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8 January 2007

Dear Peter

**RSS Examination in Public Preparation: Section 4(4) Advice
Implications of DCLG 2003 Revised Household Projections**

Further to your letter of 13 October 2006, please find enclosed a copy of Wiltshire County Council's formal response to the request for advice on the above. It should be noted that it has not been possible to fully engage with Members and as such this is only an Officer response.

As you will see from the conclusion of the report, Wiltshire County Council considers that it would be more appropriate to reassess the housing figures as a whole through a partial review of the revised RSS. In the interim period, it is suggested that if there are concerns of insufficient housing levels, the phasing could be amended in the early years of the plan prior to a review taking place.

There is no overall preferred Scenario for Wiltshire and no consideration has been given to what an alternative scenario could be given that there was no requirement in the brief to do so. However, I would be happy to provide further advice if you wish a preferred approach for Wiltshire to be considered.

Yours sincerely

W D Rapley
Group Manager
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WILTSHIRE COUNTY COUNCIL SECTION 4(4) ADVICE (JANUARY 2007): IMPLICATIONS OF DCLG 2003 REVISED HOUSEHOLD PROJECTIONS

1. Introduction

- 1.1 Following formal submission of the Draft Regional Spatial Strategy (RSS) for the South West, the Secretary of State for Communities and Local Government requested that the South West Regional Assembly (SWRA) undertake further work before the start of the Examination in Public of the RSS on the implications of revised Government household projections for England. The revised projections indicate that a higher level of housing will be needed across the region to meet the needs of the population. This is due to changed assumptions resulting in increases in household representation rates.
- 1.2 The SWRA formally requested the advice of Wiltshire County Council as a Section 4(4) authority on the implications of the revised forecasts on 13 October 2006. The Brief requested that the social, economic and environmental implications for Wiltshire and its communities of providing additional dwellings to meet the revised household projections be assessed according to four scenarios, as follows:
- Scenario 1: An increase pro-rata to the distribution in RSS of Table 4.1
 - Scenario 2: Additional development is concentrated at the 21 Strategically Significant Towns and Cities (SSCTs) pro rata to RSS Table 4.2
 - Scenario 3: Additional development is distributed to all areas except the Strategically Significant Towns and Cities pro rata to RSS Table 4.1 minus Table 4.2
 - Scenario 4: Strategic 'best fit' scenario taking account of Draft RSS strategy influences
- 1.3 The additional dwellings required as a result of each Scenario are shown in Table 1 below. Swindon is shown for illustrative purposes only. Given that only District figures were provided for Scenario 4, this has been distributed to the SSCTs and areas outside the SSCTs pro rata to Draft RSS Tables 4.1 and 4.2.

2. Consultation

- 2.1 The County Council has sought to consult with the District Councils in preparing its advice. An initial meeting was held with Officers of the District Councils on 13th November 2006 to discuss Scenarios 1 to 3. On receipt of Scenario 4, a further round of consultation was undertaken via email and the opportunity for further discussion provided at a meeting held on 13th December 2006. Finally, where possible Officers have provided comment on the draft advice before its submission. Given the time constraints due to the late receipt of Scenario 4 it has not been possible to fully engage all Members at the County or District level. As such, this report provides an Officer response with some Member input. At Kennet District Council, Members have been able to consider the implications of the Scenarios.
- 2.2 Kennet District Council's Planning Policy Executive Committee resolved that a reduction in the current housing requirement for Kennet District should be sought in the light of excluding windfall development as a contribution to future supply. Paragraph 9.5 set out below clarifies the concern about windfall development. In

addition, the Committee resolved that any additional housing required as a result of revised household projections should be accommodated in the SSCT's and not in the rural parts of the County.

SSCT	No. of Additional Dwellings (Net)			
	Scenario 1	Scenario 2	Scenario 3	Scenario 4
Chippenham	976	1488	0	981
Salisbury	1084	1653	0	1630
Trowbridge	1084	1653	0	1481
<i>Swindon excluding part in NWDC</i>	<i>7155</i>	<i>10909</i>	<i>0</i>	<i>5889</i>
Adjoining Swindon within North Wiltshire	217	331	0	218
<i>Total Swindon</i>	<i>7372</i>	<i>11240</i>	<i>0</i>	<i>6107</i>
District (excl. SSCTs)				
Kennet	1084	0	3151	1300
North Wiltshire (excl. Chippenham & part at Swindon)	976	0	2836	981
Salisbury (excl. Salisbury)	911	0	2647	1380
West Wiltshire (excl. Trowbridge)	1193	0	3466	1637

Table 1: Difference between Draft RSS Housing Requirements for Wiltshire and Scenarios for Distributing Higher Housing Growth

3. Settlement Pattern

- 3.1 In order to be able to consider what the implications are for the additional housing produced by the scenarios some consideration has to be given to the potential of the County to distribute growth in a sustainable way. Recent Structure Plan policies have focused growth towards the County's towns and main settlements. These settlements are generally considered to have the greatest potential to accommodate housing growth in a sustainable way by providing access to jobs and services. In accordance with the Draft RSS current spatial strategy it is anticipated that these will continue to be the main focus for housing growth. Although it is recognised that, in line with the strategy set out in Development Policies A, B and C of the Draft RSS, the relative degree to which each settlement will provide for future growth may differ from the past.
- 3.2 The Draft RSS identifies an enhanced role for three of the County's towns and main settlements - Chippenham, Salisbury and Trowbridge - and defines them as Strategically Significant Cities and Towns (SSCTs) with specific levels of housing growth. As the largest settlements in the County, they offer higher level services and facilities, concentrations of employment activity, have the best economic potential and therefore provide significant opportunity to deliver sustainable housing growth. The other main towns and settlements are as follows (population sizes taken from Wiltshire County Council publication, 'Population Estimates for Wiltshire 2005', are shown in brackets):

- Kennet District: Devizes (15,710), Marlborough (7,960), Pewsey (3,320), Ludgershall (4,450) and Tidworth (8,450; Armed Forces and dependents form majority of population)
- North Wiltshire: Calne (15,680), Corsham (8,650), Malmesbury (5,210), Wootton Bassett (11,120) and Cricklade (4,110)
- Salisbury: Amesbury (9,340), Durrington (4,530), Downton (2,640), Mere (2,490), Tisbury (2,130) and Wilton (3,870)
- West Wiltshire: Bradford-on-Avon (9,490), Melksham (19,380), Warminster (17,740) and Westbury (13,440)

The remainder of the County is more rural in nature generally characterised by smaller villages with limited employment, services and facilities, and open countryside.

- 3.3 The populations of the main settlements show that there are only a limited number of settlements of any significant size in the County. This indicates that there is a limit to the amount of growth that can be accommodated in a sustainable way.
- 3.4 In addition, in line with the strategy of the Draft RSS particular settlements in North Wiltshire District (Cricklade and Wootton Bassett) are not appropriate for growth over and above local needs due to the consideration in RSS that they perform largely a dormitory function to Swindon (paragraph 4.2.30). However, it is recognised that a change in policy position would allow these settlements to accommodate more strategic levels of growth. The Draft RSS also recognises that these settlements are at risk from coalescence with Swindon and requires strategic gaps to be maintained further limiting their potential for expansion. A further policy constraint to development is the Western Wiltshire Green Belt that extends into North and West Wiltshire Districts. This is the outer part of the green belt where the release of land is not proposed by the RSS to accommodate growth. Bradford on Avon in West Wiltshire District is situated within the Green Belt.
- 3.5 Also, a number of the County's main towns and settlements have environmental constraints limiting their ability to accommodate growth. These are outlined below together with an overview of the economic, social and transportation implications of additional growth.

4. Environmental Implications

- 4.1 For all Scenarios the additional housing as set down in Table 1 will need to be provided on greenfield sites and in accordance with the Draft RSS should be on the edge of existing settlements if sites are not available within the existing urban areas.
- 4.2 Wiltshire contains a number of Areas of Outstanding Natural Beauty (AONB) - the Cotswolds AONB, the Cranborne Chase and West Wiltshire Downs AONB and the North Wessex Downs AONB - presenting constraints to development. Kennet District in particular is constrained with two of its main settlements (Marlborough and Pewsey) located within an AONB. Malmesbury located in North Wiltshire is situated adjacent to the Cotswold AONB.
- 4.3 The Wiltshire and Swindon Structure Plan 2016 identifies a number of the towns and main settlements as historic towns with important landscape settings that should not

be adversely affected by development. These are Salisbury and Wilton in Salisbury District, Devizes and Marlborough in Kennet District, Bradford on Avon and Warminster in West Wiltshire District, and Wootton Bassett and Malmesbury in North Wiltshire District.

- 4.4 A number of the settlements are also affected by river corridors and floodplains, as well as important wildlife sites and archaeology. In particular, the River Avon system converging on Salisbury is designated as a Special Area of Conservation (SAC).

5. Economic Implications

- 5.1 It has not been possible to give any consideration as to whether the additional housing would promote a balance between the resident workforce and employment growth. This is due to insufficient data being made available. Firstly, employment projections supplied by the SWRA only relate to Housing Market Areas and no breakdown has been provided at the District level to help inform this work. Secondly, neither has the SWRA supplied District level population projections, which (broken down by age-sex cohorts) would be required to derive workforce projections. It has not therefore been possible to determine whether the economic prospects for each District broadly aligns with the dwelling totals in Scenarios 1 to 4.

6. Social Implications

- 6.1 All Housing Needs Assessments across the County indicate significant demand for affordable housing. The current main delivery vehicle for the provision of affordable housing in Wiltshire is through on site provision on new market housing developments. Given that the additional growth proposed under the Scenarios is all likely to take place on Greenfield sites, the additional growth should have positive implications for the delivery of affordable housing, particularly in the rural areas where due to the strategy of the Draft RSS housing is more limited.
- 6.2 As recognised in the RSS (paragraph 3.6.2) access to health, education, cultural facilities, social services, shops and jobs is an important factor in promoting social inclusion. The delivery of services and facilities to a larger number of households will have financial implications for providers. Financial resources are limited and in order to work towards maintaining and improving accessibility housing growth needs to be managed carefully.
- 6.3 In a rural County such as Wiltshire, concentrating housing growth in a smaller number of settlements is likely to be more effective in terms of service delivery and cost of provision. In addition housing growth within fewer locations is more likely to help support existing facilities, improve access by public transport and may encourage the provision of improved or new facilities due to higher populations. Strategic growth in particular may also enable deficits in current provision to be addressed through developer contributions.

7. Transportation Implications

- 7.1 It has not been possible to assess the implications of the additional growth using a transportation model due to the timing of the study. Progress is being made in undertaking future modelling of settlements, in particular the SSCTS, to inform Local Development Frameworks.

8. Housing Growth Scenarios

- 8.1 A summary of the implications of each Scenario is set out below drawing upon Sections 3 to 7 above as appropriate.

Scenario 1: Increase pro-rata to distribution in Draft RSS Table 4.1 for South West Region

- 8.2 At both the district and sub-district levels, housing growth will be 22% above Draft RSS levels, an increase of 7,525 dwellings overall. Each SSCT will need to provide approximately 1,000 additional dwellings. Chippenham and Trowbridge are relatively unconstrained and could accommodate this level of additional housing growth without any significant impact. While Salisbury has significant environmental constraints in terms of its landscape setting, internationally important wildlife sites, flooding, archaeological and built heritage there is likely to be potential to accommodate a level of additional growth just short of that set out in this Scenario without compromising its environmental quality. The increase for the part of the Swindon SSCT in North Wiltshire is relatively small and could be accommodated while ensuring that strategic gaps can be maintained between Swindon and outlying settlements in North Wiltshire District.
- 8.3 Scenario 1 will also mean an increase of between approximately 900 and 1200 additional dwellings for each of the areas outside the SSCTs. Taking into account sustainability considerations, the nature of settlements within these areas together with recent and planned growth, the Draft RSS figures are considered to provide a reasonable level of housing growth outside of the SSCTs. Above this there is the concern that unsustainable development would occur, leading to increased car journeys to access jobs and services. In addition, there is concern that this level of additional development could result in unacceptable harm to the environment. This is particularly the case for Kennet and Salisbury Districts.
- 8.4 Notwithstanding the above, it is recognised that subject to the household forecasts being reasonable, the additional housing proposed by Scenario 1 outside the SSCTs will help meet the housing needs of the local population in terms of overall numbers of provision. In addition, this could have a positive effect on providing a workforce to promote employment growth in the rural areas. However, as it has not been possible to consider workforce and employment change, the implication for the potential of improving the balance between where people live and work at the district level is unclear.

Scenario 2: Distribute additional growth to SSCTs pro-rata to Draft RSS Table 4.2

- 8.5 Scenario 2 will mean that the number of dwellings at each SSCT will increase by one third, while the distributions for the remainder of the County will remain at the Draft RSS levels. However, this Scenario represents the lowest level of additional housing growth proposed for the County (5,125 dwellings).
- 8.6 Compared with Scenario 1, this represents a further increase of around 500 dwellings for each of the SSCTs. For Chippenham and Trowbridge, this increase is not so significant to alter the findings under Scenario 1. However, the environmental impact of any additional development over and above that proposed in Scenario 1 at Salisbury is unknown and it is considered likely that the environment would be at risk. The degree to which any impact could be satisfactorily mitigated is uncertain without detailed study. The additional growth at the Swindon SSCT within North Wiltshire,

although higher than Scenario 1, is not considered to be so significant to alter the findings under paragraph 8.2.

- 8.7 Scenario 2 will mean no additional housing growth within the area outside of the SSCTs. As stated in paragraph 8.3, the Draft RSS figures are considered to provide a reasonable level of housing growth outside of the SSCTs. Accordingly, unlike Scenario 1, there are no concerns of unsustainable development and environmental harm for the area outside of the SSCTs for this Scenario.
- 8.8 In light of the new household forecasts, no additional housing is likely to exacerbate the housing need situation outside of the SSCTs by further constraining the supply of housing. The ability to deliver affordable housing will be reduced compared to the other Scenarios. This could also have negative effects on limiting the labour force in the rural area restricting employment growth and prospects of existing employers. It could lead to commuting into the rural areas. However, without information on the balance between workforce and employment it is difficult to determine the degree to which this would occur.

Scenario 3: Distribute additional growth to areas outside of the SSCTs pro-rata to Draft RSS Table 4.2 minus SSCT elements

- 8.9 Scenario 3 means that the number of dwellings planned at Kennet and the other Districts outside of the SSCTs would increase by almost two thirds, with the County total increasing by 12,100 dwellings over the plan period. This is the highest increase out of all Scenarios and is considered to significantly undermine the strategy of the Draft RSS, placing significant additional pressure on the more rural parts of the Region to provide housing growth. There is concern that Wiltshire would not be able to accommodate this additional level of growth outside the SSCTs without seriously compromising environmental and sustainability objectives.
- 8.10 Given that the greatest potential for job growth is within the travel to work areas of the SSCTs (paragraph 4.5.2, Draft RSS), it is likely that Scenario 3 would only serve to increase car borne commuting in the rural areas. This more dispersed distribution could also lead to more car journeys to access services. The findings under paragraph 8.4 also apply to this Scenario, although in light of the higher levels of housing there is likely to be a more negative implication for the balance between where people live and work.

Scenario 4: Strategic 'best fit' scenario taking account of Draft RSS strategy influences

- 8.11 The actual number of additional dwellings proposed by Scenario 4 is about 9,600 dwellings for Wiltshire as a whole and higher than Scenario 1. The Scenario will result in the total number of dwellings planned at Kennet increasing by 26%, North Wiltshire by 22%, Salisbury by 33% and West Wiltshire by 30%.
- 8.12 The derivation of Scenario 4 is complex and it is unclear whether it provides a fair policy steer.
- 8.13 For Salisbury SSCT, the additional growth is similar to that proposed under Scenario 2. As such, there is real concern that the environment would be at risk from the growth proposed under this Scenario. For Trowbridge and Chippenham SSCTs, the level of growth is lower than Scenario 2. As discussed under Scenario 2 there are no real concerns in terms of accommodating this level of growth. For the North Wiltshire

part of the Swindon SSCT the additional growth is similar to that proposed under Scenario 1. There is therefore no concern about accommodating this level of growth.

- 8.14 For the areas outside the SSCTs, with the exception of North Wiltshire, the levels are higher than Scenario 1 but lower than Scenario 3. The concern expressed under Scenario 1 about increasing car travel and less sustainable rural development is therefore particularly relevant. The recognition in paragraph 8.4 that, subject to the household projections being reasonable, the additional housing outside the SSCTs will help meet the housing needs of the local population in terms of overall numbers of provision also applies to this Scenario. Although the extent to which the balance between where people live and work can or can not be improved still remains unclear.

9. Conclusion

- 9.1 It has not been possible to fully assess the 2003-based household projections and the degree to which they should be used to inform the revised RSS figures. As the projections represent a significant shift from those underlying the Draft RSS figures, their use should be carefully scrutinised. Furthermore, it is important to recognise that the 2003 based ONS population projections, on which these latest household projections are based, have now been superseded by 2004 based population projections. On the basis of these more recent population projections, the scale of population increase anticipated in Wiltshire over the period 2006 to 2026 is lower than that contained in the 2003 based projections. This is in itself significant but also underlines the important general point that no projection is set in stone. In view of the substantial differences between the 2003 based household projections and the earlier household projections, and in view of the implications of the 2004 based population projections, the County Council may wish to make more detailed comments on the use of the projections in due course.
- 9.2 As a general point, the County Council is concerned that at this stage of the RSS process (following formal consultation stages) the projections are being used to put forward increases to the draft housing figures. The simplistic way in which the additional housing is being distributed through Scenarios 1 to 3 is questioned given the level of work undertaken to inform the Draft RSS. Although Scenario 4 is more complex, its adequacy is also questioned. It would be more appropriate to reassess the housing figures as a whole through a partial review of the revised RSS in due course once the implications of the projections are fully understood. If there are concerns about insufficient housing levels, phasing could be amended in the early years of the plan prior to a review being undertaken.
- 9.3 In the timescales provided, it has not been possible to properly assess the implications of Scenarios 1 to 4, in particular the relationship between workforce and employment changes. It is possible that the higher levels of housing now proposed may make the overall strategy of the Draft RSS undeliverable and there may be the need to reconsider the plan's strategy in order to accommodate the level of growth sought under the household projections in a sustainable way. What this report does highlight is the probability that there is unlikely to be a one size fits all scenario that will be appropriate for all the Districts in Wiltshire. From the perspectives of each authority at Officer and/or Member level the following summarises the views expressed through consultation:
- Kennet District Council considers that any additional growth should be focussed towards the SSCTs in line with Scenario 2.

- North Wiltshire District Council considers that additional growth should be concentrated towards Chippenham and that further potential also exists for growth at some settlements outside of the SSCTs. In this respect, Scenarios 1 and 4 can be supported.
- Salisbury District Council considers that Scenarios 2 and 4 cannot be supported due to the high levels of additional growth proposed at the Salisbury SSCT. Neither can Scenario 3 due to the opposing direction that it takes to the Draft RSS strategy and unsustainable levels of additional growth that would be required in the rural area. Although Scenario 1 appears to provide the best fit for Salisbury District there is still fundamental concerns about meeting the additional levels of growth stated. In order to minimise environmental harm and unsustainable levels of rural development the additional levels of growth for Salisbury SSCT and the remainder of the District set out in Scenario 1 should be reduced.
- West Wiltshire District Council considers that of the additional growth scenarios considered, Scenario 2 provides the only Scenario likely to deliver sustainable development and minimise environmental impact. However, a small increase in housing levels for the rest of the District outside of Trowbridge (lower than those proposed in Scenarios 1, 3 or 4) may be acceptable given the pressing housing needs.

9.4 There is potentially a key issue and dilemma for Wiltshire that cannot be fully examined within the timescales for the preparation of this advice. This is the implication of the projections and balancing the need to provide housing where the need is generated with the overall Strategy of the Draft RSS. An initial (albeit simplistic) examination of the projections indicates that Wiltshire could require significant levels of additional housing growth over the Draft RSS figures, potentially above that proposed under any Scenario, if locally generated needs are to be met.

9.5 Another issue, raised through consultation, relates to windfall. In response to the publication of Planning Policy Statement 3 (PPS3) Housing and this request for advice on additional levels of housing, concern has been expressed about the impact new windfall development will have on the delivery of the RSS housing requirement. As PPS3 discourages windfalls being taken into account in the first 10 years of housing land supply there is concern that there will be an over provision of housing, particularly in rural Districts where windfall has historically taken up a large proportion of supply. Clearly over provision could undermine the strategy of providing for sustainable levels of growth. Although it is recognised that this will be an issue for managing supply, the Draft RSS only addresses the issue of shortfall (paragraph 4.5.6) and does not acknowledge the action that should be taken if oversupply emerges.

