

Wiltshire Local Plan Review

Swindon Borough Local Plan Review

**Scope of the Plan: Delivery and
Viability**

(Regulation 18 consultation)

**Report of Developer Forum 23rd July
Held at The Civic Centre, Trowbridge**

August 2019

Introduction

Swindon Borough Council and Wiltshire Council are reviewing their respective Local Plans to cover the period 2016 – 2036. The National Planning Policy Framework (NPPF) states that *‘Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary.’*¹ Additionally, local plans should be reviewed at least every five years as a legal requirement under Regulation 10A of the Town and County Planning (Local Planning) (England) Regulations 2012.

Joint Working

Both Councils are committed to working together in the preparation of a Statement of Common Ground to support their respective Local Plan Reviews. The two Councils recently updated their individual Local Development Schemes (LDS) and presented them to their Cabinets. Approval was given at the Swindon Borough Council's Cabinet (20 March 2019²) and Wiltshire Council's Cabinet (26 March 2019³) for the respective LDS'.

A further paper was considered by Wiltshire Council's Cabinet on 30 April 2019 regarding the next steps in the preparation of Wiltshire's Local Plan Review, including a range of housing development options to be tested.⁴ Swindon Borough Council's Cabinet on 10 July 2019 also considered a preferred option and a second Regulation 18 consultation on the proposed Swindon Local Plan Review option began on 29 July 2019.⁵

Delivery and Viability Context

In line with the NPPF and Planning Practice Guidance (PPG) 2019 the role of a viability assessment is primarily at the plan making stage. Furthermore, a viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.

Paragraph 003 of the PPG outlines that when *‘assessing the viability of plans, the individual testing of every site or assurance that individual sites are viable is not required. Plan makers can use site typologies to determine viability at the plan making stage.’*

Paragraph 004 adds ‘A typology approach is a process that can be followed to ensure that authorities are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period’.

A typology approach works on the basic principle that sites that are grouped by shared characteristics can be assumed to have the same average costs and values as to how relevant policies may affect the viability of each type of site. Sites are grouped by characteristics that reflect the nature of typical sites that may be developed within the plan area. Characteristics may include whether the site is brownfield or greenfield, site capacity or density or proposed housing type.

¹ NPPF Paragraph 33

² 20 March <http://ww5.swindon.gov.uk/moderngov/ieListDocuments.aspx?CId=285&MId=9464&Ver=4>

³ 26 March <https://cms.wiltshire.gov.uk/mgAi.aspx?ID=81435>

⁴ 30 April <https://cms.wiltshire.gov.uk/ieListDocuments.aspx?CId=141&MId=12497>

⁵ 10 July <http://ww5.swindon.gov.uk/moderngov/ieListDocuments.aspx?CId=285&MId=9829&Ver=4>

Potential policy requirements can also be considered to aid plan makers in coming to a view on what might be an appropriate benchmark land value and policy requirement for each typology.

In forming these typologies plan makers must engage with landowners, site promoters and developers and compare data from existing case study sites to help ensure that the assumptions of costs and values that are being made for each typology are realistic and accurate.

As part of the ongoing work and in accordance with PPG, housing and commercial developers were invited to attend a forum held on 23 July 2019 at Civic Centre, St Stephen's Place, Trowbridge. As part of this, they were updated on the progress of the Local Plan Review and involved in an interactive session on viability to inform the respective plans.

Workshop

The PPG sets out that it is the responsibility of plan-makers to engage with land owners; developers; and infrastructure and affordable housing providers to secure evidence on costs and values informing the viability assessment at the plan making stage. At the beginning of this engagement the Council ran a Developers Forum event to gather information and discuss key topics that will affect the deliverability and viability of the Local Plan review, from the development community.

An invitation was sent via email on Friday 21 June 2019 and attendance was requested to be registered by Tuesday 16 July 2019.

The invitation was sent to members of the local development community. The invitation list was formed using: the developers listed in the Councils consultation portal 'Objective'; the attendance list from the previous developer's forum in November 2018; the developers involved in the Local Enterprise Partnership (LEP); and developers in the Swindon Borough, the details of which were provided by Swindon Borough Council. A copy of the invitation can be found in **Appendix 1**.

An agenda was provided for all attendees prior to the event. A copy of the agenda can be found in **Appendix 2**. In total 64 delegates attended the event and a list of the businesses and organisations represented is presented in **Appendix 3**. The Forum was organised and facilitated by planning officers from both councils.

The format of the forum was a brief presentation to update the attendees on the progress of the Swindon Local Plan Review and the Wiltshire Local Plan Review. This was followed by two workshop discussions, one on market signals and delivery and the second on engaging in viability. Each of these presentations can be found in **Appendices 4, 5, 6 and 8**.

Upon arrival, the attendees were asked to choose the HMA that they were most interested in between Swindon, Chippenham, Trowbridge and Salisbury. Tables were arranged to accommodate 10 representatives and facilitators were placed at each table to prompt a discussion on the potential growth options in each HMA, as well as some of the barriers or consequences to those levels of growth. A note taker was designated for each table to record the outcomes of the discussions. The levels of growth discussed were taken from the Cabinet papers 30 April 2019 and the following four questions were used to focus the discussion:

1. What are the opportunities/risks associated with the high growth option for town within each HMA?
2. Are there any barriers to the market delivering this scale of growth?
3. What are the opportunities/risks associated with the low growth option for towns within each HMA?
4. Are there any market consequences of delivering this scale of growth?

After a short presentation on viability a second workshop discussion took place on the subject of engaging on viability. The discussion was focussed around three questions:

1. How can you assist us in developing the plan making viability assessment?
2. What factors should be taken into account in developing a typology approach?
3. What existing evidence should be used to inform standardised inputs?

In addition to a Council officer facilitating at each table, a note taker was also delegated to each table. These notes can be found in **Appendix 7** and **Appendix 9**.

Further discussion points have been recorded in **Appendix 9**.

Next Steps and Conclusion

In conclusion, it was found that the main recurring themes relating to market signals and delivery for the high and low growth options were:

- lack of long term delivery of infrastructure needed for growth, the infrastructure requirements should be made clear to ensure sustainable growth throughout the plan period;
- balance/trade-off between employment land and housing land, if employment land is not delivered alongside housing land then employment prospects will be reduced and growth will not be sustainable;
- affordable housing provision being met, if low growth options are chosen then affordable housing targets will not be achieved;
- timescales for the delivery of sites are important across the plan period as delivery rates will change over time;
- section 106 and Community Infrastructure Levy (CIL) contributions should be set out clearly outlined at the outset so developers are aware of the requirements and their effect on viability can be properly assessed to reduce unknown costs, and
- promotion of SME sites to bring forward a mixture of development sites for reasons such as delivery, affordable housing provision and infrastructure delivery

The main points raised from the discussion on engaging in viability are summarised below:

- early and continuous engagement by the Councils with developers throughout the plan making process;
- it was recommended that a range of different sizes of sites should be tested against scenarios and this test should also include employment land of different sizes,
- transparency from all parties will aid the availability of information to inform the standardised input,
- being realistic about the costs to developers, including being aware of the hidden costs e.g. promoting a site and profit margins,

- particular factors that should be taken into account when developing a typology approach are: quantity of affordable housing, affordability ratios, housing price areas, benchmark land values and site size/density, and
- evidence to can be used to inform standardised inputs is as follows; RICS documentations, house and land prices, the costs to schools & roads and recent funding schemes

Attendees were informed that Wiltshire Council would be inviting comments on its Alternative Development Strategies (ADS) until the 31 August 2019. Comments were submitted to spatialplanningpolicy@wiltshire.gov.uk.

The Council invited comments on the ADS as part of a wider informal consultation with Town and Parish Councils and Councillors. The Council's intention to consult was outlined in paragraph 2.9 of the Local Development Scheme 2019⁶.

A summary of the comments submitted can be seen in Appendix 9.

Swindon Borough Council ran a second Regulation 18 consultation from 29 July 2019 until 23 September 2019. Comments were accepted through the Swindon online consultation portal or can be submitted to forwardplanning@swindon.gov.uk.

The views and insights of agents and developers that were captured in the discussions are important to help inform the ongoing review of both plans. Further engagement with the agents and developers is expected following the appointment of a consultant to carry out the viability assessment, in addition to ongoing engagement at key points in the development plan process to inform the completion of draft plans prior to consultation

⁶ 'These changes had implications for joint working with Swindon Borough Council and the subsequent timetable for the local plan review. It is now envisaged that further informal consultation will take place during the Spring and Summer of 2019 as part of ongoing Regulation 18 consultations leading to consultation on a pre-submission draft plan in early 2020 (Regulation 19).'

APPENDIX 1: Invite to Developers/Agents

18th June 2019

Your reference: Local Plan Review forum

Dear Sir/Madam

Swindon Borough and Wiltshire Council Local Plan Reviews 2016 to 2036: Invitation to developer's forum - 23 July 2019

Swindon Borough Council and Wiltshire Council are reviewing their respective Local Plans to cover the period 2016- 2036.

This involves both Councils working together and the preparation of a Statement of Common Ground. Updated Local Development Schemes including the approach to joint working were recently adopted by Swindon Borough Council's Cabinet ([20 March](#)) and Wiltshire Council's Cabinet ([26 March](#)).

A further paper was considered by Wiltshire Council's Cabinet on 30 April on the next steps in the preparation of Wiltshire's Local Plan Review, including a range of housing development options to be tested. Swindon Borough Council's Cabinet will be considering a preferred options consultation next month.

As part of the ongoing work we would like to invite you to attend a forum for housing and commercial developers to be held 23 July 2019 at Civic Centre, St Stephen's Place, Trowbridge, Wiltshire, BA14 8AH. The purpose of the forum will be to provide an update on progress with the Local Plan Review and to have an interactive session with the development community including a discussion on viability to inform the plan.

The event will take place between 14:00 and 16:00. Please arrive from 13:45 to allow a prompt start at 14:00.

There has been a high demand for places at previous events. Attendance is restricted to one representative from each organisation and to help manage the event attendees must register their attendance by 16 July 2019. To do this please e-mail spatialplanningpolicy@wiltshire.gov.uk or phone 01225 713223 and clarify who you will be representing.

Yours faithfully,

Georgina Clampitt-Dix
Head of Spatial Planning
Economic Development and Planning
Wiltshire Council

Appendix 2: Agenda

Swindon Local Plan Review & Wiltshire Local Plan Review Developers Forum 2019

The purpose of the forum is:

- to provide an update on progress of the respective Local Plan Reviews,
- to consider market signals and delivery rates as a factor in identifying reasonable levels of growth and sites, and
- to begin a discussion about viability assessment at a plan level.
- please arrive at 13:45, for a prompt start at 14:00

Agenda

1. Welcome
2. Update on Swindon Borough Plan review
3. Update on Wiltshire Local Plan Review
4. Discussion 1: market signals and delivery

Workshop session on tables to discuss the growth options for towns within each of the four HMAs (Trowbridge, Swindon, Chippenham, Salisbury) (please see Wiltshire Council cabinet of [30 April 2019](#) and Swindon Borough Council Cabinet of [11 June 2019](#))

- What are the opportunities/risks associated with the high growth option for towns within each HMA?
- Are there any barriers to the market delivering the scale of growth?
- What are the opportunities/risks associated with the low growth option for towns within each HMA?
- Are there any market consequences of delivering this scale?

5. Discussion 2: engaging in viability

Workshop session on tables to discuss plan making and viability.

- How can you assist us in developing the plan making viability assessment?
- What factors should be taken into account in developing a typology approach?
- What existing evidence should be used to inform standardised inputs?

6. Next steps

APPENDIX 3: List of Invitees and Attendees

Attendees are shown in highlighted text.

Organisation	Organisation
1 Countryside Solutions	Blount & Maslin
Abbey Homes	Blue Yonder
Adams Integra	Bluestone Planning
AECOMLtd	BNP Paribas
Aistone Properties Ltd	Bovis Homes Limited (Wessex Region)
Alder King LLP	Bovis Homes Ltd South West Region
AlderKing Planning Consultants	Boyer Planning Ltd
Alpha Design Ltd	Brackley Investments Ltd
Alpha Properties	Braemon Holdings
AMEC	Brimble Lea and Partners
Andrew Fleming Associates	Brimble, Lea & Partners
Annington Property Ltd	Broadway Malyan 3 Weybridge Business Park
Archway Projects	Brook Chartered Surveyors
Arcus Consulting	Brooke Smith Planning
Aricab	Bryan Jezeph Consultancy
Ashely Design	McLoughlin Planning
Ashford Homes	c/o Telow King
Aspect Ecology Ltd	c/o Tetlow King Planning
Asset Optimal	Cabot Trustees Ltd
ATKINS Limited	Carter Jonas LLP
Atwell Martin	Castleoak Care Developments
Baker Estates	Catesby Estates Plc
Ball Family Trust	CBRE Ltd
Barratt Homes	CgMs Limited
Barton Wilmore Planning	Charterhouse Property Group LLP
BBA Architects	Chesterton Humberts
Beard Swindon	Chippenham 2020 LLP
Bell Cornwell LLP	Christopher Wickham Associates
Bellway Homes	CJH Land Limited
Bellway Homes Wessex	Clark and Maslin
Benchmark Development Planning Ltd	Cole Easdon Consultants
Bennett Architectural Designs	Collier Planning
Bernard E Cole & Partner	Colliers CRE
Bill Lowe Ltd	Connells
Blake Kerry Architects	Consult QRD
Bloor Homes	Cooper & Tanner
Bloor Homes Southern	Cooper and Tanner
Boyer Planning	Chapman Lily Planning Ltd
Charterhouse Strategic Land	Cherrington Planning Consultancy
Claremont Planning	LVA LLP
Cousins Thomas Rose Associates	Fairhurst & Partners
Cranford Developments	Fennell Property
Crest Nicholson	Fielder & Jones
Crest Nicholson South West Ltd	Fiona Jury Planning
CSJ Brooke Smith	Fisher German Chatered Surveyors
CSJ Planning Consultants Ltd	Fisher German LLP

Cushman & Wakefield Healey & Baker	FJ Planning
D. K. Symes Associates	Fowler Architecture & Planning Ltd
Damen Associates Ltd	FOWLER ARCHITECTURE AND PLANNING LIMITED
David Arms Associates	FPD Savills
David Jarvis Associates	Framptons
David Lock & Associates	Framptons Planning
David Lock Associates Ltd	Fusion Online Ltd
David Wilson Homes Southern	Future Land
Davies & Co.	G L Hearn Planning
DC Planning Limited	Gaiger Bros
Defence Estates	Gallagher Estates
Defence Infrastructure Organisation	GFL Developments Ltd
Dev Plan	Giles ,Wheeler-Bennett
Devizes Development Partnership	Gillespies Ltd
Devizes Development Partnership/ Croft Mr R	GL Hearn Ltd
DevPlan UK	GL Hearn representing Gregory's
Dolmansurveyor S	Gladman Developments Ltd
Doric Developments (Bath) Ltd	Glasson Planning
Dorothy House Hospice	Gleeson Strategic Land Ltd
DPDS Consulting	Goadsby and Harding Commercial
DPDS Consulting Group	Goadsby Planning and Environment
Duchy of Cornwall	Green Issues
E A Lush	Green Square Goup
Eagle One Limited	GVA
Ecology Solutions	GVA Grimley Limited
Elkins Architects Ltd	Hallam Land Management Ltd
Emery Planning Partnership	Halsall Homes
Enderby Associates	Hamptons International
Entec UK Ltd	Hannick Homes & Developments Ltd
Environmental Gain Ltd	Harris Lamb
ESA Planning	Henry Adams Planning Ltd
ESA Planning for Salisbury S.A.R.L	Heritage Planning Services
European Metal Recycling Limited	Heron Land Developments Limited
Heynes Planning	Mono Consultants Ltd
Hills HomesGroup	Moore, Allen & Innocent LLP
Hollins Strategic Land	Nexus Planning
Hollins Strategic Land	Charles Church
Home Builders Federation	Durrington Square Limited
Hopwood & Swallow	Murdoch Planning
HPH LTD	Myddelton and Major
HPH Ltd.	Nathaniel Lichfield and Partners
Hungerford Land Ltd	National Grid
Hunter Page Planning Ltd	Nigel Lilley Architectural Consultant
Impact Planning Services Ltd	NJL Consulting
Indigo Landscape Architects Ltd	Nonsuch House Property Company
Indigo Planning Limited	North Chippenham Consortium - (Barratt Strategic, Heron Land and Persimmon Homes)
JM Stratton & Co	Northern Trust
John Lippett Architects	Oakley Planning & Conservation
Kavanaghs (Residential & Commerical Agents) Ltd	Oriel Homes

Kemp & Kemp Property Consultants	Origin3
Kernon Countryside Developments	Pacey Land and Development
Keron Countryside Consultants	Paul Sharpe Associates
King Sturge	PB World Consulting
Lambert Smith Hampton	Peacock & Smith
Land & Mineral Management Ltd	Pegasus Group
Land Development & Planning Consultants Ltd	Pegasus Planning Group
Land User Consultants	Persimmon Homes
Land Value Alliances	Persimmon Homes (Wessex)
LCP (Trull)	Persimmon Homes South Coast
LDPC Ltd	Peter Kent Architect
Leith Planning Ltd	Pinsent Masons
Lewisplanning.C O	Plainview Planning Ltd
Lichfields	Plan Info
Lightwood	Princeton Land
Linden Homes	Planning Bureau for McCarthy and Stone
Linden Homes Thames Valley	Planning Bureau Ltd
Linden Homes Western Limited	Planning Issues Ltd
Lobster and Partners	PlanningSphere Ltd
LP Planning	Planware Ltd
LPC (Trull) Ltd	Positive Planning
M J Gleeson Group plc	Primegate Properties (Hooknorth)Ltd
M7 Planning	Premier Design (Wiltshire) Ltd
Maclaren Property Limited	Woods
Marrons Planning	Princeton Homes
Michael Lyons Architecture	Pro Vision Planning and Design
Michael Trentham Architects	Project Allenby Connaughtâ€™s
Prospect Land Ltd	Taylor Wimpey Strategic Land
Qdos Homes Ltd	Terence O'Rourke Ltd
Quartley Surveyors	Tesni Properties Limited
Quattro Design	Tetlow King
R Pearce and Partners	TETLOW KING PLANNING
Raymond Brown Minerals and Recycling Ltd	Thakeham
Redcliffe Homes	The Bell Cornwell Partnership
Redrow Homes	The Co-operative Estates
Richborough Estates	The Orders of St John Care Trust
rk architecture	Thomas Homes
Robert Brett & Sons Limited	Transition Community Corsham
Robert Hitchins Ltd	Troy Planning and Design
Rolfe Judd Planning	Turley Associates
RPS Group	Vail Wil
RPS Planning and Development	Vincent and Gorbing
RPS Swindon	Vivera Property Ventures Ltd
Rural Solutions Consulting Ltd	W A Fairhurst & Partners
Sanderson Weatherall	Wainhomes (South West) Holdings Ltd
Savills	WebbPaton
Savills Planning	Nexus Planning
Savills-Smiths Gore	West Wiltshire Housing Society
SF Planning Link Ltd	Westbuild Homes
Shepperton Homes	Westlea
Slade Smith & Winrow	Westlea Housing Association

SLR Consulting Ltd	White Design Associates
Smiths Gore	White Young Green
Sonning	Welbeck Strategic Land
South West RSL Planning Consortium	Whitmarsh Lockhart
Southern Planning Practice Ltd	Wiltshire Building Design Association
Sovereign	Wiltshire Council
Spitfire Properties LLP	WK Architects
St Modwen Properties	Woolley & Wallis
Star Planning and Development	WRE Draper
Stow Associates Ltd	Wyatt Homes
Strakers	Ashley Design
Strategic Land Partnerships	D2 Planning Ltd
Strutt & Parker	PureTown Planning
Sustainable Relations Ltd	Emery Planning
Taylor Wimpey	Stephen Hinsley Planning
Waddleton Park Ltd	Rectory Homes

APPENDIX 4: Presentation on Swindon LPR Update

Swindon Borough Local Plan Review

2nd Reg. 18 Consultation to commence 29th July

- Emerging Spatial Options – for public comment and testing
- 'Refresh' of DM policies

Comments by 23rd September 2019

Planning Policy



Swindon Borough Local Plan Review

- Annual housing requirement 1,080
- Residual Requirement of c1000 dwellings beyond existing commitments and assumptions
- No unmet need for housing
- 4 broad spatial options for delivering identified need

Planning Policy



Swindon Borough Local Plan Review

- Additional office requirement 16,000sqm to 67,700sqm
- Additional industrial land – up to 56.7ha
- Sufficient supply – but need to address
 - short term supply issues
 - quality
 - strategic inward investment opportunities
- Honda?

Planning Policy



Swindon Borough Local Plan Review

DM policies:

- Removal of 'Core Strategy' legacy policies
- Supersede Swindon CAAP
 - Design and Space Standards
 - Accessible and Specialist Housing
 - Parking Standards SPD

Planning Policy



- On line consultation portal (need to register first)
<https://swindon-consult.objective.co.uk/portal/>

- You can email the Planning Policy team at:
forwardplanning@swindon.gov.uk

- Send written comments to SBC Planning, Wat Tyler House, Beckhampton Street, Swindon SN1 2JH.

Planning Policy



Swindon Borough Local Plan Review

Public Consultation on Pre-submission (Regulation 19)	Winter 2019/20
Submission to Secretary of State (Regulation 22)	During Q2 2020
Examination in Public (Regulation 24)	Commences Q3 2020
Inspector's Report (Regulation 25)	During Q4 2020
Adoption (Regulation 26)	During Q1 2021

Planning Policy



APPENDIX 5: Presentation on Wiltshire LPR Update

Wiltshire Local Plan Review Update

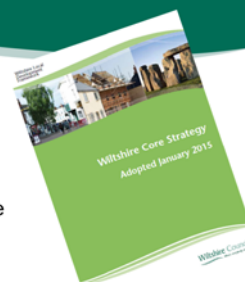
July 2019



Wiltshire Council
Where everybody matters

Current timetable

- Draft plan by early 2020
- Submission to Secretary of State by end 2020
- Adoption autumn 2021



Wiltshire Council
Where everybody matters

What has been agreed so far?

- Plan for a local housing need range between 40,840 and 45,600 for the period 2016-2036. Residual about 18,000 homes
- Plan for an employment land requirement of about 182 ha for the period 2016-2036. Residual about 26 ha
- Revised Housing Market Area boundaries

Wiltshire Council
Where everybody matters

What has been agreed so far?

- Plan for a local housing need range between 40,840 and 45,600 for the period 2016-2036. Residual about 18,000 homes
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The Challenge

How can we disaggregate the proposed housing and employment requirements to individual principal settlements and market towns?



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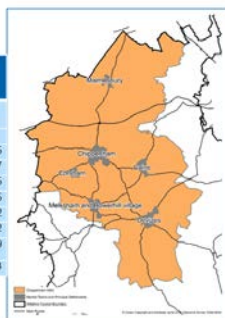
Housing Market Areas

	Wiltshire Core Strategy (2006-2026)	Government Standard Method (2016-2036)	2019 SHMA review (2016-2036)
WILTSHIRE UA	42,000	40,840	45,600
CHIPPENHAM HMA	14,300	13,630	20,390
SALISBURY HMA	12,350	12,230	10,975
SWINDON HMA (part)	3,850	4,480	3,260
TROWBRIDGE HMA	11,500	10,500	10,995

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Chippenham Housing Market Area

Principal Settlements/Market Town	Wiltshire Core Strategy 2006-2026		Rolling Forward for 2016 - 2036	
	Housing Dwellings	Employment Hectares	Housing Dwellings	Employment Hectares
Calne	1440	6	2050	5.5
Chippenham	4510	28	6440	25.7
Corsham	1220	6	1740	5.5
Devizes	2010	9.9	2870	5.5
Malmesbury	885	5	1260	7.2
Melksham	2240	8	3200	7.2
Rest of HMA	1992	1.6	2840	2.9
Total	14365	62.5	20400	61.4



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Chippenham HMA Alternatives to rolling forward the WCS

Chippenham Housing Market Area

Officer judgement using evidence and following 2017 and 2018 consultation		
Chippenham	Higher	Consider higher levels of growth due to economic prospects and need for infrastructure investment. Less environmental constraints.
Melksham		
Calne	Lower	Consider lower levels of growth due to environmental constraints, with exception of Calne where economic prospects don't match scale of housing.
Corsham		
Devizes		
Malmesbury		
Rest of HMA	Higher	Employment prospects, past trends and housing needs all suggest higher scales of development.

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Chippenham HMA: Alternative development strategies

CH-A		WCS (2006-2026)	Additional Dwellings (2018-2036)	
Roll forward the core strategy			Dwellings	
Employment: Calne, Corsham, Melksham			Min	Max
CH-B	Chippenham HMA			
Chippenham Expanded Community	Calne	1440	250	860
Employment: Chippenham, Calne	Chippenham	4510	1830	5155
CH-C	Corsham	1220	745	1265
Melksham Focus	Devizes	2010	1165	2025
Employment: Melksham, Corsham	Malmesbury	885	340	715
	Melksham	2240	890	2600
	Rest of HMA	1992	1420	1470

Wiltshire Council
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Salisbury Housing Market Area

Principal Settlements/Market Town	Wiltshire Core Strategy 2006-2026		Rolling Forward for 2016 - 2036	
	Housing Dwellings	Employment Hectares	Housing Dwellings	Employment Hectares
Salisbury/Wilton	6060	28	5390	28.8
Tidworth/Ludgershall	1750	12	1555	12
Amesbury	2440	7	2170	7.2
Rest of HMA	2090	11.4	1860	11.7
Total	12340	58.4	10965	60



Wiltshire Council
Where everybody matters

Salisbury HMA: Alternatives to rolling forward the WCS

Salisbury Housing Market Area		
Officer judgement using evidence and following 2018 consultation		
Salisbury/Wilton	Higher	Consider higher levels of growth due to economic prospects and need for affordable housing.
Amesbury	Lower	Consider lower levels of growth due to environmental constraints at Amesbury, and economic forecasts and housing needs at Tidworth and Ludgershall
Tidworth and Ludgershall		
Rest of HMA	Higher	Employment prospects, past trends and housing needs all suggest higher scales of development.

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Salisbury HMA Alternative development strategies

SA-A		WCS (2006-2026)	Additional Dwellings (2018-2036)	
Roll forward the core strategy			Dwellings	
Employment: Salisbury, Tidworth			Min	Max
SA-B	Salisbury HMA			
Focus on Salisbury	Salisbury/Wilton	6,060	0	1,750
Employment: Salisbury	Amesbury	2,440	0	940
SA-C	Tidworth/Ludgershall	1,750	0	345
Focus on the rest of the HMA	Rest of HMA	2,090	745	2,255
Employment: Trend based				
SA-D	Boscombe/Porton New Community			
Employment: Boscombe/Porton				

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Swindon Housing Market Area

Principal Settlement/Market Town	Wiltshire Core Strategy 2006-2026		Rolling Forward for 2016 - 2036	
	Housing Dwellings	Employment Hectares	Housing Dwellings	Employment Hectares
Marlborough	680	3	570	4.3
Royal Wootton Bassett	1070	3.7	900	5.3
West of Swindon	900	0	755	0
Rest of HMA	1225	1	1030	1.4
Total	3875	7.7	3255	11



Swindon HMA (Wilts): Alternatives to rolling forward the WCS

Swindon Housing Market Area		
		Officer judgement using evidence and following 2017 and 2018 consultation
Marlborough	Lower	Consider lower levels of growth due to economic prospects and possible environmental impacts
Royal Wootton Bassett	Higher	Consider a lower growth alternative. However to address infrastructure constraints a higher growth alternative should be tested also.
West of Swindon	Lower	Based on no unmet needs from Swindon Borough, there is a justification for lower rates of growth
Rest of HMA	Higher	Employment prospects, past trends and housing needs all suggest higher scales of development.

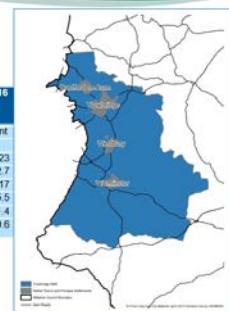
Swindon HMA (Wilts): Alternative development strategies

SW-A Roll forward the core strategy Employment: RWB, Marlborough
SW-B Focus on Royal Wotton Bassett Employment: RWB
SW-C Focus on the rest of the HMA Employment: Marlborough

	WCS (2006-2036)	Additional Dwellings (2018-2036)	
		Dwellings	
		Min	Max
Swindon HMA			
Marlborough	680	50	245
Royal Wotton Bassett	1,070	605	1,025
West of Swindon	900	0	270
Rest of HMA	1,225	360	585

Trowbridge Housing Market Area

Principal Settlement/Market Town	Wiltshire Core Strategy 2006-2026		Rolling Forward for 2016 - 2036	
	Housing Dwellings	Employment Hectares	Housing Dwellings	Employment Hectares
Trowbridge	6810	25	6520	23
Bradford on Avon	595	3	570	2.7
Westbury	1500	18.5	1435	17
Warminster	1920	6	1840	5.5
Rest of HMA	663	3	635	1.4
Total	11488	55.5	11000	49.6



Trowbridge HMA: Alternatives to rolling forward the WCS

Trowbridge Housing Market Area		
		Officer judgement using evidence and following 2018 consultation
Bradford on Avon	Lower	Consider lower levels of growth due to environmental constraints
Trowbridge	Lower	Lower levels of growth alternatives suggested by a majority of indicators, including environmental constraints.
Warminster	Lower	Consider lower levels of growth due to environmental constraints and infrastructure capacity
Westbury	Higher	Relatively less environmentally constrained than other settlements in the HMA and economic prospects.
Rest of HMA	Higher	Past trends and housing needs all suggest higher scales of development.

Trowbridge HMA: Alternative development strategies

TR-A Roll forward the core strategy
TR-B Westbury Growth Point
TR-C Focus on the rest of the HMA

NB: Given existing commitments for employment the residual of 1ha of land needed does not have an impact on the different strategies

	WCS (2006-2036)	Additional Dwellings (2018-2036)	
		Dwellings	
		Min	Max
Trowbridge HMA			
Trowbridge	6,810	1,805	2,930
Bradford on Avon	595	40	310
Westbury	1,500	330	1,025
Warminster	1,920	45	160
Rest of HMA	950	255	820

APPENDIX 6: Presentation on Market Signals and Delivery

Discussion 1: market signals and delivery

*The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, **and take into account relevant market signals.***

NPPF para 31

Discussion 1: market signals and delivery

Feedback

- One point from each table against each question

APPENDIX 7: Notes taken during discussion of Market Signal and Delivery

What are the opportunities/risks associated with the high growth option in towns in each HMA?		
Trowbridge HMA	<p>Opportunities –</p> <ul style="list-style-type: none"> • Residual numbers are more easily met • There is a greater chance of delivering employment land as well as housing • The nature of employment land could be changed from big buildings on hundreds of acres, not using smaller sites • An opportunity to promote growth at large villages as home-working becomes more common • A mixture of sites can be brought forward for development • SME sites can be brought forward for development • Increased employment opportunities in Westbury • Opportunity for green belt land to be released? 	<p>Risks –</p> <ul style="list-style-type: none"> • Levels of high growth are a risk as striving to hit the residual target could result in growth being unfairly distributed or occurring in the wrong place • It may be difficult to promote/retain larger sites for employment land as a higher growth option would result in them being promoted for housing land (a housing vs employment trade-off) • With the move to electric cars and a move away from traditional working, caution must be taken to developing traditional town centres • Can the higher rates of growth be delivered? • Will housing be delivered at the rate that it was proposed, currently housing is not being delivered at the same rate • Can infrastructure be delivered at the rate that will support the higher growth option •
Chippenham HMA	<p>Opportunities -</p> <ul style="list-style-type: none"> • High growth in Melksham and Chippenham would aid in the delivery of key infrastructure • High levels of growth can result in the delivery of a good balance of economic growth - employment and housing land • Could present an opportunity to grow Corsham and justify reopening the train station • A good balance of small, medium and large sites can be put forward for development • Delivery of a range of sites not just strategic large sites, as this may slow development • A clear threshold for social infrastructure requirements can be agreed early on in the process so that it can be taken into consideration earlier on in the planning application process • Devizes has capacity to grow, subject to infrastructure investment 	<p>Risks -</p> <ul style="list-style-type: none"> • There are many environmental and heritage constraints across the HMA – Bats SAC, AONB, Heritage assets • Devizes needs investment to deliver the higher growth option of 2026. • If neighbourhood planning groups were to take on planning for any level of growth, would that risk delays and not delivering on time (5-year housing land supply) • Social infrastructure concerns were highlighted – including the fact that schools cannot keep expanding. Social infrastructure must be considered at the beginning of the process rather than being added on after allocations have been planned

	<ul style="list-style-type: none"> Relieve congestion in Chippenham 	
Salisbury HMA	<p>Opportunities –</p> <ul style="list-style-type: none"> There may be more better opportunities in a pool of land than in the SHELAA Distribution of a mixture of SME sites to meet housing requirements 	<p>Risks –</p> <ul style="list-style-type: none"> The new settlement is not developer led
Swindon HMA	<p>Opportunities –</p> <ul style="list-style-type: none"> Greater affordable housing provision Infrastructure delivery e.g. medical centres, primary school, sports pitches, school and provision of land for such purposes Supporting the sustainability of small settlements and town centres regeneration Assisting Swindon town to fulfil its strategic role within the borough and Wiltshire Delivering the higher growth option for Royal Wootton Bassett means that infrastructure and employment needs can be met, highway improvements also Neighbourhood Plans can allocate sites at large villages which adds a social market value to settlements 	<p>Risks –</p> <ul style="list-style-type: none"> Need to ensure that Swindon carries on delivering strategic growth. Non-aspirational growth in new local plan No-aspirational growth figures leading to lack of employment growth also Public reaction in terms of risks - neighbourhood planning. Policy/plan needs to give clear indication of allocations (including clarity around numbers of homes required at smaller settlements) rather than general 'rest of HMA' etc. This will give NP groups something concrete to plan positively for and encourage them to allocate sites. In Chippenham few allocations are delivered as they are constrained by viability or the size of allocations The character of RWB could be lost if growth is not managed The electrification of the line to London means more commuting The dispersal of development risks not delivering the infrastructure required

Are there any barriers to the market delivering this scale of growth?	
Trowbridge HMA	<ul style="list-style-type: none"> • The Bath and Bradford on Avon Bats SAC is a constraint in the area. The buffer zones that are proposed in the Trowbridge Bat Mitigation Strategy (TBMS) and the green corridors result in a loss of developable area for developers • A Warminster urban expansion would pose difficult to deliver due to flood risk, phosphate issues, biodiversity, the WHSAP sites being delivered and would require a bypass • Bradford on Avon is constrained by the green belt, floods, no bypass, local objection is holding back delivery, emergence of a neighbourhood plan and affordability • Westbury - less constrained, air quality issues, objections and pushback from Town Council, has anything gone wrong from these levels of growth?
Chippenham HMA	<ul style="list-style-type: none"> • Sites that are promoted by individuals may be more problematic to deliver and will need more communication and therefore sites promoted through the SHELAA should be prioritised for development • Infrastructure needs are a issue across the HMA, suggested that early engagement with developers is needed to understand the infrastructure requirements • Corsham constrained is subject to historic and environmental constraints • The rest of the Chippenham HMA towns are less constrained by the market • Delivering the required infrastructure within this plan period may be challenging and a barrier to housing delivery within the plan period • Highway infrastructure and getting the improvements done within the plan period • Financial implications of delivering the required infrastructure – highlighted that funding should be secured at the outset • With the above in mind, maybe think longer term than 2036 to enable the housing to be sufficient and the infrastructure delivery to be sufficient/funded through development
Salisbury HMA	<ul style="list-style-type: none"> • Infrastructure payments (CIL and section 106) • Deliverability • Research into SME's – Drummond Park has led to lower growth in area, relative to the constraints posed at the allocation stage
Swindon HMA	<ul style="list-style-type: none"> • Neighbourhood Planning and local interest groups – there needs to be a balance between local needs and development needs • Local government resources – speed of processing applications is negatively affected by lack of resource • Highway authority and Highways England – difficult and slow to engage with resulting in delays to planning process. They need to be encouraged to collaborate more effectively • Lack of trust in consultation process from the public – need to give clear policy direction and clarity and public need to be involved at earliest possible stage in the process • Lack of political commitment and elected member buy-in • Larger allocations slower delivery. Need a mix of different sites • Planning constraints oat large villages • Marlborough is located in an AONB and has road network constraints but has a strong employment market

What are the opportunities/risks associated with a low growth option in towns in each HMA?		
Trowbridge HMA	<p>Opportunities -</p> <ul style="list-style-type: none"> • More growth can be placed in the rest of the HMA, to offset the issues in Bradford on Avon, Trowbridge and Warminster • SME sites can be suitable for the low growth option • Section 106 and CIL can be used to contribute to development of sites • Smaller sites are more deliverable and therefore may speed up delivery 	<p>Risks -</p> <ul style="list-style-type: none"> • Does not ensure the sustainability of settlements as growth may be too low to be sustainable • Affordability is not resolved by lower levels of housing built and lower growth targets will affect affordable housing numbers
Chippenham HMA	<p>Opportunities -</p> <ul style="list-style-type: none"> • Growth can be aligned with the LEPs objectives and funding can be provided • Smaller developers are able to contribute as there is a mixture of large, medium and small sites required 	<p>Risks –</p> <ul style="list-style-type: none"> • Affordable housing is less likely and infrastructure may not be delivered alongside development • Out-commuting is more likely • The lower number may be seen as a maximum housing requirement and as a result will be seen as not proactive
Salisbury HMA	<p>Opportunities –</p> <ul style="list-style-type: none"> • No pressure on the service networks that need investment • Implications for housing supply and delivery if a lower scale of growth is adopted 	<p>Risks –</p> <ul style="list-style-type: none"> • If there is a lack of supply of sites then delivery will be slow • It has an impact on the delivery of affordable housing provision
Swindon HMA	<p>Opportunities –</p> <ul style="list-style-type: none"> • Smaller allocations come forward quicker • Will have more public support • Proactive planning at small villages • Larger support for affordable housing (villages are opposite to market opinions) 	<p>Risks –</p> <ul style="list-style-type: none"> • Failure to deliver infrastructure • Failure to meet housing needs and could result in economic decline, would that render the plan unsound?

Are there any consequences to delivering this level of growth?	
Trowbridge HMA	<ul style="list-style-type: none"> • For a county the size of Wiltshire, SME sites can be a nightmare • The low growth option may have an effect on the regeneration of town centres
Chippenham HMA	<ul style="list-style-type: none"> • Affordable housing and infrastructure may not be delivered alongside housing growth • Targets will not be met for affordable housing
Salisbury HMA	<ul style="list-style-type: none"> • Not supporting town centres and local businesses • Not delivering infrastructure and affordable housing provision • No dealing with transport network issues as smaller sites don't provide infrastructure investment
Swindon HMA	<ul style="list-style-type: none"> • Higher house prices if demand exceeds supply • Allocations need to be spread more broadly to include regional and local housebuilders as there are not enough opportunities for smaller organisations • There needs to be a range and mix (of sizes, locations etc) of sites allocated as the larger sites take longer to deliver and ensure infrastructure is provided but smaller sites can be completed quicker by smaller building companies

APPENDIX 8: Presentation on Viability

Swindon and Wiltshire

Developers Forum July 2019

Plan Making & Viability




Swindon and Wiltshire


Developers Forum July 2019



Viability

Value generated vs Cost of developing

Aims of the planning system when granting permission to secure maximum benefits in the public interest

Developer and landowner aspirations. Risk vs reward



Swindon and Wiltshire

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Plan Making

34. Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.






Swindon and Wiltshire

Developers Forum July 2019


NPPG advice for local authority:
'The role of viability assessment is primarily at the plan making stage.'

Aim is to ensure that policy obligations are sufficiently clear and certain so that they can be accounted for in the price paid for land.

Policy requirements, particularly for affordable housing should:

- Be set at a level that takes account of needs
- Allow for planned types of sites and development to be deliverable
- Without the need for VA at decision making stage.

Paragraph: 002 Reference ID: 10-002-20190509




Swindon and Wiltshire

Developers Forum July 2019

NPPG advice for landowners and developers:
'The role of viability assessment is primarily at the plan making stage.'

'The price paid for land is not a relevant justification for failing to accord with relevant policies in the plan'.

Paragraph: 002 Reference ID: 10-002-20190509

In order to establish benchmark land value, plan makers, landowners, developers, infrastructure and affordable housing providers should engage and provide evidence to inform this iterative and collaborative process.

Paragraph: 013 Reference ID: 10-013-20190509




Swindon and Wiltshire

Developers Forum July 2019

Viability Assessment: Engagement

Plan makers should engage with landowners, developers, and infrastructure and affordable housing providers to secure evidence on costs and values to inform viability assessment at the plan making stage.

It is the responsibility of **site promoters** to engage in plan making, take into account any costs including their own profit expectations and risks, and ensure that proposals for development are policy compliant

Paragraph: 002 Reference ID: 10-002-20190509




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Viability Assessment: Typology

"Classification according to general type"

- No requirement to assess individual sites for viability
- Use site typologies to determine viability for sites with shared characteristics (eg location, brownfield/greenfield, size)
- Average costs/values will then be used to assess viability of sites
- Market evidence – cross check
- Potential revision of policy requirements – realistic, deliverable and clear



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Viability Assessment: Standardised Inputs

- Gross development value (GDV)
- Costs (eg build costs (BCIS), finance/loan costs, project contingency costs, reflect market conditions)
- Land Value (not the price paid, excludes 'hope', benchmark land value (BLV), existing use value (EUV), premium to landowner, alternative use value)

Defined in the PPG – paragraphs 011-018



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Viability Assessment: Appropriate evidence

Any viability assessment should be supported by appropriate available evidence informed by engagement with developers, landowners, and infrastructure and affordable housing providers and:

- follow the government's recommended approach
- be proportionate, simple, transparent and publicly available.



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And finally

Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.



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Workshop exercise:

1. How can you assist us in developing the plan making viability assessment?
2. What factors should be taken into account in developing a typology approach?
3. What existing evidence should be used to inform standardised inputs?



APPENDIX 9: Notes taken during discussion on engaging in viability

How can you assist us in developing the plan making viability assessment?

- A range of sites should be tested against different scenarios that include a range of employment land
- Be realistic about profit, be aware of profit trends and be aware that low levels of profit are not acceptable
- Keep in mind the investment in promotion of a site, in addition to all of the other costs
- Take into account developer risk – rewarding risk
- Be aware of the alternative options for a sites development, e.g. solar farm, employment etc
- Assess deliverability over the plan period
- Transparency from all parties about cost
- Ensure that the council is looking forward strategically
- Early engagement about sites and what they can deliver to understand the delivery of sites e.g. the sites constraints
- Be realistic with regards to the 106 requirements
- Drive the use of SMEs for small scale development (smaller sites and more deliverable)
- Delivering strategic infrastructure on all relevant sites to aid the 5-year housing land supply
- Consistency of the figures in the viability process
- Make sure that Wiltshire Council continue to engage with developers rather than establishing the viability methodology and then telling them what we are doing (not engagement)
- Produce a bespoke viability report for Wiltshire Council
- The methodology is only as good as the inputs so get infrastructure providers to input into viability assessment

What factors should be taken into account in developing a typology approach?

- Cost for remediating contaminated sites
- Site density/size
- Greenfield/Brownfield
- Quantity of affordable housing
- House price areas
- All sites are different and sites/costs change over time
- Revenue costs, build costs and abnormal costs
- Benchmark land values – difficult to do through standardised methods
- Development value/option value on the basis of physical difference are reflected
- Affordability Ratios
- The sensitivity testing of a viability report
- Flexibility and review of the thresholds need to be built into the assessment
- Look at greenfield sites that have come forward and look at which ones have need viability assessments etc. as this many assist the formation of typologies
- When allocating sites it is useful to be aware of the alternative options for a site, e.g. can it be used for renewable energy such as a solar farm

What existing evidence should be used to inform standardised inputs?

- Costs to schools, roads
- Any recent schemes that may apply
- Agents/landowners to give house/land prices for comparisons
- Speaking to registered providers about values
- Historic Section 106 & deliverability data
- Sales data
- Check the authenticity of the data – e.g. check Section 106 & CIL monies was spent on what it was allocated for
- RICS documentation – red book & viability
- Historic valuation/viability exercises

APPENDIX 10: Additional Discussion Points

During the discussions a number of additional points were raised by attendees, these points were as follows:

- Engagement with industry is key throughout the process – get inputs from the industry about what is taking place on the ground
- There is a funding gap between housing and schools in the Trowbridge area (there should be Section 106 contributions to schools)
- Neighbourhood Planning needs to work in tandem with the Local Plan to best deliver the 5-year housing land supply
- Developers expressed the view that requirements and thresholds must be flexible to change over time to reflect the changes in the market
- There is the potential for a railway station at Royal Wootton Bassett because of its proximity to Swindon. Strategic development could make this a possibility.
- Developers need to be kept informed early what the policy requirements will be to give an accurate information for the viability assessment
- Funding allocated through Section 106 or CIL should be checked to ensure monies allocated have been spent correctly
- The strategic infrastructure needs for each settlement should be clearly outlined, for example, education need or transport network infrastructure The typology approach received a negative reaction for the following reasons:
 - the viability assessment is very costly due to typology
 - the typology approach does not correlate with plan level assessments
 - it is a time-consuming approach

Appendix 11: A Summary of the Additional Comments Submitted on the Alternative Development Strategies ADS

A summary of the comments submitted by the development community can be seen below. These have been organised by HMA.

HMA: Chippenham HMA		
ADS Option A: Rolling Forward		
	Rep Number	Comment
Support	002	The increase in a housing requirement of 43% is supported, particularly as the growth is in within the Growth Zone and there are many opportunities at the towns in the HMA.
Support	009	Support the strategy as there is higher growth for Melksham however the option CH-C proposed more growth that would make the most of public funding for the A350 and improve the bypass options. Endorses a strategy that would see Melksham to receive at least an additional 2,000 homes (CHA) and CH-C), but consider that a higher number is achievable which would make the most of public funding for the A350 and indeed improve the BCR of the submitted bids.
Support	004	Support higher numbers for Calne indicated in options A and C, alongside Employment allocations in Option A
Object	003	Paragraph 23 of the WLPR cabinet papers states that the evidence indicates that Calne, Corsham, Devizes and Malmesbury have constraints which suggest that proportionately lower housing growth should be considered compared to rolling forward the core strategy.
Object	034	Do not see that the residual figure for Chippenham reflects the Option strategy. This is because, in reality, a very significant proportion of the Core Strategy quantum for Chippenham will not have been delivered by 2016, and, indeed, may well not have been built by the current plan horizon of 2026 either.
Object	037	The Council's least favoured options
HMA: Chippenham HMA		
ADS Option B: Chippenham		
	Rep Number	Comment
Support	003	Housing Option CH-B Chippenham is the most appropriate of the Alternative Options, it maximises the chances of meeting the FOAN for the District, is within the most sustainable location and is not significantly environmentally constrained.
Support	010	Supportive of the Council's growth aspirations, particularly Alternative Growth Strategy CH-B. Chippenham is the Principal Settlement in the Chippenham HMA and is the most inherently sustainable, as a result of having the largest provision of services, facilities and connectivity. This existing infrastructure could help to accommodate additional

		growth therefore directing development to the Chippenham area would be the most sustainable Alternative Growth Strategy.
Support	037	The Council's most favoured option
Object	002,006	The focus of the growth is on Chippenham, which up until recently has not been delivered in accordance with the Core Strategy and until the Chippenham Site Allocations Plan was adopted there was a shortage of development opportunities. Caution is raised in respect of a Chippenham focussed strategy (Option CH-B) which relies upon levels of delivery not seen previously at Chippenham.
Object	009	The role for Melksham (890 additional homes) that is set out under CH-B (where Chippenham is identified for 5,154 homes). We consider that if a Chippenham focused strategy becomes the preferred strategy that Melksham should still deliver at least 2,000-2,6000 homes.

HMA: Chippenham HMA

ADS Option C: Melksham Focus

	Rep Number	Comment
Support	002, 005, 008	support for the strategy as the focus is on Melksham
Support	005	Melksham is relatively unconstrained in environmental terms.
Support	006	The Melksham focussed strategy (Option CH-C) is supported. Option CH-C identifies an overall housing requirement figure for Devizes of 2,250 across the plan period to 2036, which past trend-based evidence supports.
Support	007	The overarching development strategy put forward through the Wiltshire Local Plan Review should be based on Alternative Development Scenario CH-C, Melksham Focus. Melksham is one of the largest, most sustainable and self-contained market towns in Wiltshire and the Local Plan Review should recognise that Melksham should remain as an important and integral part of the Chippenham HMA strategy.
Support	008	would make the most of public funding for the A350 bypass.
Support	031	Option C Melksham Focus represents the preferred strategy for growth of the Chippenham HMA.
Object	034	The option still proposes a residual quantum of 1400 – 1500 homes in the rest of the HMA which will be challenging to accommodate sustainably. Although does present opportunities.

HMA: Chippenham HMA

General

Object	008	No information was given in support of either of the strategies however an emphasis was made on the lack of formal consultation on the ADS.
Object	034	Expands on Option CH-B to outline that it should

		seek to concentrate development at Chippenham, with opportunities for growth at Melksham also pursued, with significantly lower growth in the Rest of the HMA, focused on high quality bus corridors.
Object	008	Serious concern for the lack of formal consultation on the Alternative Development Strategies, the lack of clarity in the limited Sustainability Appraisal information presented and the limited opportunity to comment further on the Council's intended strategy prior to the Pre-Submission Consultation.
Object	040	Without the opportunity to comment on the Evidence base and plan strategy ahead of the Pre-Submission Plan we have serious concerns about the Council's ability to demonstrate meaningful engagement and consultation on the submission plan.
Object	038	It is considered appropriate to test a lower rate of growth for Malmesbury. Malmesbury has significant in-commuting, with a major employer in the town employing 4,5000 people.
Support	038	In all scenarios Chippenham itself is identified for significant growth which given it is a principle settlement is appropriate with the three scenarios giving residual requirements for Chippenham between 1829 and 5,151 dwellings.
Support	001	The three development strategies within the consultation document each direct a quantum of growth to Melksham – and this is supported.
	039	Cricklade should be appropriately categorised as a Market Town in the LPR
Object	039	Strategic allocations at Principle Settlements and Market Towns, whilst essentially leaving any rural housing sites to come forward through the Neighbourhood Plans (NPs), is not a sound planning basis for distributing growth in sustainable locations and supporting the rural economy.
Object	038	<p>The housing requirement for Wiltshire is only fixed for two years upon submission of the Local Plan for examination. The housing requirement for Wiltshire will be updated again in March 2020 with the updated affordability ratios and when the updated household projections are published in May 2020. The council must therefore keep the housing requirement under review.</p> <p>In this context it would be prudent for the Council to be working to a higher figure than 45,700 so that the plan progress is not delayed when the revised methodology resulting in higher requirements are published later next year.</p>

HMA: Salisbury HMA**ADS Option 1: Rolling Forward**

	Rep Number	Comment
Support	014	Opinion that the primary location for growth within the Salisbury Housing Market Area is to locate growth within or on the edge of Salisbury/Wilton.
Support	013	The strategy should recognise the role of Salisbury as a Principal settlement and its potential to accommodate a level of growth that is greater than that associated with the rolling forward of the CS distribution of growth. The Salisbury-led approach does this, and will support the hospital plans which will include the provision of specialist accommodation. It is the most sustainable approach and will ensure that the large proportion of additional population would be in easy access of the enhanced health, education and employment facilities that are to be provided as part of the development project.
Support	012	ADS Salisbury A would contribute towards delivering the established objective for Tidworth/Ludgershall.
Support	012	The rolling forward of the Core Strategy would continue to benefit the established objectives for the area, where the settlements of Tidworth and Ludgershall will have developed their complementary roles. Growth will have reflected the need to create a more balanced community and act as a catalyst to attract inward investment with new employment opportunities complementing those provided by the MoD.
Object	013	The roll forward of the Core Strategy distribution is not robust or adequately evidenced.
Object	014	Within the Salisbury Housing Market Area, Hallam Land is supportive of the commentary that lower levels of growth should now be applied to the settlements of Amesbury, Tidworth and Ludgershall. In addition to the environmental and economic constraints identified, these settlements have, especially Amesbury, experienced significant recent growth and there is a need to allow a period of consolidation. Option SA-A should not, therefore, be pursued.
Object	015	Appendix 5 alludes to concerns whether certain elements of the sub-area could deliver the future requirements in this scenario. Most notably Amesbury would require a further 1,000 units, and with the constraints there (including education) this would seem unrealistic. Persimmon Homes therefore agree with the conclusions of the SA (referred to in the cabinet report) that SA-A is the least preferable

		option.
Object	037	The Council's least favoured option
HMA: Salisbury HMA		
ADS Option 2: Marlborough and West Swindon Focus		
	Rep Number	Comment
Support	014	Supportive of Option SA-B as the appropriate development strategy to carry forward into the Local Plan review for the Salisbury Housing Market Area.
Support	015	Salisbury should be the focus for the majority of major development in the HMA, due to the role it carries as a principal settlement.
Support	017	Support a higher housing and employment number for Salisbury as indicated by Option B given that Salisbury and its surrounding villages i.e. Laverstock, would seem the most logical place to support higher levels of growth given the existing facilities, infrastructure and employment opportunities in place.
Support	011	A higher level of growth is considered appropriate for the Salisbury HMA, especially as Salisbury can support economic growth as reflected in the Employment Land Review.
Object	011	Constrains the scale of growth at Amesbury, Tidworth and Ludgershall to the current level of commitments, the rest of the HMA outside of Salisbury declines and residual is focused on Salisbury.
Object	012	There is no basis upon which a decrease in the number of new homes in the Salisbury HMA by 11%.
Object	012	ADSs Salisbury B, C and D would conflict with the established objective to create a more balanced community to act as a catalyst to attract inward investment at Tidworth/Ludgershall. Housing growth must not be constrained to current commitments.
HMA: Salisbury HMA		
ADS Option 3: Rest of the HMA		
	Rep Number	Comment
Support	017	Support Option C.
Support	019	Support higher housing numbers and employment provision for the Rest of the HMA in Option C.
Object	011	Constrains the scale of growth at Amesbury, Tidworth and Ludgershall to the current level of commitments, the rate to Salisbury declines in accordance with the assessed local housing need – 11% and the balance of housing need is focused on the rural areas.
Object	011	This is the most unsustainable option.
Object	012	ADSs Salisbury B, C and D would conflict with the established objective to create a more balanced community to act as a catalyst to attract inward investment at Tidworth/Ludgershall. Housing growth must not be constrained to current commitments.
Object	013	Focusing growth at smaller settlements in preference to Salisbury is not appropriate as would result in an unsustainable distribution and fail to recognise the status of Salisbury as a Principal settlement.

Object	014	The wide dispersal of growth across other villages and settlements is not a sustainable option. Some limited growth to assist with supporting rural services is something which should be considered to meet a local housing need but ultimately development should be focused on the most sustainable locations, such as the edge of Salisbury. Option SA-C is not a sustainable option to adopt.
HMA: Salisbury HMA		
ADS Option 4: Boscombe/Porton New Community		
Object	012	ADSs Salisbury B, C and D would conflict with the established objective to create a more balanced community to act as a catalyst to attract inward investment at Tidworth/Ludgershall. Housing growth must not be constrained to current commitments.
Object	013	Concerned that new settlement will not come forward at the anticipated rate and that it might undermine the deliverability of the proposed hospital development.
Object	014	Option SA-D refers to the potential for a 'Boscombe/Porton Down New Community'. However, unless or until there are more detailed studies and a robust evidence base is established, this is the poorest option to accommodate growth. Such a community might be well related to some employment opportunities at Porton Down but the new homes would still be in a remote location away from facilities and services. Further, the location of this new community would inevitably, without high quality public transport, necessitate and encourage the use of private vehicle trips to access such facilities and services. It is also unlikely to be viable because significant infrastructure is required to develop a new community.
Object	014	Without additional information it is also not possible to assess any wider environmental impact of a large scale development situated in a remote location.
Object	014	Option SA-D should be discounted.
Object	015	Until a proper assessment of the potential location of a new settlement, including analysis of delivery constraints and sustainability credentials, this option should not be taken forward.
HMA: Salisbury HMA		
General		

Object	011	These options do not provide a significant boost to housing supply as advocated in government policy. The figure is below the adjusted core strategy figure of 12,000 dwellings.
Object	011	In each case no account has been taken of the lapse rates (all commitments have assumed to be delivered etc).
	012	There is no basis upon which a decrease in the number of new homes in the Salisbury HMA by 11%. Instead, the ADSs should be tested on the basis of the LHN of at least 12,501 dwellings.
Object	012	Wiltshire Council should test an alternative option for growth at Tidworth/Ludgershall given the place-based assessment at Table 3 identifying this settlement has the greatest capacity for growth in environmental and infrastructure terms. Testing an option with higher growth for Tidworth/Ludgershall is consistent with the consultation with the town councils that recognised land might exist for 500-600 homes at the settlement.
Object	012	It is important to recognise that commenced developments in the area, such as NE Quadrant, Granby Gardens and Zouch Manor, have been successful and achieved strong completion rates demonstrating that under the right conditions housing delivery in the area is strong.
Object	037	There is little explanation and justification for the various scenarios tested and how the Council assessed and carried out its more favoured options. The Council needs to provide further justification for the various choices it has made and also why it has rejected any tested alternative scenarios.

HMA: Swindon HMA

ADS Option A: Roll forward the Wiltshire Core Strategy distribution of homes and jobs

	Rep Number	Comment
Object	024	Unclear if Marlborough would be able to accommodate a scale of growth derived through rolling forward the current strategy.
Object	024	Marlborough is more constrained than Royal Wootton Bassett.
Object	020	Option is inconsistent with table 4 of Appendix 6 of the Cabinet report, as it proposes growth at Marlborough.
Object	041	<p>This strategy is an overly simplistic approach and does not address a number of concerns in respect of Royal Wootton Bassett. These concerns include the need for infrastructure investment and the press need for affordable housing, which has failed to be addressed in the past despite the relatively high level of housing development within Royal Wootton Bassett.</p> <p>Under Strategy SW-A, there would theoretically be a reduction of housing provision at Royal Wootton Bassett. This could potentially result in an effective moratorium on any further housing development between 2026 and 2036.</p>

HMA: Swindon HMA

ADS Option B: Focus on Royal Wootton Bassett

	Rep Number	Comment
Support	024	Consider Royal Wootton Bassett to be a sustainable location as a growth point.
Support	024	Additional development in Royal Wootton Bassett would support a greater range of facilities and jobs.
Support	041	<p>The strategy represents the most appropriate strategy for the Swindon HMA (Wiltshire part), which would see the balance of housing and employment focused on Royal Wootton Bassett.</p> <p>The previous informal consultation with Town and Parish Councils in relation to the scale and distribution of growth in Wiltshire suggested that a large mixed-use allocation may enable infrastructure improvements, new facilities and employment areas in Royal Wootton Bassett.</p>
Object	020	Lower level of growth at Marlborough is supported.

HMA: Swindon HMA

ADS Option C: Focus on the Rest of HMA

	Rep Number	Comment
Support	020	Option should be preferred due to higher capacity for potential scales of growth in the Rest of the HMA.
Support	020	Should be preferred on the basis that higher levels of growth are feasible at Royal Wootton Bassett.
Support	020	Do not agree that the suggested dispersed impacts of SW-C would be apparent in the Rest of the HMA, given that the scales through dispersal are proportionate.
Support	020	Do not agree that strategy SW-C should be emerging as the least preferred option.
Support	021	Option C should be explored further, having regard to settlement constraints and accessibility.
Support	024	Development

Support	024	Development at Cricklade could reinforce its role in the settlement hierarchy.
Object	024	Cricklade and Lyneham lack secondary educational facilities.
Object	024	Cricklade constrained by flood risk.
Object	024	Cricklade and Lyneham would only be able to sustain limited levels of growth.
Object	020	Inconsistent with table 4 of Appendix 6 of the Cabinet report, as it proposes growth at Marlborough.
Object	041	<p>The reduced development at Royal Wootton Bassett would fail to address the need for affordable housing at this location and would not deliver any infrastructure improvements.</p> <p>Development at smaller rural settlements is likely to raise sustainability concerns in respect of landscape and heritage impacts.</p> <p>Rates of further growth west of Swindon need to be considered in the context of the Borough's need as a whole and specifically whether the Borough's needs can be met within its boundary.</p>
HMA: Swindon HMA		
General		
	Rep Number	Comment
Support	020	A combination of SW-B and SW-C should be taken forward and tested.
Support	022	Planning for the highest LHN.
Support	022	planning for the highest LHN through a range ensures flexibility to adapt to change.
Support	022	Flexibility is welcomed as it is required in ensuring that the early plan preparation is adaptable to changing circumstances and cross-boundary matters.
Support	022	Joint working between Swindon Borough Council and Wiltshire Council in developing a strategy to deliver employment land.
Support	024	Agree that the Council should be looking at a requirement figure about that provided by the Standard Method.
Support	024	Support disaggregation of LHN figure to HMA level.
Support	024	Wiltshire part of the Swindon HMA has a strong record of deliverability.
Support	024	Development at Royal Wootton Bassett would help improve infrastructure and help overcome affordability issues.
Object	024	Level of housing apportioned to the Swindon HMA is lower than what would seem to be justified.
Object	024	Dividing Swindon HMA at the administrative boundary will make it harder to address delivery issues.
Object	024	Market signals suggest an uplift in the level of future employment growth in the Swindon HMA.
Object	024	Need to justify approach strategy taken in the WCS in the face off new national policy and guidance.
Object	024	Suggest a figure beyond the 45,600 would be appropriate. Requirement figure at this stage needs to be robust in the face of a changing method.
Object	020	<p>LHN estimate of 3,255 dwellings is lower than the 4,480 estimated by the standard methodology.</p> <p>Standard method should be a baseline and therefore the housing need should not be lower than this</p>

		estimate.
Object	020	No reasoning given for a lower housing need figure in the HMA, where a 16% reduction on the Wiltshire Core Strategy is proposed.
Object	020	A LHN that reflects the standard method would require the Rest of HMA figure to be adjusted accordingly.
Object	020	On the basis that Wiltshire do not need to accommodate any of Swindon's unmet need. West of Swindon figure should be reassigned to the Rest of the HMA.
Object	020	No exceptional circumstances have been provided to justify deviating away from the standard method.
Object	020	Local housing need figure should align with jobs and workers resulting in a higher LHN, which is less sensitive to fluctuations in future years.
Object	021	The plan period should extend beyond 2036 to 2050.
Object	021	Do not believe that Swindon Borough Council are sufficiently planning for their housing requirements. Close working between Wiltshire Council and Swindon Borough Council to ensure the quantity of housing required to address a long term economic strategy is needed.
Object	023, 025	Concerns with relation to consultation process to date, lack of available evidence base, job growth not identified as a minimum and the level of proposed housing requirement.
Object	023, 025	Concerned that the Council's approach in not undertaking a Reg 19 consultation means the lack of opportunity for consultation.
Object	023, 025	Concerned by a lack of sufficient evidence to comment on and lack of sufficient evidence to underpin the Alternative Development Strategies.
Object	023, 025	LHNA – derivation of ADSs has not been outlined in enough detail.
Object	023, 025	Need to identify and publish sources used in placed based assessments. Areas where no information was available suggest that ADSs have not been identified on an objective basis. Additional evidence needed.
Object	023, 025	Sustainability appraisal testing of options is not sufficient.
Object	038	Overall it is disappointing that there is not a holistic approach being taken to the Swindon Housing Market Area between Swindon and Wiltshire. The options put forward are potentially too restrictive only identifying the requirements for Marlborough, Royal Wootton Bassett and West of Swindon. This fails to represent the opportunities for sustainable development at the Large Villages and Local Services Centres, which offer sustainable locations for growth.

HMA: Trowbridge HMA

ADS Option A: Roll forward the Wiltshire Core Strategy Distribution of homes and jobs

	Rep Number	Comment
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Support	027	Support for Westbury as a sustainable location for growth.
Support	030	Trowbridge should continue to be the primary focus of development, due to its role as a principal settlement.
Support	030	In order to accommodate the level of growth set out by TR-A in the context of constraints at Trowbridge, a capacity uplift could be applied to existing allocations.
Support	030	Opportunities to maximise development at Trowbridge are available.
Support	034	Proposes to freeze growth at Warminster essentially to existing commitments. Given its location, the fact that clear boundaries to the further development of the town have largely been reached, and that a substantial overhang of undeveloped plots are planned for, this is probably justified.
Object	026, 028	Concerns over deliverability at Trowbridge e.g. West Ashton.
Object	026	Strategy undermines growth at settlements other than Trowbridge in the HMA.
Object	026, 029	Rolling forward the housing requirement in the Trowbridge HMA should not lead to a 4% reduction to be met elsewhere in the Local Authority.
Object	028	Concerns over continued housing growth at Trowbridge.

HMA: Trowbridge HMA

ADS Option B: Westbury Growth Point

	Rep Number	Comment
Support	033	Option B Would see increased levels of growth to Large Villages and Local Service Centres. Such an approach is supported in the HMA.
Object	026	As Westbury is not a principal settlement, it should be a focus point for growth.
Object	026	Physical constraints at Westbury have not been taken into enough consideration when developing this strategy.
Object	026	Concerns over deliverability at Trowbridge.
Object	028	Continues to focus growth at Trowbridge.
Object	029	Guided heavily by the outcomes of the place based assessment.
Object	029	Baseline assessments of land for 250-300 homes suggest that the Town is capable of delivering above the level of growth proposed by TR-B.

HMA: Trowbridge HMA

ADS Option C: Focus on the rest of the HMA

	Rep Number	Comment
Support	026	New development should exploit faster rates of delivery and relevant lack of constraints in the Rest of HMA, including at large villages.
Support	031	Option C Focus on the rest of the HMA would see increased levels of growth to a Large Villages and Local Service Centres.
Object	026	Criticism of the current evidence base, as it is limited and lacking in detail.
Object	026	Constraints identified in establishing the ADS distributions are apparent in all of the proposed

		development strategies.
Object	029	Development should be more evenly spread across Westbury, Trowbridge and Warminster.
Object	034	We are sceptical that this is either appropriate or feasible. We suspect at least 1000 of these plots would need to be accommodated elsewhere.
HMA: Trowbridge HMA		
General		
	Rep Number	Comment
Support	028	Requirement figure takes account of growth need to meet employment targets over the plan period.
Support	028	Housing requirement figure is correctly outlined as a minimum as a minimum.
Support	028	Rural areas are seen to perform well and the Rest of HMA is thought to be capable of accommodating additional growth, given that many large villages form sustainable locations for growth.
Support	028	Range of site sizes and location types should be allocated.
Support	029	Need to continue to align housing numbers with job growth in ongoing testing of the strategy.
Support	038	Westbury is identified for growth with a residual requirement for between 330 and 1,025 dwellings and it is appropriate to test a higher level of growth
Object	040	We have serious concerns regarding the lack of formal consultation on the Alternative Development Strategies, the lack of clarity in the limited Sustainability Appraisal information presented and the limited opportunity to comment further on the Council's intended strategy at a point to the Pre-Submission Consultation.
Object	028	Concentration of growth at Trowbridge within the Trowbridge HMA is not supported by available evidence. Distribution of around 50% of the share for the HMA risks undermining delivery in the HMA as a whole.
Object	028	Unclear how the final disaggregation of need across the HMAs have been reached.
Object	028, 029	Need clarification of the applied methodology.
Object	028	Use of migration different trends in deriving outcomes is unclear.
Object	028	Need further justification of concentration of growth at Chippenham.
Object	028, 029	No justification for the application of migration trends in determining requirements.
Object	026	Housing requirement figure is a minimum and land for housing should be identified in excess of the higher housing requirement figure, which should be treated as the minimum.
Object	026	In the interest of affordability and supply issues, this is the most sustainable approach.
Object	026	In deriving the residual, the level of commitments for the Trowbridge HMA is made up of supply that could be delayed or fail to be realised.
Object	026	Inadequate and deficient evidence underpins all three of the strategies for the HMA. Detailed review of evidence and an update is required in determining the strategy.

Object	026	Green Belt review is needed to form part of the evidence base and determine the appropriate strategy for the Trowbridge HMA.
Object	026	Proposes alternative approach.
	026	New approach: contingency planning in determining requirement figures.
Object	026	New approach: should undertake a Green Belt review.
Object	026, 028	New approach: should allocate housing at smaller settlements and not rely on NPs or windfall sites to deliver.
Object	028	Greater clarity over numbers and specific housing numbers need to be provided.
Object	028	There is continuing scope for the standard methodology to change and a wide range of sites should be considered to accommodate uncertainty.
Object	029	Question the approach to disaggregation of the standard methodology figure to a HMA level.
Object	029	Traffic light weighting for high level assessment seems highly subjective and not quantifiable.
Object	029	Unclear how the assessment criteria have been afforded weight and whether this is equal.
Object	029	Do not agree with the place based assessment of Warminster that concludes that additional development at the town could present significant environmental risks.