Dear Mr Cunningham,

Wiltshire Core Strategy (CS)

Further to my letter dated 27th June, I have now read the results of the recent consultation. In order to progress the Examination, a number of initial queries have arisen for which I would be grateful for your response.

Following my earlier correspondence including the 10th Procedural Letter, the Planning Practice Guidance (PPG) was published to which I must have regard. I note the Council’s recent statement on the subject and other responses received as part of the consultation.

As you will be aware, the PPG provides further guidance on the content of the National Planning Policy Framework. In particular it provides useful information relating to how housing needs should be assessed. In this context, I am conscious that, to inform its housing figures within the Core Strategy, the Council relies upon a range of evidence sources. In terms of its SHMA, the Council is particularly reliant upon the Fordham work and Topic Paper 15 (as amended) which, individually and understandably, do not specifically follow the methodology outlined in the PPG.

Given the recent publication of the PPG and the time that has elapsed since the initial housing evidence was gathered, could the Council clarify at what point in the future it intends to review the objectively assessed housing needs of the county through a process informed from its outset by the content of the PPG? I am most interested as to whether any planned update/new SHMA should be referenced within the Core Strategy to provide clarity on the way in which the Council will ensure the effectiveness of its policy approach to meeting housing needs.
Furthermore, could the Council clarify how it believes it has considered ‘market signals’ within its earlier evidence?

In addition, and whilst I have noted the content of the updated LDS, could the Council explain how and when it intends expressly to plan for the period beyond 2026?

With regards to the 900 homes already planned within Wiltshire but identified to meet the needs generated within the Borough of Swindon, can the Council clarify why it considers these should form part of the minimum 42,000 new homes now contained within the modified Wiltshire Core Strategy? With regards to the comments made to the recent consultation, there appears to be some logic to an argument that states such homes should not be counted against the minimum proposed requirement for Wiltshire of 42,000 homes over the plan period.

In relation to the Housing Land Supply Statement, can the Council provide a current version (ie July 2014) including any adjustments to be made for recent appeal decisions (eg Malmesbury) and, if necessary, for the land serving Swindon? Can the Council summarise, based on existing evidence, how its intended housing provision will meet the requirements of paragraph 47 of the Framework? I am particularly interested in the land supply for years 1-5 (2014 onwards) and 6-10 and the extent to which the shorter term supply of land is capable of meeting identified needs. Any clarification of the evidence in light of the PPG section entitled Housing and economic land availability assessment and including Stage 5 would be appreciated. An expansion and update to Table 3 of the Housing Land Supply Statement of April 2014, to show both time periods, may be helpful.

As a separate matter and as referenced within the consultation report (EXAM/103), can you please provide a copy of the Memorandum of Understanding which appears to be in the process of being agreed with Natural England?

I look forward to hearing from you shortly and within 10 days.

Yours sincerely,

Andrew Seaman

Senior Housing and Planning Inspector

1 Website paragraphs reference ID: 3-028-20140306 onwards