



East Wiltshire HMA Housing Land Supply Statement

Update April 2013

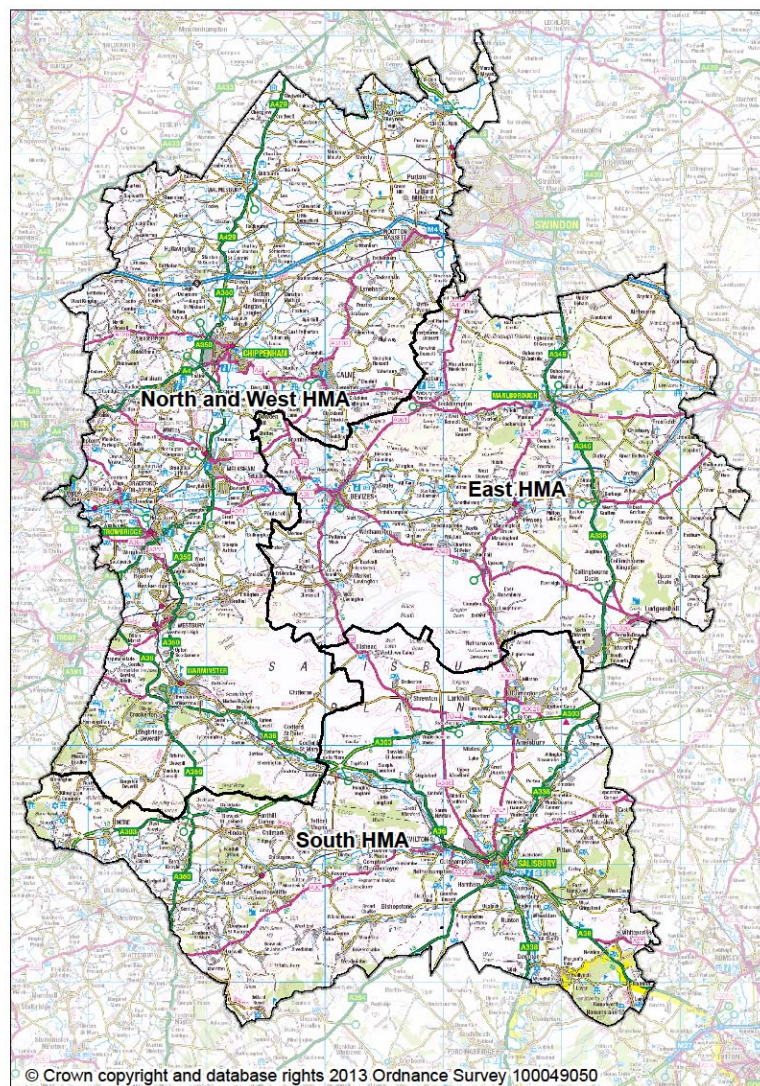
May 2013

**East Wiltshire Housing Land Supply Statement
Update
Base Date April 2013**

Policy Context – why is a land supply assessment required?

- 1.1 The Housing Land Supply Statement (published January 2013) reflects a base date of April 2012 and covers the whole of Wiltshire. This is being updated to a base date of April 2013 in a series of separate land supply statements covering each Housing Market Area (HMA). The HMAs are presented in Figure 1. This is the first update and covers the East Wiltshire HMA. It fully accords to the requirements and definitions of the National Planning Policy Framework (NPPF) as summarised below.

Figure 1: The HMAs in Wiltshire



- 1.2 The NPPF was published in March 2012, replacing Planning Policy Statement 3 (PPS3): *Housing (2006)*.
- 1.3 Within the NPPF, the Government has set out its guidance to deliver sustainable development. Paragraph 47 requires that in order “To boost

significantly the supply of housing, local planning authorities (LPAs) should:

.....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% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;....”

1.4 Furthermore, it goes on to define the deliverability of sites as follows:

“To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.”

The housing requirement

2.1 The Regional Strategy for the South West (Revocation) Order 2013 comes into force on 20 May 2013, which formally revokes the saved policies of the Wiltshire and Swindon Structure Plan 2016 and the regional spatial strategy for the South West. Following this, the only extant or emerging housing requirement for East Wiltshire is contained in the submission draft of the Wiltshire Core Strategy¹. This is the requirement against which the land supply is assessed.

Contingency

3.1 Paragraph 47 of the NPPF (see paragraph 1.3) requires an additional buffer to be demonstrated. The size of this buffer is dependent on whether or not there is a record of persistent under-delivery.

3.2 In order to assess whether or not there is a record of persistent under-delivery, Table 1 presents the level of delivery over the last five years compared to the requirement set out in the Wiltshire and Swindon Structure Plan 2016, which was the adopted development plan for all

¹ Although the adopted South Wiltshire Core Strategy contains the housing requirement for a different part of Wiltshire.

areas during this period. The entirety of East Wiltshire HMA lies within the former Kennet District. Those years in which the annualised delivery has been exceeded are highlighted in green. Table 1 also provides the average annual level of completions across the plan period to date (1996-2013). Once again, where the annualised requirement has been exceeded, these cells are highlighted in green.

- 3.3 The historic delivery is also presented compared to the housing requirement of the emerging Wiltshire Core Strategy for context.

Table 1: Housing delivery compared to annualised requirement

Requirement	Area	Annualised housing requirement	Housing Completions					Average annual completions across plan period
			2008-09	2009-10	2010-11	2011-12	2012-13	
Wiltshire and Swindon Structure Plan 1996-2016	Former Kennet District Total	262.5	400	244	441	250	181	313
Wiltshire Core Strategy 2006-2026	East Wiltshire HMA	275	400	246	437	249	181	349

- 3.4 It is evident that for this area the average annual requirement of the Structure Plan has been exceeded over the plan period to date and so there is no record of under-delivery, persistent or otherwise.

- 3.5 It is therefore the case that no record of persistent under delivery exists for East Wiltshire HMA and so a 5% contingency applies. This is equivalent to a requirement to demonstrate a 5.25 year supply that is deliverable within five years.

Components of Supply

- 4.1 The supply of deliverable land comprises:
- Sites with planning permission,
 - Sites with planning permission subject to a section 106 agreement,
 - Saved Local Plan allocations (that are proposed to be carried forward as part of the Wiltshire Core Strategy),
 - Strategic Site allocations identified within the submission draft of the Wiltshire Core Strategy, and
 - A windfall allowance (in accordance with paragraph 48 of the NPPF).
- 4.2 Each large site (of 10 or more dwellings) has been individually assessed to determine site specific delivery trajectories. For small sites, a standard development rate is applied based on historic levels of

delivery across Wiltshire for such sites. The full breakdown of sites included in the deliverable supply is available in Appendix 1.

- 4.3 The second bullet point to paragraph 47 of the NPPF requires that the deliverable supply should be updated annually and so an updated housing trajectory, consistent with this analysis, is included in Appendix 2. This is an update of the housing trajectory included within the previous Housing Land Supply Statement (January 2013).
- 4.4 A number of strategic sites are identified in the Wiltshire Core Strategy. Whilst these sites are not necessarily subject to permission or included in an adopted development plan, some of these will contribute to the land supply within Wiltshire over the next five years as part of the Core Strategy. As such, they are included in the five year land supply providing that they can be demonstrated to be suitable, available and achievable within this timescale.
- 4.5 The strategic sites form the most sustainable options for delivering strategic housing developments across Wiltshire. They have been appraised using a site identification methodology and using the Sustainability Appraisal (SA). It therefore remains, necessary only to demonstrate the availability and achievability of each site to warrant its inclusion in the land supply.
- 4.6 A windfall allowance is also included in the deliverable supply set out in Table 3 in accordance with paragraph 48 of the NPPF. A full description of the calculation of the windfall allowance is included in Appendix 3.
- 4.7 The Strategic Housing Land Availability Assessment (SHLAA) identifies a further pool of deliverable sites adjacent to settlement boundaries that could be brought forward in accordance with Development Plan policy, through the neighbourhood planning process, or a Sites Allocation Development Plan Document. However, not all such sites will be deliverable following further site specific assessments, such as landscape assessments for those sites that lie in an AONB.
- 4.8 It should be noted that this land supply statement reflects a base date of April 2013.

Housing Land Supply

- 5.1 The table below provides an overview of the five year land supply against the housing requirements contained in the submission draft of the Wiltshire Core Strategy.

Table 3: Housing Land Supply relative to the housing requirement identified in the submission draft of the Wiltshire Core Strategy

Area	Housing Requirement 2006-2026	Housing completions 2006-2013	Five year housing requirement 2013-2018	Deliverable supply 2013-2018	Number of years deliverable supply
East Wiltshire Housing Market Area	5,500	2,445	1,175	1,455	6.2

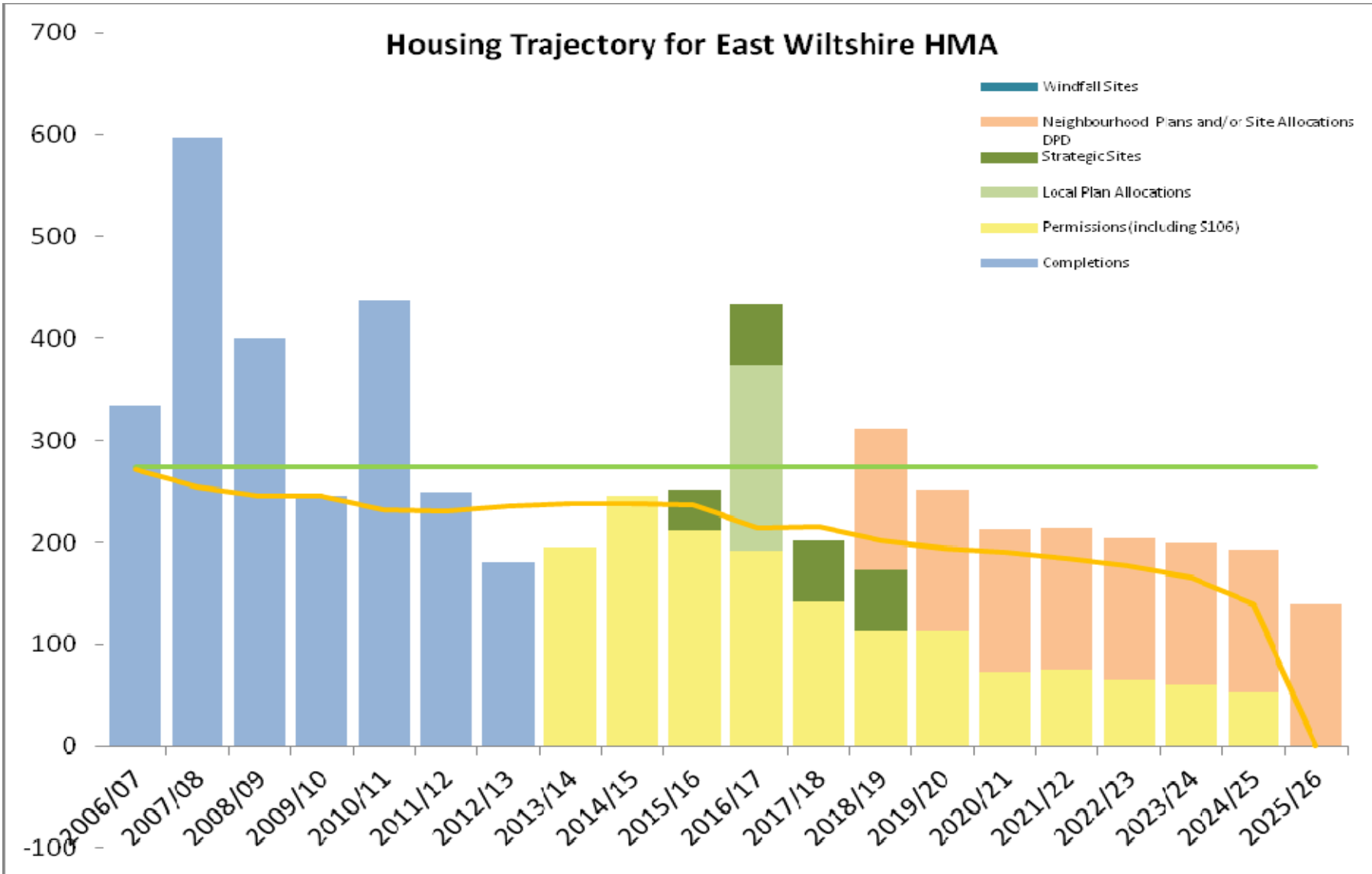
Future Monitoring

- 6.1 The housing land supply situation and the residual requirement will continue to be monitored using up to date evidence from developers and other relevant bodies, to inform and where necessary, trigger the allocation of sites to meet outstanding requirements. This is consistent with the requirements of the NPPF (paragraph 47).

Appendix 1: Components of Housing Supply

Appendix 2: Housing Trajectory

Housing Trajectory for East Wiltshire HMA



Appendix 3 - Windfall allowance for land supply calculations

A1. The NPPF (paragraph 48) identifies that an allowance for windfall may be made where appropriate. It states:

“Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.”

A2. For clarification, the NPPF defines windfall development as:

“Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.”

A3. This appendix determines an appropriate windfall allowance for the Housing Market Areas (HMAs) within Wiltshire. It analyses the trend of windfall permissions and completions over the recent past in order to determine whether there is consistent delivery from this source of supply. It then goes on to examine the potential supply from future windfall sites.

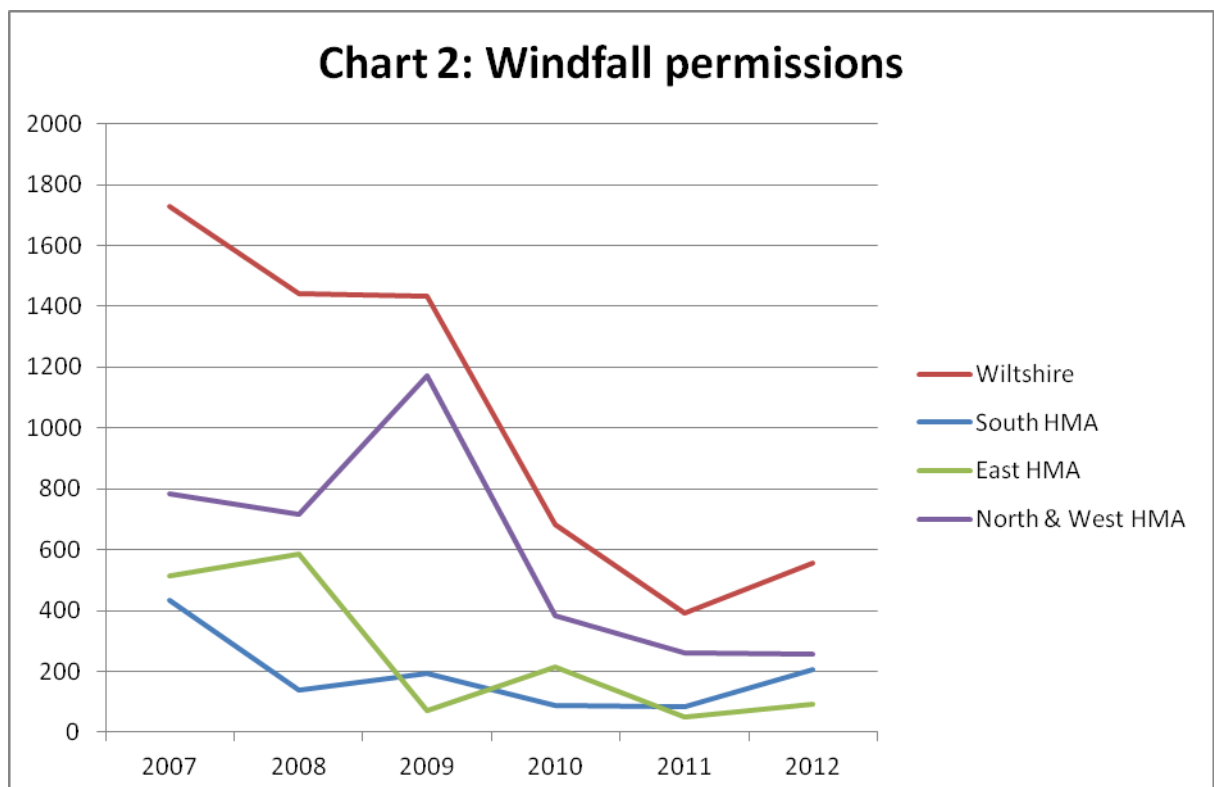
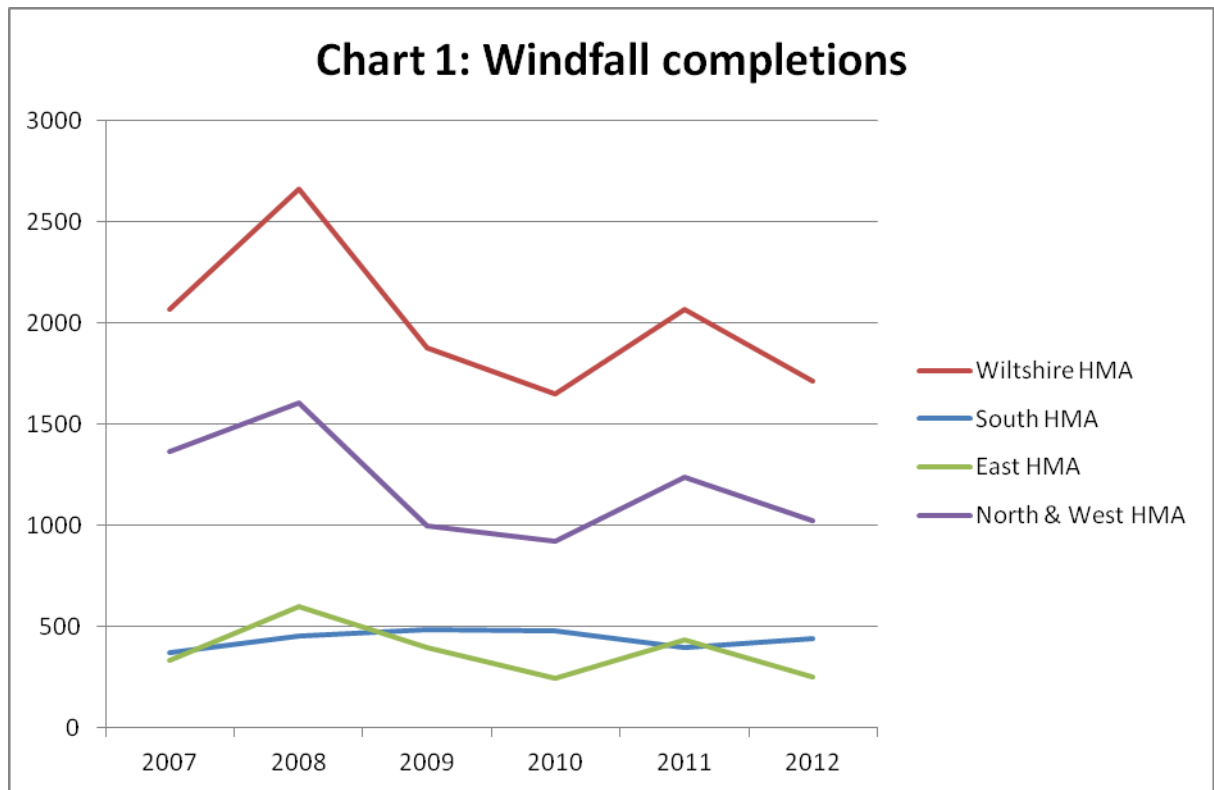
Windfall completions (2006-2012)

A4. Consistent data on housing completions is held for the period 2006 to 2012 in the Wiltshire Land Use Monitoring System. From this dataset, all previously developed sites² that were not allocated in the Local Plan process and are not on gardens have been extracted. This process has provided a list of all windfall development across this period for Wiltshire. Chart 1 presents the windfall completions trajectory for this area over the period 2006 to 2012.

Windfall permissions (2006-2012)

A5. The same exercise has been undertaken with new permitted sites. A large number of permissions in Wiltshire take the form of renewals, amendments or reserved matters on existing permissions. In order that a permission of a single site is not double-counted as a result of multiple applications, only the first application is included. However, if a subsequent permission increases the capacity, the net increase will be included from this new permission. Chart 2 presents the number of windfall permission granted for Wiltshire over the period 2006 to 2012.

² This is conservative as the NPPF also allows Greenfield sites to be included with the exception of gardens.



A6. From the above charts it is evident that the number of completions on windfall sites (Chart 1) has seen a slight decrease across the period. Given the economic climate, a decrease would be expected, but as the decrease is so slight, it would suggest that the rate of windfall delivery

would have at least remained constant (if not increased) in better market conditions. This suggests that there is likely to be continued delivery of windfall especially once the market picks up.

- A7. However, when looking at the number of new windfall sites that have achieved permission, there has been a more significant decrease. The economy will have been a contributing factor, but the extent of this is unknown. While the capacity of previously developed land maybe decreasing, there is no substantive evidence that this will limit the supply of windfall development, especially given the recent change to permitted development rights³. Indeed, the SHLAA identifies outstanding capacity on large⁴ deliverable unpermitted windfall sites (503 in Wiltshire), and so this is not considered to be the case.
- A8. In this context, with decreased numbers of windfall permissions being achieved, it is considered reasonable (and robust) to estimate the capacity of future windfall sites by considering those identified within the SHLAA together with a conservative allowance for small sites (5 or less dwellings) in accordance with the trend above.
- A9. In order to be comprehensive a number of methods for identifying a windfall allowance are set out in Table 7 and used to validate the windfall allowance used in the land supply assessment, clarifying that it should be seen as a minimum.

Method for identifying an allowance for future windfall delivery

A10. In accordance with the justification presented, the windfall allowance will comprise:

- Large deliverable windfall sites (more than 5 dwellings) identified within the SHLAA
- A conservative allowance for small windfall delivery (5 or less dwellings).

The allowance from such sites will be analysed and discussed below.

Large windfall sites for 2013-18

A11. The delivery of large windfall sites that are not currently included in the Annual Monitoring Report (AMR) land supply statement (i.e. those that are permitted or allocated), can be estimated from the capacity of such deliverable sites identified within the Wiltshire SHLAA (within settlement boundaries).

A12. Whilst the SHLAA aims to be comprehensive, a number of sites that are not identified in this assessment inevitably come forward. By way of example, since the base date of the emerging SHLAA (with a base date

³ The Government has proposed to introduce permitted development rights that enable the change of use from B1 office use to residential use where this is justified on economic grounds.

⁴ The SHLAA includes sites of more than 5 dwellings only.

of April 2012) some 109 dwellings⁵ have been permitted on large windfall sites across Wiltshire that were not identified in the SHLAA. If this was to continue across the five year period this would equate to an additional 545 permitted. The allowance for large windfall sites estimated using only SHLAA sites (of 503 dwellings) is broadly consistent with this (with an allowance for non-delivery within the five year period).

A13. On the other hand, it should not be assumed that all deliverable sites identified within the SHLAA will be delivered.

A14. In order to balance these competing delivery assumptions, it is reasonable to assume that the capacity of identified deliverable sites will be achieved. This places no reliance on these sites being delivered, as they could easily be substituted with unidentified sites.

A15. Table 1 presents the identified deliverable large windfall capacity within the SHLAA.

Table 1: Capacity of deliverable SHLAA sites

Site	Capacity
Savernake Forest Scout Group Building	15
Job Centre, Sheep Street	6
R/o 53 - 57 Church Street	6
The Beeches, Blackboard Lane	6
Manor Farm	20
East Wiltshire HMA	53
Transport Depot	26
Martigny House	19
Innox Hall	7
Vehicle Yard, Westbury North Junction	94
Land at Shurnhold	147
Hygrade Foods a Division of Tulip Ltd	6
The Elms	6
District Council Offices	54
North and West Wiltshire HMA	359
Land at Highbury and Fisherton Manor School, Salisbury	67
Land at The Avenue, Wilton (Wilton Depot)	10
Land at Riverside, Salisbury	8
Land at Grosvenor House, Salisbury	6
South Wiltshire HMA	91
Wiltshire	503

⁵ These include the following permissions N12.0185, N12.0895, N12.0638, N12.0222, S12.0983, S11.1135, W10.2407.

A16. The SHLAA excludes sites of 5 or less dwellings and so a separate allowance is made for these below.

Conservative allowance for small windfall sites

A17. As identified above, there has been a decrease in the number of windfall sites achieving permission. Despite the fact that this is likely to be a result of the economic climate and is unlikely to continue in the future, the average number of permissions across the depressed market (2009-12) will be assumed to be permitted each year for the following five. This is conservative, as it is expected that the economy will recover across this period, and even if it does not, increased market demand could increase the viability of housing delivery, thereby increasing the levels of housing development from all components of supply.

A18. The average number of new small windfall permissions across this period is presented in Table 2.

Table 2: Small windfall delivery 2009-12 and assumed delivery 2013-18

Area	Average number of new small windfall permissions per annum (2009-12)	Assumed number of new small windfall permissions (2013-18)
East Wiltshire HMA	31	157
North and West Wiltshire HMA	155	773
South Wiltshire HMA	59	295
Wiltshire	245	1,225

A19. In order to estimate how many of these assumed small windfall sites will be delivered within five years, a standard delivery rate will be applied as used in the AMR. This has been calculated using the rate of development from the date of permission from an analysis of all permissions received from 2001 to 2008. The resulting rate is presented in Table 3.

Table 3: Standard delivery rate

Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8
2.3%	22.9%	32.2%	16.6%	1.9%	2.4%	8.7%	0.3%

A20. It is evident that for a permission granted in year 1, only 75.9% will reach completion in the five year period. Indeed, only 87.3% will reach completion at all, providing an allowance for non-delivery.

A21. Applying this delivery rate to the assumed number of new small windfall sites has been done using the following matrix (Table 4). The example presented is for East Wiltshire HMA.

Table 4: Delivery matrix of newly arising small windfall sites

	Built in year 1	Built in year 2	Built in year 3	Built in year 4	Built in year 5	Sum
31 permitted in year 1	31 x 2.3% = 0.7	31 x 22.9% = 7.2	31 x 32.2% = 10.1	31 x 16.6% = 5.2	31 x 1.9% = 0.6	23.8
31 permitted in year 2		31 x 2.3% = 0.7	31 x 22.9% = 7.2	31 x 32.2% = 10.1	31 x 16.6% = 5.2	23.2
31 permitted in year 3			31 x 2.3% = 0.7	31 x 22.9% = 7.2	31 x 32.2% = 10.1	18
31 permitted in year 4				31 x 2.3% = 0.7	31 x 22.9% = 7.2	7.9
31 permitted in year 5					31 x 2.3% = 0.7	0.7
Sum	0.7	7.9	18	23.2	23.8	74

A22. The allowance for small windfall can be seen to be conservative. Indeed, of the 157 dwellings assumed to be permitted on such sites in East Wiltshire, only 74 are assumed to be deliverable. The resulting allowance for small permitted sites is presented in Table 5.

Table 5: Summary of small windfall allowance for 2013-18

Area	Small windfall allowance
East Wiltshire HMA	74
North and West Wiltshire HMA	363
South Wiltshire HMA	139
Wiltshire	575

Summary of windfall allowance

A23. By simply summing the Tables 1 and 5 above an allowance for future windfall delivery can be calculated as in Table 6.

Table 6: Summary of small and large windfall allowance for 2013-18

Area	Large allowance	Small allowance	Total allowance
East Wiltshire HMA	53	74	127
North and West Wiltshire HMA	359	363	722
South Wiltshire HMA	91	139	230
Wiltshire	503	576	1,079

A24. This allowance, as described throughout this note, has set out to be deliberately conservative. However, in order to verify how conservative this assessment is Table 7 presents the windfall allowance that would arise from using other methods and assumptions, all of which are equally robust. Each method is described briefly in footnotes 5 and 6 to this note.

Table 7: Comparison of methods for calculating windfall allowance for 2013-18

Area	Method 1 (as above)	Method 2 ⁶	Method 3 ⁷
East Wiltshire HMA	127	162	596
North and West Wiltshire HMA	722	847	1,688
South Wiltshire HMA	230	282	449
Wiltshire	1,079	1,291	2,733

⁶ **Method 2** is the same as method 1, with the exception that it assumes that the average number of new small windfall permissions from the last six years (2006-12) will be permitted for the next five, as opposed to the average for the previous three years (2009-12).

This in effect assumes that the decreased number of windfall permissions over the last three years and the higher number in the previous years represent average peaks and troughs, and so it is reasonable to assume an average. This is a wholly robust method, and providing that the economy picks up in the next couple of years will be a more accurate assessment than that presented in method 1.

⁷ **Method 3** takes no account of the identified capacity in the SHLAA. Rather it assumes that the average number of both small and large windfall permissions achieved over the last six years (2006-12) will continue to be permitted for the following five and will be delivered at the standard development rate.

This presents a reasonable allowance, on the assumption that the supply of large windfall sites will continue to be available, and that the previous six years represent an average market situation. This is a simplistic but nevertheless robust method. Delivery at this level would require the identification and delivery of a continuous supply of large windfall sites, comprising of those identified in the SHLAA, those within the scope of the Vision exercises, those identified through the developing neighbourhood plans and any other sites that arise within the proposed settlement framework or small villages.

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<http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy.htm>