



Working towards a core strategy for Wiltshire

Wiltshire Core Strategy

Topic Paper 15 addendum – Housing Requirement Technical Paper

28 February 2014

Wiltshire Council

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Introduction

- 1.1 On July 10th 2012, Wiltshire Council submitted the Wiltshire Core Strategy (WCS) to the Secretary of State for independent examination. The WCS proposed that a minimum of 37,000 homes should be built from 2006 to 2026 within Wiltshire. The evidence for this is set out in Topic Paper 15.
- 1.2 The inspector wrote to the Council on 2nd December proposing to increase the housing requirement to approximately 42,000 new dwellings.
- 1.3 This addendum to Topic Paper 15 considers how this revised housing requirement can be accommodated in the WCS. Such a modification has implications for other parts of the WCS in particular the disaggregation of housing across the three Housing Market Areas (HMAs), the distribution of housing to community areas and the indicative land supply. This paper focuses on these aspects and contains the following:
- a disaggregation of housing requirements to
 - Housing Market Areas (HMAs);
 - Principal Settlements, Market Towns, Local Service Centres in South Wiltshire and Community Area remainders
 - A statement of housing land supply; and
 - A housing trajectory for each of the HMAs

PART 1: METHODOLOGY

Context

- 2.1 In his letter, the Inspector's interpretation of all the evidence leads him to find that the objectively assessed housing need across the three Wiltshire HMAs would be in the region of 44,000 homes for the plan period.
- 2.2 He also notes the broad acceptability of between 35,800 and 42,100 new homes over the plan period. He is minded to find that the WCS housing requirement should be expressed as a minimum figure towards the upper end of this range.
- 2.3 One relevant aspect, clear in his letter, is for the WCS to be 'aspirational but realistic'. Setting a housing requirement that is undeliverable may compromise the ability of the Plan to effectively deliver sustainable forms of development supported by adequate infrastructure.
- 2.4 The realism of being able to deliver scales of development is a factor influencing what constitutes appropriate scales of development at each area level of the Plan as a part of being effective and consistent with the policies set out in the NPPF.
- 2.5 The inspector has also indicated a need for the Plan to be flexible. A disaggregation to settlement¹ and community area remainders should not be so prescriptive as to be inflexible and potentially ineffective in delivering the identified level of housing for each market area.
- 2.6 Instead the disaggregation of housing provision to the level of each settlement and community area remainder provides clarity about the Council's intentions, in the knowledge of likely constraints; in terms of market realism, infrastructure and environmental capacity. Levels of development for each settlement and community area remainder are therefore indicative rather than maxima or minima. They provide a strategic context for the preparation of the Housing Sites Allocation DPD and in order to plan for appropriate infrastructure provision. However, the HMA requirements should be maintained as minima in order to ensure that sufficient supply is forthcoming across the areas.
- 2.7 Indicative housing land supply, based around trajectories for each of the HMAs provide some detail on where the Housing Sites Allocation DPD should focus and by when it needs to have sites identified in order to sustain proposed rates and scales of housing development. It forms the evidence basis for an implementation strategy for the full range of housing describing how the Council will maintain delivery of a five-year supply of housing land.

A 'Pro-Rata' Approach

- 3.1 The Council replied to the Inspector's letter of 2nd December saying that it was minded to use a methodology based on the distribution of the additional growth on a proportionate basis, in order to maintain the integrity of the spatial strategy and the current balance of growth between each area. It provided the Inspector with a detailed

¹ Principal Settlements, Market Towns and in the South Wiltshire HMA Local Service Centres

methodology accompanying its letter to him on the 29th January and he replied to say the approach appeared logical².

3.2 The starting point of the methodology is that each part of the County should receive a proportionate, pro-rata, increase in the amount of housing it should accommodate. However, it may not be appropriate for every settlement and community area remainder to accommodate a pro-rata increase. Whether the level of additional growth is appropriate or not will be tested against three questions:

- Is the implied rate of house building unrealistic?
- Are there any insurmountable infrastructure barriers that prevent the proposed scale of development?
- Are there insurmountable environmental constraints to allocating the proposed scale of development?

3.3 Each settlement and community area remainder is therefore tested as to whether or not the pro-rata increase is acceptable (Step 1). Areas that cannot accommodate this level of growth are identified (Step 2). Any resulting shortfall is then redistributed to other settlements and areas on the same pro-rata basis (Step 3). This further increase is tested. The cycle continues as necessary until all the housing increase is accounted for. The methodology is explained in detail below.

Methodology for disaggregation to settlements and community area remainders

- 4.1 The central principle of the methodology is that the distribution of new housing should accord with the Plan's spatial strategy. In effect the starting point is that the relative contribution that each settlement and area of the County makes to overall growth remains the same. Each part of the County should therefore receive a proportionate, pro-rata, increase in the amount of housing it should accommodate.
- 4.2 Of the 42,000 proposed housing requirement, 900 dwellings sit outside this methodology as they have already have consent and have been permitted as schemes as part of the expansion of the Swindon urban area. The approach therefore disaggregates the remainder and amounts to increasing the housing by approximately 12%³.
- 4.3 This approach provides the best prospects for balanced growth as it reflects the relative economic potential of each settlement as already evidenced in studies and assessments made preparing the Plan and set out in the spatial strategy.

Step 1 - testing proposed scales of development

- 4.4 Step 1 is the central part of the process and assesses whether or not each settlement and community area remainder can actually accommodate a pro-rata increase. There are three questions:
- Is the implied rate of house building unrealistic?
 - Are there any insurmountable infrastructure barriers that prevent the proposed scale of development?

² Inspector's 12th procedural letter 4th February 2014

³ 11.67% rounded to nearest integer

- Are there insurmountable environmental constraints to allocating the proposed scale of development?
- 4.5 How each of these questions is answered is set out below, but if the answer to any is 'yes', then a settlement and community area remainder cannot accommodate the proposed increase to the scale of development. In these circumstances a lower scale of development is determined and evidenced to set a realistically deliverable rate of house building within infrastructure and environmental restrictions.
- 4.6 The process uses existing evidence including:
- Past rates of completions;
 - Strategic housing land availability assessment⁴;
 - Previous sustainability appraisal of strategic sites options⁵;
 - Evidence, comments and representations already made by the Environment Agency, Highways Authority, Natural England and English Heritage (the 'statutory agencies') in the process of preparing the WCS.
- 4.7 This step produces a subset of settlements and community area remainders that cannot achieve the proposed increase in scale of development and will result in a shortfall compared to the proposed scale of development of 42,000 homes.

Is the proposed rate of house building unrealistic?

- 4.8 In some settlements and community area remainders there may already be sufficient land in the pipeline to ensure that an increased scale of development can be met, measured by dwellings already built, an estimate of additional dwellings with planning permission and an allowance for 'windfall' development (small unidentified brownfield sites within built up areas⁶). This would tend to indicate that the increased level of development is acceptable.
- 4.9 In other areas, the realism of increasing rates of house building is considered in terms of whether house builders will or will not be capable of building and selling the scale of additional housing being suggested.
- 4.10 Past rates of housing (over the period 2006-2013) in each settlement and community area remainder are compared to the rate implied by the proposed scale of development. The proposed level of new homes is considered unrealistic if the implied rate of house building for the remainder of the plan period is being expected to more than double what has been achieved in recent years. In some areas the Plan may already propose aspirational rates of increased housing delivery and a further increase could be counterproductive and not result in increased delivery during the Plan period. In others there may have been under delivery for a variety of reasons and past rates may not be a true reflection of what the private sector might otherwise deliver, but more than doubling rates is the upper limit for what is considered a reasonable ceiling for a realistic upturn.

⁴ Wiltshire Strategic Housing Land Availability Assessment 2012

⁵ Working towards a Core Strategy for Wiltshire, Sustainability Appraisal/Strategic Environmental Assessment, Sustainability Report, June 2012

⁶ Sites less than 5 dwellings or 0.15ha

Are there any insurmountable infrastructure barriers that prevent the proposed scale of development?

4.11 There may be insurmountable infrastructure barriers to increasing scales of development in some settlements and community area remainders. Additional development implies a greater need for infrastructure everywhere. However there may be an essential item of infrastructure on which additional development in the plan period will depend and it may be impractical or unrealistic to deliver. The scale of development proposed in that settlement or community area remainder will therefore need to reflect this. In such cases the Council will identify what infrastructure is so critical, explaining the reasons, why it cannot be delivered and set the housing requirement in this context.

Are there insurmountable environmental constraints to allocating the proposed scale of development?

4.12 The proposed scale of additional development may have unacceptable environmental impacts and identifying additional sites will not be possible. The evidence for this would come from the Council's SHLAA showing very few realistic acceptable options for further growth, the previous sustainability appraisal of strategic site options showing negative effects indicating further growth may not be possible, and/or statutory agencies like Natural England and the Environment Agency voicing objections. As a consequence the scale of additional development in some settlements and community areas will be reduced to reflect such constraints, which will be evidenced and explained.

Step 2 - recording 'constrained' areas

4.13 This is in effect the output from step 1. It is to evidence, understand and document the particular factor impeding growth in those areas where proposed additional scales of development cannot be accommodated; the realism of the proposal, the lack of adequate infrastructure or a particular environmental constraint. It evidences and provides an explicit statement of the assumptions underpinning the decisions taken.

Step 3 - redistribution to other areas

4.14 The 'shortfall' created by constrained settlements and community area remainders is redistributed to others with potential capacity for growth and represents a further increase in those areas. This additional housing is added on a proportional basis and the revised scales of development are tested again in exactly the same way as the first testing iteration.

4.15 Redistribution retains the broad balance of housing provision between housing market areas and continues the Plan's 'bottom up' approach of considering the potential and constraints of each settlement and community area remainder individually.

4.16 Officers in neighbouring authorities have been informally consulted on initial outcomes in order to ensure a fit with neighbouring authority strategies as also have the statutory agencies (English Heritage, Environment Agency, Highways Agency and Natural England). None have raised any objections to the approach taken or the proposed level. Statutory agencies stated that they will make detailed comments on proposals for specific sites inputting fully into the preparation of the Housing Site Allocation DPD and Neighbourhood Plans.

PART 2: OUTPUTS

Output

5.1 The results provide Housing Market Area requirements distributed to settlements and community area remainders. These are as follows:

Area	Submission Requirement	Proposed Indicative Requirement
Devizes town	1730	2010
Devizes remainder	420	490
Marlborough town	610	680
Marlborough remainder	240	240
Pewsey	600	600
Tidworth & Ludgershall	1750	1750
Tidworth remainder	150	170
East Wiltshire HMA	5500	5940
Amesbury, Bulford & Durrington	2100	2440
Amesbury remainder	295	345
Mere town	200	235
Mere remainder	50	50
Salisbury City/Wilton town	6060	6060
Wilton remainder	220	255
Downton town	190	190
Southern Wiltshire remainder	365	425
Tisbury town	200	200
Tisbury remainder	220	220
South Wiltshire HMA	9900	10420
Bradford on Avon town	510	595
Bradford on Avon remainder	160	185
Calne town	1240	1440
Calne remainder	140	165
Chippenham town	4000	4510
Chippenham remainder	500	580
Corsham town	1050	1220
Corsham remainder	150	175
Malmesbury town	760	885
Malmesbury remainder	440	510
Melksham town	1930	2240
Melksham remainder	110	130
Royal Wootton Bassett town	920	1070
Royal Wootton Bassett & Cricklade remainder	330	385
Trowbridge town	5860	6810
Trowbridge remainder	140	165
Warminster town	1650	1920
Warminster remainder	120	140
Westbury town	1290	1500

Westbury remainder	100	115
North and West Wiltshire HMA	21400	24740
West of Swindon	200	900
Wiltshire	37000	42000

Table 1: Settlement and Community Area: Proposed indicative housing requirements 2006-2016 ('Constrained areas' highlighted)

- 5.2 The step by step calculations leading to these indicative levels are shown in full in **Appendix 1**.
- 5.3 Those settlements and community area remainders that are highlighted are those where scales of development have been constrained. A summary of the reasons and evidence justifying this judgment are set out for each of the areas affected in section 7 below.
- 5.4 Each HMA has the requirement as in table two:

Housing Market Area	Submission Requirement		Proposed requirement	
		% of total		% of total
East Wiltshire	5500	15%	5940	14%
South Wiltshire	9900	27%	10420	25%
North and West Wiltshire	21400	58%	24740	59%
West of Swindon	200	1%	900	2%
Wiltshire	37000	100%	42000	100%

Table 2: Housing Market Areas : Proposed Minimum Housing Requirements 2006-2026 (Submission and Proposed requirements)

Sustainability and Habitats Regulation Assessment

- 6.1 The Sustainability Appraisal (SA) framework was applied to the outputs, to identify if the changes that the methodology suggests produce effects that question whether this is the most appropriate approach. The results are presented in an addendum to the SA report.
- 6.2 The Inspector has already noted that the preferred Option 1 within the Council's SA identifies the broad acceptability of between 35,800 and 42,100 new homes. This element has therefore not been reviewed.
- 6.3 The addendum to the SA reports on the nature and scale of additional effects that increased housing requirements may have on each individual community area. Generally, the effects are not so significant as to justify amending the methodology. This is perhaps unsurprising given the methodology's emphasis upon the current spatial strategy and known constraints, which have already been considered in the process of preparing the Plan.

Constrained Areas

- 7.1 Several areas within the County have not been considered capable of accommodating any or a full pro-rata increase (i.e. those areas highlighted in Table

one). The evidence for the reasoning underpinning these decisions is summarised below.

Areas of Outstanding Natural Beauty (AONB): Marlborough Town, Marlborough Community Area (CA) remainder, Pewsey CA, Mere CA remainder, Tisbury Village and Tisbury CA remainder.

- 7.2 The NPPF requires that great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.
- 7.3 Natural England previously raised significant concerns about the scale of development proposed in Wiltshire's AONBs. In particular it has made specific objections about the expansion of Marlborough and the release of greenfield sites⁷. These objections have been supported by the relevant AONB management boards⁸.
- 7.4 In Marlborough, the single acceptable strategic site cannot be readily expanded as, amongst other possible issues, it needs to remain contained below a certain height up the hillside. Instead, the indicative scale of proposed development reflects an approximate capacity of the urban area to deliver new housing from evidence of sites put forward through the SHLAA process.
- 7.5 Elsewhere the WCS already proposes relatively significant increases in the implied rates of house building within the AONBs. SHLAA evidence shows little or no potential to increase proposed rates. The total of potential sites put forward within built up areas as a part of the SHLAA assessment falls well short of currently proposed levels⁹.
- 7.6 Development will be achieved by 'windfalls' from other, generally small, but unidentifiable sites within urban areas. However this reliance inevitably involves some uncertainty. There is no firm basis to say this source of supply can increase and, if it should increase, how this might not also involve more pressure for loss of countryside, the cumulative effect of which would be a conflict with the over-riding conservation objective of landscape designation.

New Forest Special Protection Area (SPA): Downton

- 7.7 SPAs are strictly protected sites classified in accordance with Article 4 of the EC Birds Directive. They are designated for the protection of rare and vulnerable birds (as listed on Annex I of the Directive).
- 7.8 An appropriate assessment of the likely effects of development on the New Forest SPA¹⁰ concluded that even small scales of development in combination with increases in visitors from developments promoted in other districts created the potential for adverse effects which cannot be ruled out. Natural England does not object to the currently proposed levels. To avoid the potential for adverse effects the current scale of development is retained.

⁷ Letter from Natural England to Wiltshire Council, 25th June 2013 (EXAM/31)

⁸ Representation by The North Wessex Downs AONB Office, November 2012 (REP/06)

⁹ The SHLAA identifies potential capacity for approximately 150 dwellings in these areas, compared to more than 500 remaining from the amount of housing proposed in the submitted plan.

¹⁰ South Wiltshire Proposed Submission Core Strategy Habitats Regulations Assessment, July 2009

Realistic rates of house building: Tidworth and Ludgershall, Salisbury/Wilton and Chippenham Town

7.9 The adopted South Wiltshire Core Strategy has provided certainty on what new strategic housing sites should be developed. The Strategy, adopted in 2012, identifies a significant increase in land available for development particularly at Salisbury and Wilton. Although rates of house building have not increased markedly from the trend of several years past and are yet to match the plan expectation when considered as an annual average (See figure 4 below), allocations and deliverable supply ensure a good range of land opportunities to developers. With economic recovery there is scope for a significant uplift and there is already sufficient land committed in the WCS to cater for house building to more or less double throughout the entire remainder of the plan period.

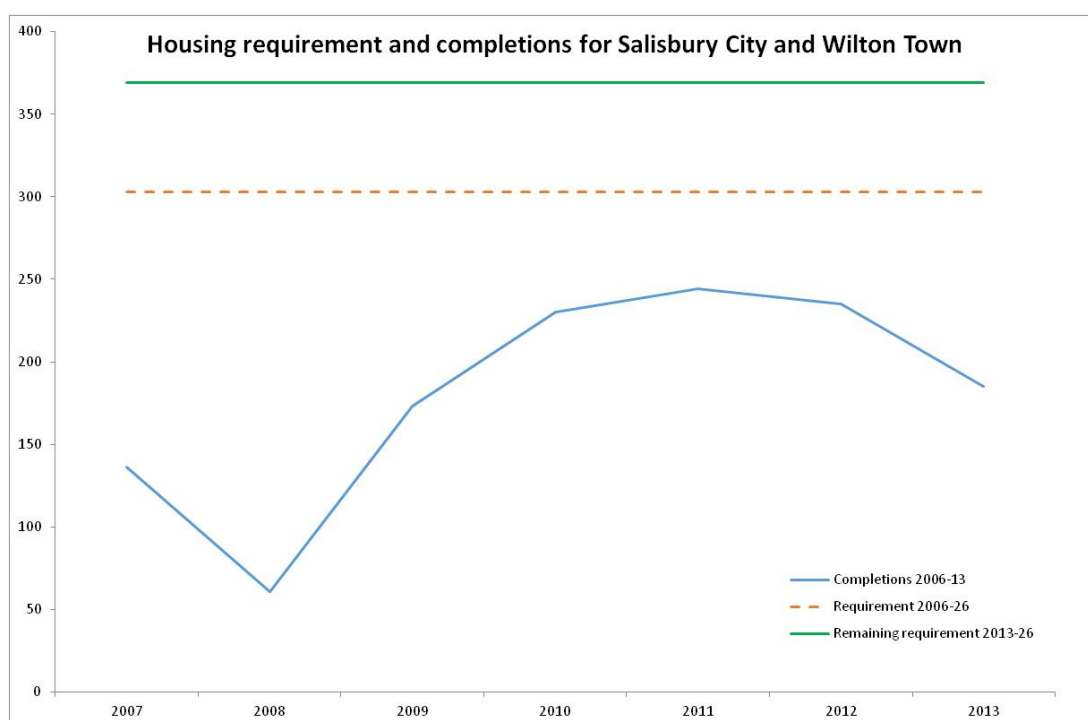


Figure 4: Salisbury - Actual housing completions compared to development plan expectations

7.10 However, it is highly unlikely that demand in the local housing market would support an even greater increase. Evidence based on fluctuations in house building rates in Wiltshire does justify a comparable uplift not having ever taken place before¹¹. Raising the indicative scale of new housing would be counterproductive and not deliver further housing, potentially blighting land. The WCS should be deliverable over its period. Providing for more growth than can take place would create requirements for infrastructure that would not materialise, creating uncertainty and potentially misleading providers.

7.11 For the same reasons, increases in housing provision elsewhere are also capped at an upper limit of a doubling of house building rates over the remainder of the plan

¹¹ The inspector's report on the South Wiltshire Core Strategy noted that a 20% increase per annum as the greatest increase nationally that has been achieved over any 10 year span in the post war period. Paragraph 40, Report on the examination into the South Wiltshire Core Strategy Development Plan Document, October 2011.

period. A scale of development implying a rate in excess is considered an unrealistic basis upon which to plan.

- 7.12 A relatively significant amount of land is proposed for the expansion of Tidworth and Ludgershall. The settlements' futures are linked to growth stimulated in large part by the army rebasing taking place in coming years¹². Current rates of growth are aspirational and a further increase is considered unrealistic.
- 7.13 Rates of housing development at Chippenham are set to increase over the plan period and it is proposed to increase them further in accordance with the pro-rata approach (see table one) but not beyond a realistic level. Rates of house building have been lower than anticipated for a number of years and plan allocations are set to boost housing supply quite significantly so they more properly reflect the role and function of the settlement as one of the County's Principal Settlements. Again however, in setting a scale of development the Plan needs to achieve a balance between being both 'aspirational yet realistic'.
- 7.14 However, the Plan approach to Chippenham is set apart from other settlements listed in Core Policy 1 by having no allocated strategic sites but a substantial requirement for Greenfield development. The town has an economic potential that has not been reflected in recent rates of housing development. Allocations that exceed indicative housing requirements may help to deliver important infrastructure and can provide for a long term development strategy so its economic potential is realised. Rather than an indicative requirement provision should therefore be set at a minimum to provide the flexibility to allocate sites that can most effectively articulate the most sustainable pattern for the town's long term growth.

Infrastructure constraints

- 7.15 No areas of the County are considered as being constrained by any insurmountable infrastructure barriers. Infrastructure needs have therefore not influenced indicative housing requirements. Increased housing requirements will inevitably increase requirements for infrastructure. Generally, these will influence site selection and policies contained within site allocation DPDs. However, in some areas and most notably Trowbridge, the need to improve secondary school provision will take time and may affect the timing of additional housing development in particular areas.
- 7.16 In Trowbridge the need to first deliver improved secondary provision as a part of developing the Ashton Park strategic site will mean that the further increase in housing provision should follow only once this is in place. This will need to be articulated in a revision to Core Policy 29 alongside the need for further assessment of the mitigation necessary to safeguard the protection of bats and their habitats.¹³

Housing Land Supply

- 8.1 NPPF asks each Local Planning Authority to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and

¹² Wiltshire 2026 Settlement Strategy Background Paper – Appendix C contains the detailed Role and Function analysis of each individual settlement (STU/107)

¹³ Update to Wiltshire Core Strategy Habitat Regulations Assessment, February 2014

competition in the market for land. This accords with national policy and the Inspector's letter dated 2nd December 2013.

8.2 Table 3 of the Council's Housing Land Supply statement¹⁴ sets out the deliverable housing land supply for the period 2013-2018 for each HMA based on a requirement of 37,000 new homes over the plan period. This is revised by table three below that shows the information updated to reflect the current land supply and the revised HMA requirements.

Housing Market Area	Housing Requirement 2006-2026	Estimated housing completions 2006-2014	Five year housing requirement 2014-2019	Deliverable supply 2014-2019	Number of years deliverable supply
East Wiltshire	5,940	2,636	1,377	1,545	5.61
North and West Wiltshire	24,740	9,233	6,461	7,285	5.64
South Wiltshire	10,420	3,305	2,965	3,592	6.06
Swindon (within Wiltshire)	900	156			

Table 3: Housing Land Supply relative to the housing requirement (Updated table 3 of the Housing Land Supply Statement, August 213)

8.3 Each of the HMAs currently has five years' supply of deliverable land for housing development. This is illustrated in the housing trajectories presented below.

Housing trajectories

9.1 Each HMA housing trajectory shows annual scales of housing development over the plan period. They show dwellings completed each year from 2006 to the present and forecast completions from the present to the end of the plan period. This includes known commitments and an allowance for small windfall sites only and will be supplemented by further sites such as those identified in Neighbourhood Plans and the Housing Site Allocations DPDs as well as on other windfall sites. Delivery rates are informed by evidence collated from each individual house builder about anticipated starts on sites and rates of sales using their market experience. The delivery assumptions are then validated and supplemented by information from Council officers. The delivery rate is also compared with historic delivery rates of similar sized sites attained within Wiltshire. The result of this analysis informs a site specific delivery schedule that aligns with the requirements of footnote 11 of the NPPF and the National Planning Practice Guidance.

9.2 The profile of housing delivery varies between the HMAs and is illustrated in Figures one to three, which are discussed in turn below. Housing land supply remains relatively strong in the south, reflecting decisions that have already been taken about sites through the adopted South Wiltshire Core Strategy. The trajectory shows a sufficient supply of deliverable land to support a five year supply for the 4 years 2014/15. 2014/15.

¹⁴ Housing Land Supply Statement, August 2013

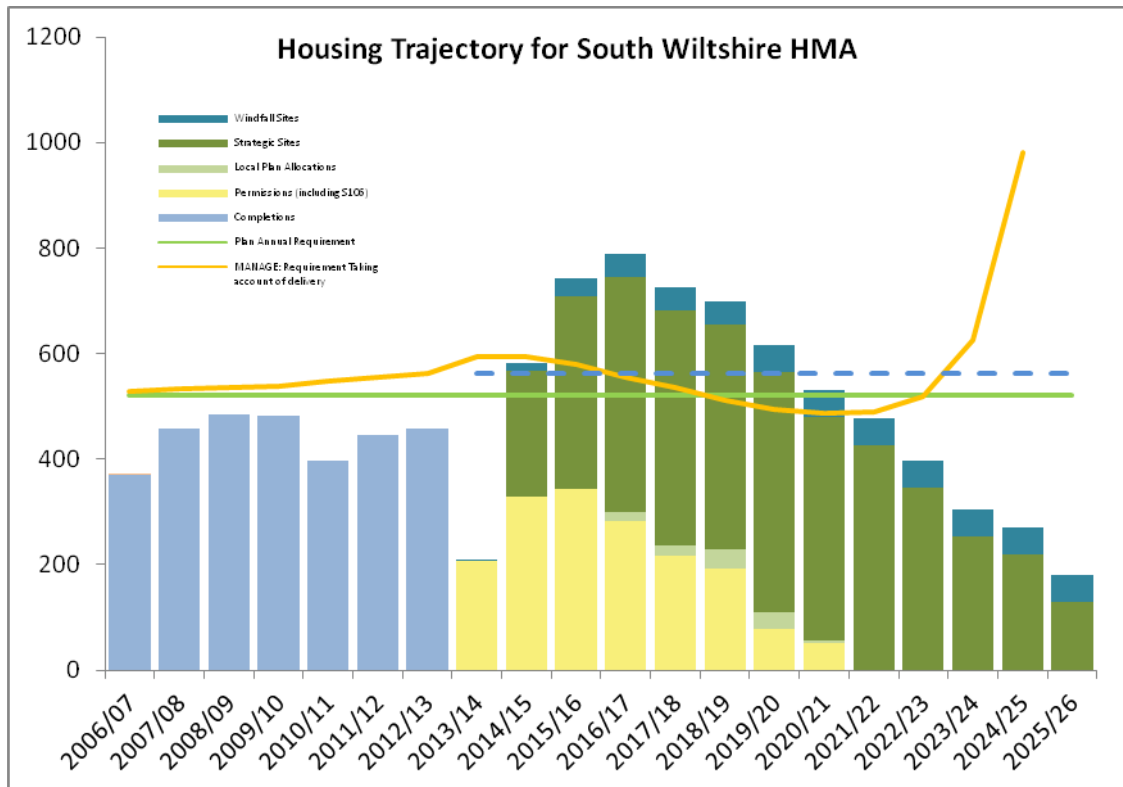


Figure one: Housing Trajectory 2006-2026: South Housing Market Area

9.3 The North and West HMA shows the predicted impact of large strategic sites becoming a significant component of land supply now that the WCS is progressing to adoption. It shows a need for more land to be allocated for housing toward the end of the plan period within a Housing Site Allocation DPD and a need for strategic sites to be allocated at Chippenham, as a part of the Chippenham Site Allocation DPD. Scheduled for adoption by July 2015¹⁵ the Housing Site Allocation DPD will help sustain the higher rates of house building instigated by the growth plans of the core strategy continuing the significant boost to housing supply the trajectory requirements indicate. The trajectory indicates that there is a sufficient supply of deliverable land to support a five year supply for the 3 years from 2014/15.

¹⁵ Wiltshire Council Local Development Scheme 2014

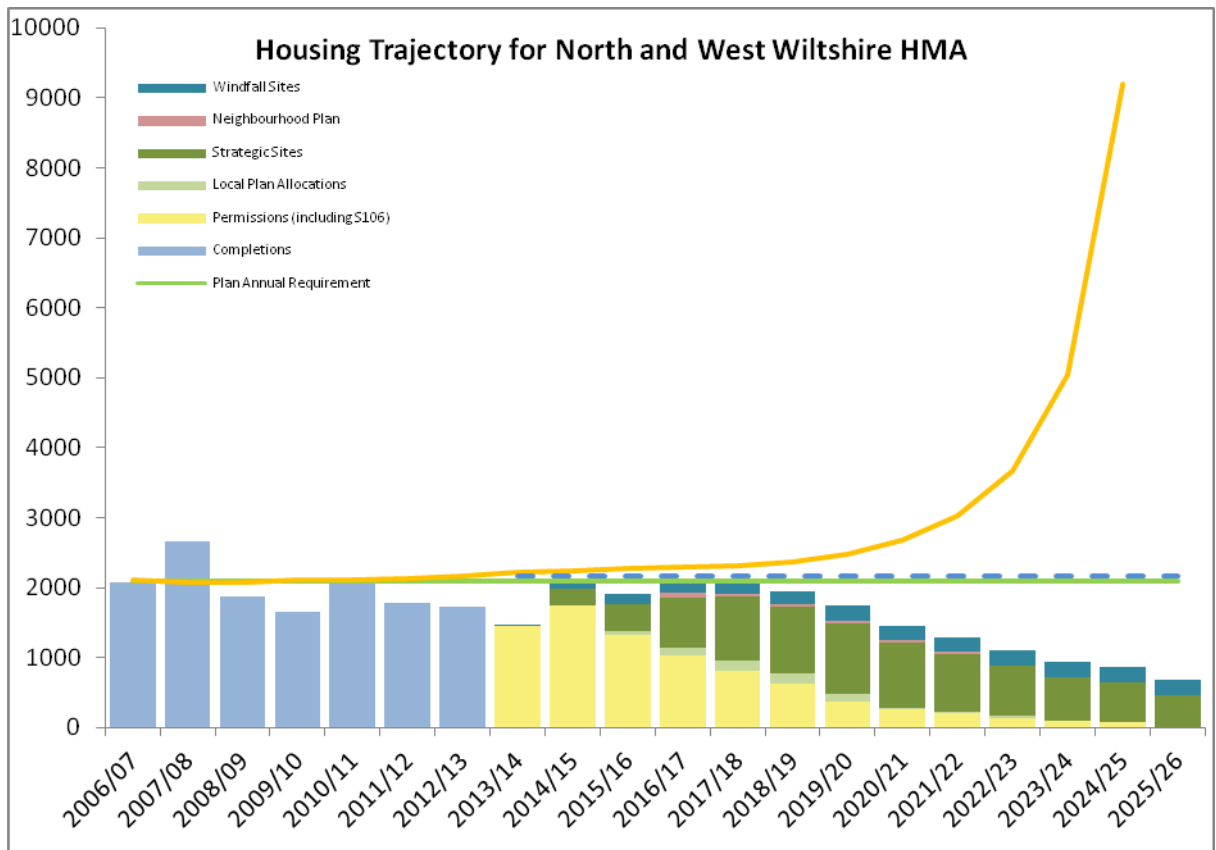


Figure two: Housing Trajectory 2006-2026: North and West Housing Market Area¹⁶

9.4 The much smaller East HMA show a similar pattern to the North and West with house building rates from strategic sites expecting to peak in 2016-2019 followed by the Housing Site Allocation DPD supplementing land supply with deliverable sites thereafter for the remainder of the plan period. The trajectory shows a sufficient supply of deliverable land to support a five year supply for the 2 years from 2014/15.

¹⁶ Strategic site allocations do not include land at Chippenham (former daft strategic sites in the submitted core strategy) considered 'deliverable' in terms of five year housing land supply. This source of supply has not been included.

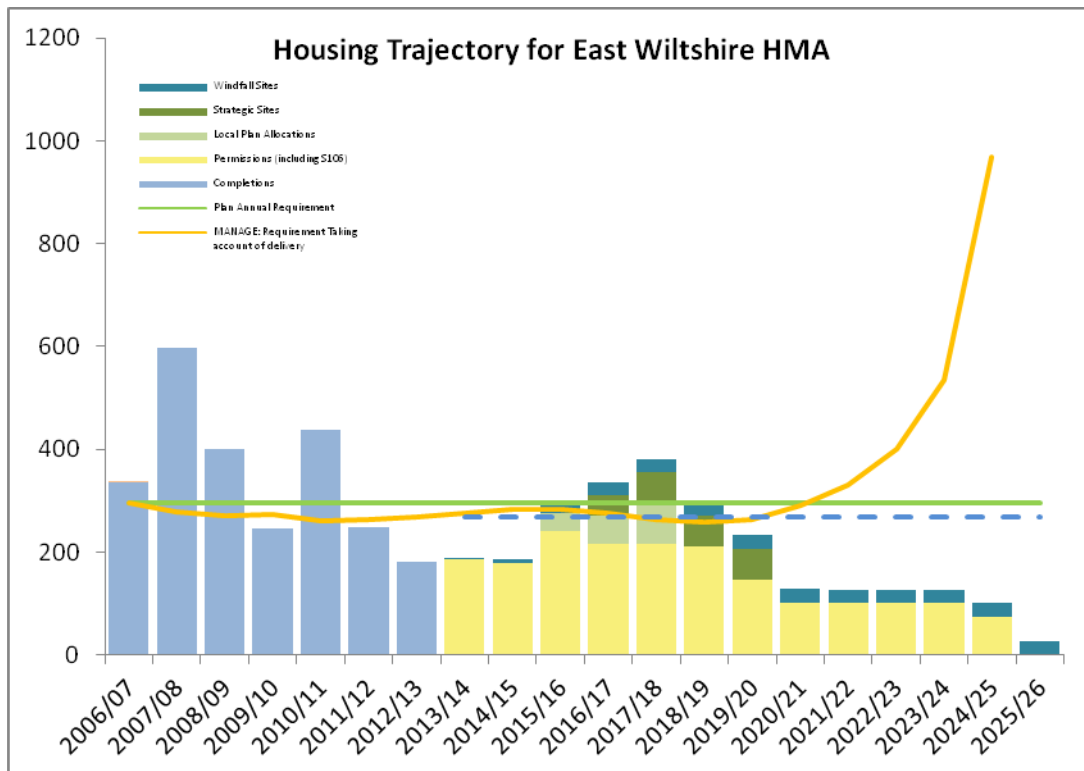


Figure three: Housing Trajectory 2006-2026: East Housing Market Area

9.5 These updated housing trajectories will replace those in appendix C to the submitted core strategy.

PART 3: POLICY IMPLICATIONS

Implications for the Spatial Strategy in relation to Housing Market Areas

10.1 The Inspector in his 10th Procedural letter states:

Such a modification would have implications for other parts of the CS, for example, the disaggregation of housing across the three HMAs, the distribution of development within the community areas and the indicative housing land supply. Could you please indicate how the Council would contemplate accommodating such a change?

10.2 NPPF asks that each Local Planning Authority demonstrates that it has five years' supply of deliverable land for new housing. It needs to maintain the supply over future years as development takes place over the Plan period. It is also asks them to boost the supply of housing.

10.3 The disaggregation to Housing Market Areas from the aggregation of community areas accords with the Plan's spatial strategy which has been tested and supported by evidence to show that this represents sustainable development in the County.

10.4 Disaggregation to indicative requirements for settlements and community area remainders provides an indication of the Council's intentions influenced by constraints. By recognising constraints like market realism, infrastructure barriers and environmental constraints the distribution therefore represents a distribution to housing market areas that is the most likely to be able to be delivered.

- 10.5 However, further steps are required to boost housing supply in accordance with national policy and also to ensure that a five year supply of deliverable land can be maintained across the plan period.
- 10.6 The Council needs to identify more land for new housing, which will generally be needed towards the end of the Plan period. The need to identify strategic mixed use sites at Chippenham is an exception to this when sites will be brought forward earlier. A Housing Sites Allocation DPD, alongside the Chippenham Site Allocations DPD, is the main means by which the Council can ensure a five year supply of land can be maintained.
- 10.7 A five year supply of land including an adequate buffer of land provides a choice of opportunities. The Plan also needs to recognise also that although 42,000 new dwellings represents a realistic and achievable target in terms of boosting supply, objectively assessed needs have been considered greater still. An appropriate approach is therefore to frame Housing Market Area requirements as minimum housing requirements.
- 10.8 The HMA housing requirements will remain a floor not a ceiling in order that should proposals for sustainable development over and above these figures come forward, then in accordance with the NPPF, it should be allowed. That is, it remains a permissive plan to sustainable development and as such complies with paragraph 14 of the NPPF.
- 10.9 In this respect although the numbers of the plan have increased significantly, the implications on the strategic approach to housing by market area remains ostensibly the same, as the figures were always minima and the plan would always allow for additional growth to come forward. In short the strategy in this respect remains substantively unchanged.

Implications for the strategic approach to housing numbers within settlements and community area remainders

- 11.1 The Inspector in his 11th Procedural letter states:

'Consequently, I consider that there may be scope for a broader and more flexible approach within the CS towards the disaggregation of housing across community areas within each HMA, particularly as many potential developments may fall to be realised later in the current plan period. Thus the Council may wish to come to a view as to whether prescriptive minimum housing 'targets' for each community area are necessary at this stage.'

- 11.2 NPPF states that neighbourhood plans are the appropriate levels at which communities may articulate a local vision for their area. The Plan provides a strategic context.
- 11.3 The Inspector has highlighted that if the Plan prescribed levels of housing for individual settlements and community area remainders, then this could prove to be inflexible. It could inhibit the Council's ability to ensure that a five year supply of land can be maintained. The Inspector anticipates a likely need for some flexibility in how individual housing sites are to be identified across each HMA, particularly in the latter part of the plan period.

- 11.4 Undue prescription also restricts the scope for local communities to address their own local needs, issues and opportunities in a manner that best matches their local vision for their area. As stated above, the calculation of indicative requirements is determined by the spatial strategy. It also provides some clarity of the Council's intentions in respect of supporting DPDs. However, indicative requirements should not prejudice distinct aspirations and circumstances pertaining to each town and community area. The Plan therefore needs to articulate the flexibility required.
- 11.5 To achieve this flexibility a major modification is proposed to the plan. It is suggested that this can best be achieved by removing 'at least' from all the Community Area policies (Core Policies 4 to 33) and the introduction of 'indicative' figures. The Schedule of modifications submitted with this paper suggests the requisite changes.
- 11.6 The exception to this approach is Core Policy 10 for Chippenham where as explained in paragraph 7.13-14 above it is suggested that the 'at least' is retained in order to reflect its unique treatment within the plan and to set at a minimum to provide the flexibility to allocate sites that can most effectively articulate the most sustainable pattern for the town's long term growth.

Implementation - the integration of DPDs and Neighbourhood Plans

- 12.1 Additional land for housing needs to be identified in order to ensure requirements are met over the plan period. Generally speaking land does not need to be identified for immediate development but once strategic sites are underway additional opportunities will need to come on stream. Sites for housing development will be identified through the DPD being prepared by the Council or by Neighbourhood Plans, prepared by local communities.
- 12.2 These two areas of work need to be integrated in a way that delivers sustainable development and also effectively manages the release of land for development.
- 12.3 Future Housing Land Supply Statements will include an Implementation Plan as required by the NPPF. It will set out the stages reached by the various Neighbourhood Plans, the approximate scale of housing development anticipated that they will deliver and an estimate of when sites will be deliverable. Progress on the Housing Site Allocation DPD will also be reported and as it progresses so too will the scale and timing of housing sites as they emerge. Commentary will provide a forward look on five year supply and may identify steps to ensure housing needs continue to be met.
- 12.4 Additional text should be added to the Plan to refer to this approach.

PART 4: SUGGEST CHANGES TO THE CORE STRATEGY

- 13.1 Suggested changes to the core strategy relate to core policy 2 and community area policies and their related text as set out in the Schedule of Modifications. (EXAM/90)

Area	Is the implied rate of house completions realistic?				Initial realistic requirement	Are there insurmountable infrastructure barriers?		Are there insurmountable environmental constraints?	Redistribution to account for constraints				Final requirement		
	Submission requirement	Submission requirement including proportional growth	Is this less than double historic rates?	Is this achievable considering other factors?		Are there insurmountable infrastructure constraints?	What can be delivered within limits of constraints?		Re-proportioned requirement	Is this less than double historic rates?	Second realistic requirement	Re-proportioned requirement		Is this less than double historic rates?	Third realistic requirement
Devizes town	1730	1932	Yes	Yes	1932	No	No	1932	2002	Yes	2002	2011	Yes	2011	2010
Devizes remainder	420	469	Yes	Yes	469	No	No	469	486	Yes	486	488	Yes	488	490
Marlborough town	610	681	Yes	Yes	681	No	Yes	680	680	Yes	680	680	Yes	680	680
Marlborough remainder	240	268	Yes	Yes	268	No	Yes	240	240	Yes	240	240	Yes	240	240
Pewsey	600	670	Yes	Yes	670	No	Yes	600	600	Yes	600	600	Yes	600	600
Tidworth & Ludgershall	1750	1954	No	No	1750	No	No	1750	1750	No	1750	1750	No	1750	1750
Tidworth remainder	150	168	Yes	Yes	168	No	No	168	174	Yes	174	174	Yes	174	175
East Wiltshire	5500	6143			5938			5839	5932		5932	5944		5944	5945
Amesbury, Bulford & Durrington	2100	2345	Yes	Yes	2345	No	No	2345	2430	Yes	2430	2441	Yes	2441	2440
Amesbury remainder	295	329	Yes	Yes	329	No	No	329	341	Yes	341	343	Yes	343	345
Mere town	200	223	Yes	Yes	223	No	No	223	231	Yes	231	233	Yes	233	235
Mere remainder	50	56	Yes	Yes	56	No	Yes	50	50	Yes	50	50	Yes	50	50
Salisbury City/Wilton town	6060	6768	No	No	6060	No	No	6060	6060	No	6060	6060	No	6060	6060
Wilton remainder	220	246	Yes	Yes	246	No	No	246	255	Yes	255	256	Yes	256	255
Downton town	190	212	Yes	Yes	212	No	Yes	190	190	Yes	190	190	Yes	190	190
Southern Wiltshire remainder	365	408	Yes	Yes	408	No	No	408	422	Yes	422	424	Yes	424	425
Tisbury town	200	223	Yes	Yes	223	No	Yes	200	200	Yes	200	200	Yes	200	200
Tisbury remainder	220	246	No	No	220	No	Yes	220	220	No	220	220	No	220	220
South Wiltshire	9900	11057			10323			10272	10400		10400	10417		10417	10420
Bradford on Avon town	510	570	Yes	Yes	570	No	No	570	590	Yes	590	593	Yes	593	595
Bradford on Avon remainder	160	179	Yes	Yes	179	No	No	179	185	Yes	185	186	Yes	186	185
Calne town	1240	1385	Yes	Yes	1385	No	No	1385	1435	Yes	1435	1442	Yes	1442	1440
Calne remainder	140	156	Yes	Yes	156	No	No	156	162	Yes	162	163	Yes	163	165
Chippenham town	4000	4467	Yes	Yes	4467	No	No	4467	4629	No	4512	4512	No	4512	4510
Chippenham remainder	500	558	Yes	Yes	558	No	No	558	579	Yes	579	581	Yes	581	580
Corsham town	1050	1173	Yes	Yes	1173	No	No	1173	1215	Yes	1215	1221	Yes	1221	1220
Corsham remainder	150	168	Yes	Yes	168	No	No	168	174	Yes	174	174	Yes	174	175
Malmesbury town	760	849	Yes	Yes	849	No	No	849	880	Yes	880	884	Yes	884	885
Malmesbury remainder	440	491	Yes	Yes	491	No	No	491	509	Yes	509	512	Yes	512	510
Melksham town	1930	2156	Yes	Yes	2156	No	No	2156	2234	Yes	2234	2244	Yes	2244	2245
Melksham remainder	110	123	Yes	Yes	123	No	No	123	127	Yes	127	128	Yes	128	130
Royal Wootton Bassett town	920	1028	Yes	Yes	1028	No	No	1028	1065	Yes	1065	1070	Yes	1070	1070
Royal Wootton Bassett & Cricklade remainder	330	369	Yes	Yes	369	No	No	369	382	Yes	382	384	Yes	384	385
Trowbridge town	5860	6545	Yes	Yes	6545	No	No	6545	6782	Yes	6782	6812	Yes	6812	6810
Trowbridge remainder	140	156	Yes	Yes	156	No	No	156	162	Yes	162	163	Yes	163	165
Warminster town	1650	1843	Yes	Yes	1843	No	No	1843	1910	Yes	1910	1918	Yes	1918	1920
Warminster remainder	120	134	Yes	Yes	134	No	No	134	139	Yes	139	140	Yes	140	140
Westbury town	1290	1441	Yes	Yes	1441	No	No	1441	1493	Yes	1493	1500	Yes	1500	1500
Westbury remainder	100	112	Yes	Yes	112	No	No	112	116	Yes	116	116	Yes	116	115
North and West Wiltshire	21400	23901			23901			23901	24768		24650	24740		24740	24745