

**WILTSHIRE COUNCIL  
LOCAL DEVELOPMENT FRAMEWORK**

**SOUTH WILTSHIRE CORE STRATEGY  
EXAMINATION IN PUBLIC**

**MATTER 9: CORE POLICIES  
6, 10, 11, 14, 16 & 17  
HOUSING NEEDS**

**ON BEHALF OF  
PERSIMMON HOMES AND  
THE WILTON ESTATE**

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## Q9.1

*Core Policies 6, 10, 11, 14, 16 and 17 set out in some detail the size and type of affordable housing and the size of private sector housing that will be needed for the various community areas. What is the evidence base for these policies?*

- 9.1.1 Persimmon and Wilton generally support the South Wiltshire Core Strategy and note its overall soundness. However, further minor changes to the CS are sought to improve its effectiveness, consistency with national policy and for clarification/updating purposes.
- 9.1.2 Persimmon Homes and the Wilton Estate note that Core Policies 6, 10, 11, 14, 16 and 17 set out in some detail the size and type of affordable housing and the size of private sector housing that will be needed for the various community areas.
- 9.1.3 The Evidence Base for these policies is principally set out in the DCA Housing Need Assessment Appendix 1 (2006)<sup>1</sup>. Tables 1 and 2 summarise by Community Area the quantitative and percentage requirements for dwelling size and tenure, derived from the DCA findings for each Community area (see Response to Matter 1). This information provides the basis for the tenure split and percentages set out in Core Policies 6, 10, 11, 14, 16 and 17. This evidence is supported but will soon be superceded by new information.
- 9.1.4 In line with PPS3<sup>2</sup>, Persimmon and Wilton consider that the size and type of affordable housing and the size of private sector housing, appropriate for a particular scheme, should be determined through negotiation, having regard to available and 'up to date' local evidence. However, such negotiations also need to be guided and informed by financial viability test considerations and the role of new development relative to the 'second hand' housing market. It is unclear from the CS whether it was intended that all development proposals in a given community area should deliver the precise tenure and dwelling split set out in Core Policies 6, 10, 11, 14, 16 and 17 or if the proposed tenure and dwelling splits are the starting point for negotiation for individual schemes (see Response

<sup>1</sup> DCA 2006 – Salisbury District Local Housing Needs and Market Survey Final Report Appendix 1 STU/03

<sup>2</sup> PPS 3 Housing (2006) NPP/03

to Matter 7). The ability of particular sites or schemes to accommodate such tenure splits or mix of dwellings must to be taken into account.

9.1.5 Core Policies 6, 10, 11, 14, 16 and 17 present evidence, derived from the Strategic Housing Market Assessment (DCA 2006) on the tenure and dwelling mix, but acknowledge that justified variations, based on new, sound evidence from either an updated SHMA or other credible evidence source, would also be appropriate.

9.1.6 PPS3<sup>3</sup> requires that Strategic Housing Market Assessment should be kept up to date. It is understood that the Council is about to commission work on a revised SHMA for South Wiltshire. Therefore, the core policies need to remain sufficiently flexible to accommodate the implications of the updated evidence, once available, and other market and viability considerations.

### **Conclusions**

9.1.7 Persimmon Homes and Wilton Estate note that the evidence base for Core Policies 6, 10, 11, 14, 16 and 17 is derived from the evidence included in the Council's Strategic Housing Market Assessment Appendix 1 (2006) (see Tables 1 and 2). The Council's SHMA is in the early stages of review and will eventually be replaced. The core policies appear to be sufficiently flexible to accommodate the implications of the latest available information, in accordance with PPS3 Para 29, once available.

9.1.8 It is critical to the delivery of development in South Wiltshire that the tenure and size of dwelling splits are treated as "targets" not as rigid, inflexible requirements. Core Policies 6, 10, 11, 14, 16 and 17 should be subject to minor changes to include reference to the viability test.

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<sup>3</sup> PPS 3 Housing (2006) NPP/03

## Q9.2

*Has the effect of Core Policies 6, 10, 11, 14, 16 and 17 on the economic viability of schemes been considered?*

- 9.2.1 Persimmon Homes and the Wilton Estate do not consider that the effect of Core Policies 6, 10, 11, 14, 16 and 17 on the economic viability of schemes has not been adequately considered. The policies should be subject to minor changes to refer to economic viability and market demand considerations and other evidence being taken into account.
- 9.2.2 Persimmon and Wilton note that this question addresses a similar point to Q7.2. Therefore, this response should be read in conjunction with the Persimmon and Wilton response to Matter 7.
- 9.2.3 Persimmon and Wilton note and welcome the Affordable Housing Economic Viability Study undertaken by Adams Integra (January 2009)<sup>4</sup>. This helpfully addresses some of the concerns arising from the Blyth Valley decision<sup>5</sup>.
- 9.2.4 However, the range and mix of house types and tenures identified by the DCA Study Area 'snap shot' point in time, based on the survey information that informed the 2006 study. The economic viability of future schemes must be assessed on a "Site by Site" basis and have different assumptions to those considered by Adams Integra which should be assessed at the time of submission.
- 9.2.5 However, the Adams Integra work is to be commended and complements the earlier DCA study. The Council has attempted to address economic viability at a level appropriate to guide the South Wiltshire Core Strategy. However, core policies 6, 10, 11, 14, 16 and 17 need to be more clear that the individual economic viability of schemes will be considered within the 'Site by Site' negotiations and that the tenure split and dwelling mix are not fixed by the CS.

### Conclusions

- 9.2.6 The economic viability of schemes has generally been addressed through the Adams Integra work. However, further minor changes to Core Policies 6, 10, 11,

<sup>4</sup> Affordable Housing Economic Viability Study Adams Integra (2008) STU/04

<sup>5</sup> Blyth Valley vs Persimmon Homes (North East) and Other (2008)

14, 16 and 17, clarifying that the economic viability of individual schemes and their tenure split and dwelling mix will be considered as part of the negotiations, would improve the overall effectiveness of the CS and, in turn, expedite the delivery of development in South Wiltshire.

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### Q9.3

*Are Core Policies 6, 10, 11, 14, 16 and 17 sufficiently flexibly or are they too prescriptive?*

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- 9.3.1 Persimmon Homes and Wilton Estate acknowledge that Core Policies 6, 10, 11, 14, 16 and 17 contain a degree of flexibility as the policies make clear that size and tenure will be negotiated on a 'Site by Site' basis. However, the policies are potentially too prescriptive. It is unclear whether the figures are a rigid pre-set mix or simply a target to provide a basis for negotiation. PPS3 indicates that the figures should be a target.
- 9.3.2 Given that the SHMAA is being updated shortly the tenure and dwelling size mix will soon be superseded by more up to date information, this updated information should guide and inform future negotiations, once available, particularly at the Strategic Allocations.
- 9.3.3 What is unclear about the proposed mix in Core Policies 6, 10, 11, 14, 16 and 17 is whether the specified mix is intended to apply all developments or schemes more than 5, more than 15 or more than 25 dwellings. A cross reference to the thresholds on Core Policy 3 would also help clarify matters and improve the overall effectiveness of the plan..
- 9.3.4 Persimmon and Wilton are concerned that the tenure and dwelling mix will potentially be applied too rigidly and fail to take account of overall scheme viability and other infrastructure considerations. Therefore, the policies should make clear, beyond any reasonable doubt that the figures are targets and provide the basis for negotiations. Unless the Council regard the figures as a "target" there can be no effective negotiations on individual schemes.

### Conclusions

- 9.3.5 Persimmon Homes and Wilton Estate acknowledge Core Policies 6, 10, 11, 14, 16 and 17 have a degree of flexibility given the stated intention to negotiate. However, the policies are potentially too prescriptive as they appear to suggesting a standard mix in each Community Area for every type and size of development, without having regard to the composition of adjacent development in the locality or scheme viability and other infrastructure costs.

#### Q9.4

*Why is no mention made of housing density?*

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- 9.4.1 Persimmon Homes and Wilton Estates note that the South Wiltshire Core Strategy makes no mention of housing density. The Core Policies and Strategic Allocation templates are silent on the issue of density, despite the advice in PPS3 and emerging RSS10.
- 9.4.2 Persimmon and Wilton note that PPS3 Paras 45 – 50<sup>6</sup>, set out the national position in respect of density and achieving an effective use of land by development. Para 47 states that the LPA may wish to set out a range of densities.
- 9.4.3 The Council has specifically and intentionally not made reference to density in the South Wiltshire Core Strategy. The Council is content to rely on the guidance provided by Policy H2 of emerging RSS10. This seeks to achieve a target net density of 40 dph, averaged across all new housing in the Housing Market Areas and seek to ensure that net density of housing development within the SSCTs, including Salisbury, falls within the range of 40 – 50 dph, with higher densities in the most accessible locations. LPAs should promote net densities of 50 dph or more overall in planned urban extensions to SSCTs and adjacent new communities.
- 9.4.4 It should be noted that Persimmon Homes has objected to RSS10 Policy H2.
- 9.4.5 Persimmon and Wilton consider that the density of schemes should be determined from a consideration of “Bottom up” factors such as tenure mix and dwelling size targets, constraints and opportunities and market demand and viability considerations, rather than a pre-set density, which have no regard to local context.
- 9.4.6 Persimmon and Wilton will achieve an efficient use of urban land at Fugglestone Red, in line with PPS3. Regard will be given to emerging RSS Policy H2 and

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<sup>6</sup> PPS3 Housing (2006) Paras 45 – 50 NPP/03

other considerations, when formulating the master plan for the site. Particular regard will be given to the "Creating Places" SPG.

9.4.7 Persimmon and Wilton believe that density is a county-wide matter which is best left for the Wiltshire Core Strategy to address.

9.4.8 It would be more than a minor change to apply specific densities to all the Strategic Sites and for other development in the respective community areas, which would need to be subject to thorough consultation.

### **Conclusions**

9.4.9 Persimmon and Wilton note that the South Wiltshire Core Strategy makes no mention of housing density, despite the policy advice set out in PPS3 and emerging RSS10.

9.4.10 This position is appropriate given the short "shelf life" of the CS and the point that density is a county-wide matter, better addressed by the Wiltshire Core Strategy.

**Summary Table 1 South Wiltshire Housing Needs**

**Affordable Housing by Size and Type – Number of Units**

Property Size	Type of Affordable Housing Needed	Salisbury CA	Wilton CA	Amesbury CA	Southern Wiltshire CA	Mere CA	Tisbury CA
1 bed	Affordable Rent	188	106	115	51	0	26
	Shared Ownership	25	0	38	25	0	27
2 bed	Affordable Rent	271	121	118	19	53	27
	Shared Ownership	113	35	110	14	0	0
3+ bed	Affordable Rent	339	29	26	22	47	0
	Shared Ownership	137	20	0	0	0	53
Total	Affordable Rent	798	256	259	92	53	53
	Shared Ownership	275	55	148	39	0	80
	All Affordable	1,073	311	407	131	100	133

**Table 1 (contd)**  
**Private Sector Requirements**

Property Size	Type of Affordable Housing Needed	Salisbury CA	Wilton CA	Amesbury CA	Southern Wiltshire CA	Mere CA	Tisbury CA
1 bed	General Market	170	0	80	41	0	0
	Private Rented	226	4	48	37	0	10
2 bed	General Market	818	181	183	86	17	23
	Private Rented	296	172	59	73	0	5
3 bed	General Market	665	47	161	111	47	91
	Private Rented	36	57	36	0	6	36
4+ bed	General Market	630	20	206	199	20	106
	Private Rented	54	0	0	0	21	0
Total	General Market	2,283	393	630	437	84	220
	Private Rented	612	233	143	110	27	51
Combined Total	All	2,895	626	773	547	111	271
	Affordable Housing	1,073	311	407	131	100	133
Private Sector	Private Sector	2,895	626	773	547	111	271
	All	3,968	937	1180	678	211	404

\* Source:- DCA Local Housing Needs and Market Survey (2006) STU/03

**Summary Table 2 South Wiltshire Housing Needs**

**Affordable Housing by Size and Type**

Property Size	Type of Affordable Housing Needed	Salisbury CA	Wilton CA	Amesbury CA	Southern Wiltshire CA	Mere CA	Tisbury CA
1 bed	Affordable Rent	18%	34%	28%	39%	0%	20%
	Shared Ownership	2%	0%	10%	19%	0%	20%
2 bed	Affordable Rent	25%	39%	29%	14%	53%	20%
	Shared Ownership	11%	11%	27%	11%	0%	0%
3+ bed	Affordable Rent	31%	9%	6%	17%	47%	0%
	Shared Ownership	13%	7%	0%	0%	0%	40%
<b>Total</b>		100%	100%	100%	100%	100%	100%

**Table 2 (contd)**

**Private Sector Requirements**

1 bed	General Market	14%	2%	17%	14%	0%	4%
2 bed	General Market	38%	56%	31%	29%	15%	10%
3 bed	General Market	24%	25%	25%	20%	48%	47%
4+ bed	General Market	24%	17%	27%	37%	37%	39%
<b>Total</b>		<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

\* Source:- DCA Local Housing Needs and Market Survey (2006) STU/03