19 May 2014

Mr A Seaman
The Planning Inspectorate
4/03 Kite Wing
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Mr Seaman

Planning Practice Guidance

As requested in your letter of 20 March 2014 the Council has considered the extent to which the Planning Practice Guidance affects the content of the Core Strategy.

Overall, we consider that it is generally consistent with the Planning Practice Guidance (PPG) possibly with the exception of a few areas that are discussed below. This is perhaps not surprising given that the guidance does not change existing Government Policy as set out in the National Planning Policy Framework.

(i) Wherever possible, local needs assessments should be informed by the latest available information. Local Plans should be kept up-to-date, and a meaningful change in the housing situation should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued. The 2011-based Interim Household Projections only cover a ten year period up to 2021, so planners would need to assess likely trends after 2021 to align with their development plan periods. (Paragraph 2a-015)

The PPG methodology refers to using the latest household projections to inform Objectively Assessed Need (OAN) - ‘2011-based Interim Household Projections’ and as such suggests that the OAN could be lower than the level referred to in your 10th Procedural Letter. These figures have already been considered as part of the examination proceedings and the Council provided its response on these projections in the paper ‘Response to 2011 Interim Household Projections and the Regional Strategy for the South West (Revocation) Order 2013’ (EXAM 19), which suggest the starting point for the OAN of 39,400 dwellings. Previously those objecting to the use of the projections pointed out that they are interim figures and should not therefore be afforded any weight. However, the PPG could now be seen to tip the balance in favour of their use.

Notwithstanding this, by taking a cautious approach to the projections and applying a positive approach to planning for housing in recognition of national policy to boost the supply of housing the Council considers that the housing requirement should remain at 42,000 dwellings.

(ii) Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. The approach taken, which may include site allocations, should be clearly set out in the Local Plan. (Paragraph 3-037)
Residential institutions in Use Class C2 are not included within the Council’s published Housing Land Supply Statement and their inclusion will have the effect of contributing towards the delivery of the housing requirement and increasing the deliverable supply. Having not included this source, our land supply calculations portray a conservative position in relation to 5 year supply.

(iii) Consideration of land stability in local plans will vary between areas and the types of issues that the plan covers, but planning authorities may need to consider: identifying specific areas where particular consideration of landslides, mining hazards or subsidence will be needed; including policies that ensure unstable land is appropriately remediated, prohibit development in specific areas, or only allow specific types of development in those areas; circumstances where additional procedures or information, such as a land stability or slope stability risk assessment report, would be required to ensure that adequate and environmentally acceptable mitigation measures are in place; and removing permitted development rights in specific circumstances. (Paragraph 45-003)

The Core Strategy does not contain policy in relation to land stability nor are there policies elsewhere in the development plan to address this. Instead and to avoid duplication national policy in the form of ‘PPG14 Development on Unstable Land’ was used. National policy has been used robustly in decision making for the exceptional cases where this has applied in Wiltshire and can continue to do so. The need to introduce specific local plan policy will be reviewed and considered through the planned partial review of the Wiltshire Core Strategy.

If you have any further queries regarding the above please let us know. We will of course provide officer responses to any comments submitted through the consultation regarding the implications the PPG may have on the Core Strategy.

We hope that this is helpful and can contribute positively to the expedient conclusion of the Examination.

Yours sincerely

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