



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

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Dear Sir / Madam

SWINDON & WILTSHIRE JOINT SPATIAL FRAMEWORK – ISSUES 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 consultation document. It is noted that simultaneous consultations are being held on the Swindon & Wiltshire Joint Spatial Framework, the Swindon Local Plan Review and the Wiltshire Local Plan Review it is the HBF's intention to submit separate representations to each respective consultation.

Q1. Do you agree with the proposed scope of the Swindon and Wiltshire Joint Spatial Framework?

It is proposed that the Joint Spatial Framework sets out in broad terms the quantum and spatial distribution of new jobs, homes and infrastructure in Swindon and Wiltshire for the period 2016 - 2036. The HBF is supportive of the principle of the Joint Spatial Framework to guide the overall pattern of development across Swindon and Wiltshire. However the proposed Joint Spatial Framework is a non-statutory document therefore it will not be subject to the same level of scrutiny and examination as a statutory Development Plan Document (DPD). This is both disappointing and concerning. Although joint statutory plans are not mandatory and the National Planning Policy Framework (NPPF) is not prescriptive about the ways in which Councils work together on strategic cross boundary matters there are advantages to a

statutory joint DPD including a transparent process, attribution of greater weight and more certainty. The Housing White Paper also advocates joint statutory plans stating “...we will also look to promote the alignment of decisions on infrastructure and housing at higher spatial levels, including through joint local planning and statutory spatial plans”. The HBF suggest that both Councils re-consider the status of the Swindon & Wiltshire Joint Spatial Framework and whether or not a statutory Joint Local Plan should be prepared.

The timing of the plan making process is also critical. It is noted that the preparation of the Joint Spatial Framework and the two Local Plan Reviews is concurrent (see Table 2.1 of the consultation document) therefore it is difficult to comprehend that the Framework is actually going to guide the respective Local Plan Reviews as set out. The Joint Spatial Framework should be completed before each respective Local Plan Review preferred options consultation.

The governance arrangements put in place to prepare the Joint Spatial Framework are also unclear as is the inter-relationship between the Joint Spatial Framework and the Wiltshire and Swindon Local Plan Reviews. Whilst the preparation of the Joint Spatial Framework demonstrates co-operation between Swindon and Wiltshire there should be a continuing dialogue with other neighbouring authorities concerning long term strategic cross boundary matters such as housing.

Q2. Do you agree with the proposed objectives for the Swindon and Wiltshire Joint Spatial Framework?

The proposed objectives should reflect the three dimensions of sustainable development and the twelve core planning principles as set out in the NPPF. There are five proposed objectives for the Joint Spatial Framework. The objectives of the Joint Spatial Framework and the Swindon and Wiltshire Local Plans should be consistent. Objective 1 proposes that each sub HMA meets its housing needs by a distribution that supports the role and function of settlements taking into account their functional relationships. The HBF have concerns about the reconciliation of Council administrative boundaries, defined HMAs and Local Plan areas in meeting objectively assessed housing needs (OAHN) (see answer to Q3). If Objective 1 is to be achieved then during the course of the respective Local Plan Reviews the existing settlement hierarchy may have to be re-considered and a more flexible approach to development in the rural areas implemented to accommodate the proposed quantum and distribution of housing set out in the Joint Spatial Framework. This should be reflected in Objective 3 – Resilient Communities. In Objective 2 – Economy there should be a cross reference to the objectives of the Swindon & Wiltshire Local Enterprise Partnership (LEP) Strategic Economic Plan (SEP).

Q3. Do you have any comments on the findings of the SHMA?

As set out in the NPPF both Councils should be proactively supporting sustainable development to deliver a significant boost to the supply of housing

to meet identified housing needs. Therefore using the most up to date and robust evidence base the Joint Spatial Framework should ensure that OAHN in full are met as far as is consistent with the NPPF including identifying key sites critical to the delivery of the housing strategy over the plan period. It is noted that the Joint Spatial Framework will not identify housing sites but broad locations for growth yet for employment needs strategic locations will be identified. The Councils should explain this inconsistency in approach. The absence of strategic housing locations creates uncertainty. As set out in the Housing White Paper both Councils should be planning for the right homes in the right places by making enough land available to meet assessed housing requirements.

The two adopted Local Plans set out a housing requirement of 3,567 dwellings per annum up to 2026.

The National Planning Practice Guidance (NPPG) advises that OAHN should be unconstrained (ID 2a-004) and assessed in relation to the relevant functional area known as the HMA (ID 2a-008). The Swindon & Wiltshire Strategic Housing Market Area Assessment (SHMA) Volume 1 dated June 2017 defines four sub Housing Market Areas (HMA) comprising of :-

- Swindon sub HMA including Marlborough, Royal Wootton Bassett & rural NE Wiltshire ;
- Chippenham sub HMA including Calne, Corsham, Devizes, Malmesbury & Melksham ;
- Trowbridge sub HMA including Bradford on Avon, Warminster & Westbury;
- Salisbury sub HMA (including Amesbury, Tidworth & Ludgershall).

It is noted that the boundaries of Swindon Council and the Swindon sub HMA do not coincide (see Figure 3.1 of the consultation document) it is unclear if the plan area of the new Swindon Local Plan will reconcile this difference. It is also unclear if unmet housing needs in one sub HMA will be met in another sub HMA. The Councils should provide clarity on these issues.

The NPPG methodology is a staged process comprising :-

- A demographic starting point based on past population change and Household Formation Rates (ID 2a-015 – 017) ;
- An economic assessment to accommodate and not jeopardise future job growth (ID 2a-018) ;
- Market signal indicators to counter-act worsening affordability caused by undersupply relative to demand (ID 2a-019 & 020) ;
- Affordable housing need is separately assessed (ID 2a-022 – 028) but the delivery of affordable housing can be a consideration for increasing planned housing provision (ID 2a-029).

The Swindon and Wiltshire SHMA 2017 identifies the projected need for market and affordable housing as 72,157 dwellings for the plan period 2016 – 2036. The OAHN calculation is summarised 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 in Swindon between 2011 – 14.

The proposed housing requirement of 73,000 dwellings is then 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 are in Chippenham sub HMA, 8,250 dwellings are in Salisbury sub HMA and 13,500 dwellings are in Trowbridge sub HMA.

The affordable housing need is estimated as a minimum of 23,053 dwellings (1,153 dwellings per annum) of which 31% is in Swindon and 37% is in Wiltshire.

At this time the HBF would criticise the Councils OAHN calculation for its modest market signals adjustments, 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 and Wiltshire should not be under-estimated. In the Housing White Paper the Government has also been critical of Councils which have not undertaken an honest assessment of housing needs. As a consequence the Government has consulted on proposals for a standard methodology for the calculation of OAHN. In summary the Government's proposed methodology is :-

- Demographic baseline based on annual average household growth over a 10 year period ;
- Workplace-based median house price to median earnings ratio ;
- Adjustment factor = $\frac{\text{Local affordability ratio} - 4}{4} \times 0.25$;
- Local Housing Need = (1 + adjustment factor) x projected household growth.

By the time of the Swindon and Wiltshire Local Plan Review Examinations it is likely that a standard methodology for the calculation of OAHN will have been implemented by the Government. The Councils should consider the implications of a standardised methodology for OAHN.

Q4. Do you have any comments on the findings of the FEMAA?

If the Joint Spatial Framework is to support economic growth across Swindon and Wiltshire then its strategies for housing and jobs should be consistent and integrated. The HBF would emphasise that any proposed lower housing requirement would not support the economic growth aspirations of the Swindon & Wiltshire LEP SEP.

Q6. The Housing Market Area Profiles present the current Plan's vision for each settlement based on its role and function. Do you think this should change?

The vision, objectives and settlement hierarchy of both the adopted Swindon and Wiltshire Local Plans should be re-examined during the review process in order to reflect the findings of the latest supporting evidence of the Joint Spatial Framework. This re-consideration should cover identified strategic issues together with specific development constraints and opportunities for each of the four sub HMAs.

Q10. Do you have any comments on the advantages or disadvantages of any of the following concepts for growth alone or in combination?

A plan led system should include contingencies therefore the 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. Currently there is a HLS of approximately 46,000 dwellings on existing site allocations and approved planning consents. So there is a minimum residual requirement (excluding any contingency) for circa 27,000 dwellings which is distributed across the four sub HMAs as :-

- Swindon sub HMA – 6,500 dwellings (housing requirement of 29,000 dwellings less 22,500 built or committed dwellings) ;
- Chippenham sub HMA – 13,250 dwellings (housing requirement of 22,250 dwellings less 9,000 built or committed dwellings) ;
- Salisbury sub HMA – 250 dwellings (housing requirement of 8,250 dwellings less 8,000 built or committed dwellings) ;
- Trowbridge sub HMA – 7,000 dwellings (housing requirement of 13,500 dwellings less 6,500 built or committed dwellings).

It is suggested that a combination of the proposed options (urban capacity, urban extension, transport based, rural settlements and new settlements) would deliver best on the objectives of the Joint Spatial Framework. However not all housing needs can be met on brownfield and infill sites so urban capacity alone will not be sufficient. It is also acknowledged that large strategic sites take a long time to develop. Therefore the strategy of the Joint Spatial Framework should facilitate the allocation of a broad portfolio of housing sites in the Swindon and Wiltshire Local Plans in order to maximise 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 so 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.

Conclusion

It is hoped that these representations are of assistance to Swindon Council and Wiltshire Council in preparing the next stages of the Swindon & Wiltshire Joint Spatial Framework. In the meantime if any further assistance or information is required please contact the undersigned.

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



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