



**Wiltshire Council
Local Development Framework**

**SOUTH WILTSHIRE CORE STRATEGY
DEVELOPMENT PLAN DOCUMENT REVIEW**

Examination

**Position Statement for Matter 7: Rural Areas and
Neighbourhood Plans**

July 2011

Contents

Matter 7, questions to be considered	Page No.
Question 7.0: Is sufficient provision made for housing development in the rural area?	4
Question 7.1: How would development proposed as part of Neighbourhood Plans and Community Right to Build Schemes be accommodated?	6

Matter 7 Question 7.0: Is sufficient provision made for housing development in the rural area?

- 1.0 The focussed changes as a result of the review suggest a supply of just below 4000 homes in the rural areas. This represents a reduction of some 2560 from the Panel Report into the draft Regional Spatial Strategy for the South West which was taken forward into the Secretary of State's Proposed Changes (dSWRSS), although less than 400 from the first draft RSS. The weight and status which may be afforded to the dSWRSS and the issue of consistency is discussed in the Council's proof to Matter 1.
- 1.1 The Council consider that the plan with focussed changes strikes an effective balance and achieves the sufficient supply of homes in the rural areas while also allowing the flexibility to be able to adapt to the potential outcomes of the Localism Bill. This is explained in the following paragraphs.
- 1.2 Firstly it should be emphasised that the Council has consistently maintained that the dSWRSS does not adequately reflect the dominance of Salisbury as a sustainable location, and has maintained a consistent stance with regard to the proportion of growth that should be located around the City and in the rural areas. With the exception of Amesbury, the main settlements (local service centres) outside of Salisbury are in reality large villages, set in a rural area. Their capacity to absorb growth in a sustainable manner is limited, and this is also a relevant factor in considering an appropriate level of growth for the rural areas. The Table in Matter 1 shows how the ratio proposed by the Council has consistently been in the region of 60% to Salisbury and 40% outside, compared to the dSWRSS figures of roughly 50:50. This is a reflection of the primacy of Salisbury as a sustainable location as indicated through the SA/SEA process and detailed assessment of local evidence, especially in the formulation of the sustainable settlement strategy. This also reflects the highly constrained nature of the rural areas in South Wiltshire (with constraints including the Area of Outstanding Natural Beauty, the World Heritage Site, and European protected nature sites). It should be noted that the dSWRSS with Secretary of State Proposed Changes was not subject to the full SA process and thus far has failed to demonstrate how alternative options for growth have been adequately considered to best reflect the characteristics of the area.
- 1.3 The review has given the Council an opportunity to take account of up to date evidence. This draws on the advice of the CLG Chief Planning Officer advice to Councils.¹ The evidence related to the projected housing and employment figures and presented to support the SWCS review² is more up to date than that used for the dSWRSS. The latter was based on housing figures identified in 2003 ONS projections³, whilst the former is based on the 2008 sub national population projections, also from the ONS. The new evidence, as set out by the Council, has helped complement and clarify that of the dSWRSS and suggested a justified

¹ See letter of 6th July 2010 to Councils from Steve Quartermain, Chief Planner CLG, especially paragraphs 10, 11 and 12 of the appendices.

² See EIP document COM/02B, Housing Technical Paper, Cabinet of Wiltshire Council 19.10.10.

³ See SWRSS Panel Note A to the EIP.

reduction in the rural areas outside of Salisbury. However the consideration of new and up to date evidence, while material to making a balanced judgement, has been used prudently to ensure that the SWCS remains consistent with the aims of the dSWRSS (i.e. that of frontloading growth around Salisbury to deliver a step change in housing growth, while focussing new homes outside of the urban area, predominantly to the larger villages which comprise local service centres and represent the more sustainable options).

- 1.4 A further consideration is that the feedback received from all stages of consultation, throughout the production process, including the latest stage on the SWCS Review, has highlighted that the communities have indicated that they consider the level of new homes to be accommodated within the rural areas to be too high. This issue has been accentuated by Government announcements in advance of the Localism Bill becoming legislation, and has increased public expectation about the influence of communities in determining these matters. While in the context of the latest Cala Homes ruling, it is clear that consistency with the dSWRSS is important, it would be wrong to set aside the impact of the Government's agenda on the local communities and their representatives. As such the opportunity of the review and the up to date evidence that has been identified, has allowed the Council to take pragmatic and responsible actions to ensure that the ambitious growth strategy (and hence consistency with the dSWRSS) is maintained, while also responding positively to the views of the communities themselves. The Council believes that the focussed changes to the SWCS achieve this balance well.
- 1.5 Another consideration is that of ensuring that the SWCS is forward looking and can adapt to forthcoming changes to the planning system. It is of course impossible to predict all of the possible changes that may happen and hence it is essential to ensure that the strategy is flexible. During the Spring of 2011, the Council gave a series of seminars to all Community Areas within Wiltshire, this included discussion about Neighbourhood Planning. During these events many communities expressed the desire to embrace Neighbourhood Planning to deliver homes in their area. This was especially so in the rural areas. It would be wrong to prejudge how this may deliver homes until the parliamentary process is complete, but it does have the potential to deliver additional homes in the rural areas, above those identified within the SWCS, if it comes to fruition. What this highlights is the need for the SWCS to plan ahead and set the flexible framework to allow neighbourhood planning (or whatever alternative shape the future of planning may take), and hence the need not to be over prescriptive in the rural areas given the current uncertainties.
- 1.6 The level of housing proposed for the rural areas could therefore be considered a floor not a ceiling. The delivery of the amount shown in the focussed changes would allow significant progress to be made to meet local needs in a sustainable manner, and also affords the opportunity for communities to deliver further numbers through their neighbourhood plans where they so wish.
- 1.7 Historic trends show that an average of around 55 dwellings per year have been provided outside of Salisbury, Wilton and Amesbury on small windfall sites (brownfield sites of under 10 dwellings)⁴. These historic windfall rates may continue and hence could continue to be an important source of new homes in the rural areas

⁴ See paragraph 9.18 of Topic Paper 20, Review

that could complement Neighbourhood Plans. Windfall development is unpredictable by nature, and this cements the need for the plan to be flexible and set a realistic floor for development. The unpredictability over the numbers from this source is another reason to take the pragmatic approach of not being over prescriptive in the first instance.

- 1.8 Finally the Council has consistently argued at EIP that the dSWRSS was in the region of 1000 homes too many in the rural areas (see Matter 1 statement, para 1.2 – CD/01). This point has been robustly made at the EIP and is a matter for the Inspector to decide upon.
- 1.9 The evidence indicates that the SWCS incorporating the focussed changes is consistent with the dSWRSS and strikes an effective balance which protects the main strategy being pursued in the document and importantly is flexible to future circumstances.

Question 7.1: How would development proposed as part of Neighbourhood Plans and Community Right to Build Schemes be accommodated?

- 1.10 Paragraph 2.6 of the Review document⁵ sets out the Councils position regarding the Localism Bill. While the proposed Bill is undergoing its parliamentary process there is uncertainty over how it may end up, and hence the need for flexibility and pragmatism. As stated in paragraph 2.8, the review has been conducted in the spirit of localism, especially with regard to a closer assessment of the consultation responses made and the need to achieve a plan that allows communities to take their own decision over the amount and timing of homes and jobs.
- 1.11 The SWCS incorporating focussed changes has been designed to provide a flexible framework for any future Neighbourhood Plans or Community Right to Build Schemes which may come forward. The levels of housing and employment growth proposed in the SWCS are the minimum levels of development which are expected to come forward, and do not act as a 'ceiling'. It is anticipated that any Neighbourhood Plans will need to comply with the SWCS by contributing to the delivery of the minimum levels of development identified, but that Neighbourhood Plans and Community Right to Build Schemes will also be able to exceed the housing and employment numbers set out in the SWCS⁶. The decision on the level of development for each area is thus handed to the local community. The reduction in the total number of houses proposed in the rural areas in the focussed changes to the SWCS (from 5,070 in the SWCS Submission Draft to 3,840 in the SWCS Review) therefore increases the flexibility of the plan, and offers local communities more opportunity to influence the level of development in their areas.

⁵ Topic paper 20, Review

⁶ See draft 'Local Planning for Sustainable Development' speech by the Rt Hon Greg Clark MP, 10 February 2011 (NPP/45 E)

- 1.12 As explained in paragraph 1.4 above, communities have indicated that they consider the level of new homes to be accommodated within the rural areas to be too high. However, one of the issues that emerged through pre-submission consultation was that the local communities were keen to ensure some growth within the smaller rural settlements⁷. The SWCS Review seeks to achieve a balanced approach, by reducing the overall ‘minimum’ number of dwellings to be provided in the rural areas (outside Salisbury) but allowing additional growth, over and above this ‘minimum’, to come forward through community led Neighbourhood Plans and Community Right to Build Schemes. The SWCS Review is therefore able to take greater consideration of the wishes of the local communities, as indicated through the consultation processes.
- 1.13 The Council will monitor rates of delivery of housing in the rural areas through the Annual Monitoring Report (AMR) or successor. If the AMR shows that delivery rates are too low (for example because Neighbourhood Plans or Community Right to Build Schemes are not coming forward), then the Council will consider an appropriate response to this, such as the preparation of a site allocations development plan document (DPD).
- 1.14 It is also worth noting that the Council is currently reviewing its planning policy approach to the rural areas through the emerging Wiltshire-wide Core Strategy. The SWCS will form a part of the Wiltshire-wide Core Strategy once the latter document is adopted. Current proposals in the Wiltshire Core Strategy Consultation Document⁸ identify ‘Local Service Centres’, ‘Larger Villages’ and ‘Smaller Villages’ across Wiltshire, excluding the South Wiltshire area. The Consultation Document suggests a move towards a criteria based approach for development in these smaller settlements. It proposes that in Local Service Centres and Larger Villages some development could take place outside the settlement boundaries, and that in the case of larger developments such sites (outside the settlement boundaries) will need to be identified through either a community led Neighbourhood Plan or a Site Allocations DPD. The Consultation Document also sets out criteria to be met by development at Local Service Centres and Larger Villages. In the case of Smaller Villages, it proposes that settlement boundaries should be removed, with specific criteria applying to development in these settlements instead. The emerging proposals for the Wiltshire-wide Core Strategy therefore seek to provide a flexible framework within which Neighbourhood Plans and Community Right to Build Schemes can come forward, thus enabling communities to identify suitable sites for additional growth if there is an aspiration to do so.

Conclusion

- 1.15 In conclusion, the SWCS Review makes provision for a sufficient supply of homes in the rural area, whilst also providing flexibility to enable further development to come forward through community led Neighbourhood Plans or Community Right to Build Schemes. The provision for homes in the rural area identified in the SWCS review has been developed based on up to date evidence and also responds positively to community views, as expressed through consultation processes.

⁷ See paragraph 9.15 of Topic Paper 20, Review

⁸ See pp. 24-25 of the Wiltshire Core Strategy Consultation Document June 2011