggest any changes that you think should be made to the vision for the Local Plan Review.

As set out the vision for the Local Plan Review excludes any reference to housing. This omission should be rectified by the inclusion of references to housing in the vision.

Q5. Please suggest any changes that you think should be made to the objectives for the Local Plan Review.

The ten strategic objectives should be re-considered and if necessary updated in the course of the Review. The objectives of the Swindon Local Plan should be consistent with the objectives of the Joint Spatial Framework (also see answer to Q1 above).

Q6. Should the settlement hierarchy for the Borough as defined above be carried forward into the Local Plan Review?

The adopted Local Plan directs development to within Swindon's urban area beyond which rural development is focused at Highworth / Wroughton and limited development is permitted in the remaining villages proportional to their size and function. The existing settlement hierarchy should be re-considered in the Local Plan Review. A more flexible approach to development in the rural area may be necessary given the re-definition of the four sub HMAs and the housing distribution proposed by the Joint Spatial Framework (also see answer to Q1 above).

Q8. Are there any other important spatial principles that should guide the development strategy in the Local Plan Review?

It is agreed that in the achievement of sustainable development the Council should balance economic, social and environmental dimensions. The spatial principles guiding the development strategy should be consistent between the Swindon & Wiltshire Joint Spatial Framework and the Local Plan Review (also see answer to Q1 above).

Q9. How should the plan balance the short-term need for additional housing with the longer term development strategy for the area?

On adoption of the Local Plan Review the Council must be able to demonstrate a 5 Year Housing Land Supply (YHLS) which should also be maintainable throughout the plan period. A broad portfolio of housing sites

maximises housing delivery because a wide variety of sites by size, location and market type provides house builders of all types with access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets whilst large strategic sites may have multiple outlets usually increasing the number of sales outlets available inevitably means increasing the number of housing site allocations in the case of Swindon large existing strategic sites should be complimented by smaller scale non-strategic sites. This approach is also promoted in the Housing White Paper because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector. Without reasonable certainty that the Council has a 5 YHLS the Local Plan Review could not be considered sound as it would be neither effective nor consistent with the NPPF and on adoption its policies for the supply of housing would be instantly out of date (para 49).

A plan led system should also include contingencies therefore the Council's Housing Land Supply (HLS) over the plan period should not be planned to a minimum with no flexibility to respond to changing circumstances. Therefore within the overall HLS sufficient headroom should be provided. The Council should apply any phasing proposals with caution so that sustainable development is not prevented from coming forward.

Q19. Do you have any views or suggestions for how planning policies could be better used to ensure that planned housing meets local needs?

The Local Plan Review should deliver new housing to meet the full range of local needs including affordable housing and specialist housing. The HBF recognise that all households should have access to different types of dwellings to meet their housing needs. When planning for an acceptable mix of dwellings types to meet people's housing needs the Council should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households such as self / custom builders and the elderly without seeking a specific housing mix on individual sites. Indeed the housing needs of older people is a diverse sector so the Local Plan should be ensuring that suitable sites are available for a wide range of developments across a wide choice of appropriate locations.

Q21. Please provide any views on how recent and proposed changes in national policy for housing (e.g. to promote starter homes, self-build homes and community-led housing) should be reflected in the Local Plan Review.

Policies HA1 to HA8 of the adopted Local Plan should be re-considered in the Review in order to reflect changes in national policy on housing. The Local Plan Review should also be prepared using new up to date and robust evidence.

It is agreed that new housing development should be designed to a high standard. However any new policy proposals for the adoption of optional higher housing standards should be fully justified by supporting evidence. This


evidence should be specific to local needs and not just generic. Optional higher housing standards should only be introduced in accordance with the criteria set out in the NPPG (ID 56-001 to 56-022).

The Council's affordable housing policy is out of date and the requirement for affordable housing provision on all sites is no longer consistent with site thresholds set out in the Written Ministerial Statement dated 28 November 2014. The definition of affordable housing should also accord with the latest definitions as set out in the NPPF. When the NPPF is revised in 2018 this may include tenures such as starter homes, discount market sale housing and affordable private rent housing.

Conclusion

It is hoped that these representations are of assistance to the Council in preparing the next stages of the Swindon Local Plan Review which to be found sound under the four tests of soundness as defined by the NPPF should be positively prepared, justified, effective and consistent with national policy. In the meantime if the Council requires any further assistance or information please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**



Susan E Green MRTPI
Planning Manager – Local Plans