



Spatial Planning
Economic Development & Planning
Wiltshire Council
County Hall
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SENT BY E-MAIL AND POST

19th December 2017

Dear Sir / Madam

WILTSHIRE LOCAL PLAN REVIEW 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 the questions in the Council's consultation document. It is noted that contemporaneous consultations are being held on the Swindon & Wiltshire Joint Spatial Framework and the Swindon Local Plan Review to which the HBF will also be submitting separate representations.

Q1. Do you agree with the proposed scope of the Wiltshire Local Plan Review?

It is agreed that the Wiltshire Local Plan Review should :-

- assess the future level of housing need for the period 2016 – 2036 ;
- assess if the adopted strategy remains relevant ;
- identify new site allocations for housing ;
- update development management policies for consistency with national policy.

In preparing the Local Plan Review housing should also be considered as an important cross-boundary issue (see answer to Q3 below).

Q2. Do you agree with the conclusions of the policy assessment set out in Appendix 2 and the proposed recommendations?

It is agreed that Policy PR42 (self build), Policy PR43 (affordable housing site thresholds) and Policy PR44 (optional higher housing standards) should be reviewed. The review of these policies should be based on new up to date and robust evidence. Any proposed changes should be fully justified and accord with the criteria set out in the National Planning Practice Guidance (NPPG).

Q3. Are there other planning policy issues that the Council should consider within the Local Plan Review? If so, what are they and why should they be included?

In preparing the 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 the Swindon & Wiltshire 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 this Joint Spatial Framework is a non-statutory document which will not be subject to the same scrutiny of a statutory 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.

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 therefore it is difficult to comprehend that the Framework is actually going to guide the Local Plan Review as envisaged.

Furthermore the inter-relationship between the Wiltshire Local Plan Review, the Swindon & Wiltshire Joint Spatial Framework and the Swindon Local Plan Review is not clear. The Swindon & Wiltshire Strategic Housing Market Area Assessment (SHMA) Volume 1 dated June 2017 defines four sub HMAs within the boundaries of Swindon and Wiltshire 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 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 Council should provide clarity on these issues.

As set out in the National Planning Policy Framework (NPPF) the Council should be proactively supporting sustainable development to deliver a

significant boost to the supply of housing to meet identified housing needs. Therefore the Council should use its evidence base to ensure that the Local Plan Review meets its objectively assessed housing needs (OAHN) in full as far as is consistent with the NPPF including identifying key sites critical to the delivery of the housing strategy over the plan period. As set out in the Housing White Paper the Council should be planning for the right homes in the right places by making enough land available to meet assessed housing requirements.

The adopted Wiltshire Local Plan sets out a housing requirement of at least 42,000 dwellings up to 2026. The new Local Plan will set out housing requirement for the 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).

The HBF would criticise the Council's OAHN calculation for the limited adjustments for market signals, no adjustment to support economic growth (with specific implications in the Salisbury sub HMA) and no uplift to the overall housing provision to assist in delivery of affordable housing. The OAHN for Wiltshire 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 Wiltshire 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.

Conclusion

It is hoped that these representations are of assistance to the Council in preparing the next stages of the Wiltshire 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