

Examination of the Wiltshire Local Plan Review

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For the attention of Mr Nic Thomas – Director – Planning, Economy and Regeneration
27 February 2026

Dear Mr Thomas,

Re: Wiltshire Local Plan examination - response to Inspectors' post Stage 2 hearings letter

Thank you for your letter and enclosures dated 30 January 2026 and subsequent letter dated 26 February 2026.

We have considered your proposals and the associated work programme to address the issues and actions identified in our letter dated 22 December 2025. As you are aware, the Council would need to undertake a substantial amount of work for the examination to progress. Having reviewed your proposed project plan, we wish to raise several concerns regarding both the achievability of the proposed programme and the timeframe for the examination which would result from it.

As a starting point, under both your proposed Option A and Option B, it is currently unclear whether the Council has sufficient sites within the Strategic Housing and Economic Land Availability Assessment to identify enough suitable and available land for allocation under a revised strategy. If an additional call for sites is required, this is going to add further, significant, and currently unplanned time to the programme going forward.

Critically, the proposed work programmes for both Option A and B also make no allowance for stakeholder engagement during the examination. This is important because the scale of required changes under either of your proposed options is likely to lead to a spatial strategy and new site allocations which are significantly different from those in the submitted Plan. Engagement with stakeholders on matters such as key infrastructure will therefore be needed to inform strategic decisions regarding the strategy and sites before undertaking any public consultation. It is unclear whether those engagement requirements have been adequately factored into the work programme. There also appears to be an underestimation of the time required to achieve the necessary sequencing of the approach to Sustainability Appraisal and Habitats Regulation Assessment to appropriately assess and inform the different spatial options.

To ensure procedural fairness, the Council would also need to consult on any suggested changes to the Plan during the Examination in the same way as at Regulation 19 stage, with equivalent coverage and duration. This is necessary to ensure that no party is disadvantaged by any suggested revisions to the spatial strategy or new site allocations. It

is also necessary to identify any additional participants to the examination who may be affected by any of the changes that the Council suggest.

In light of the need for additional public consultation during the examination, and given the volume of existing representations, the additional consultation is likely to generate substantially more representations. The proposed timetables make no allowance for the preparation of a summary of additional representations received. The Council will also require adequate time to consider these before submitting any suggested changes to the Plan. This will add time that does not appear to be reflected in your proposed workstreams.

Additional participants will also undoubtedly result in a significant number of additional hearing sessions being required which would extend the overall examination timetable. The programmes for both options are also unclear on whether sufficient time has been allocated for elected members to consider any proposed revisions to the Plan and raise queries. There will also be lead-in times for any member approvals required.

Given all the above, and the fundamental nature of the changes and additional work likely to be required, the work programmes under both Options A and B appear to be unrealistic and would likely take much longer than you anticipate. In addition, once the information has been submitted, we would also need some time to review the adequacy of the work before further hearings could take place. On that basis, and taking account of the statutory notification period, we would not envisage future hearings commencing until late Spring 2027 at the earliest. That would be over 12 months from now and would be two and a half years into the examination. Even then, the hearings thereafter would be for a prolonged period as they would likely need to be staged to allow reconsideration of the revised spatial strategy before we hold any sessions on site allocations and other detailed policies.

There is also a risk, due to the protracted nature of the examination, that other elements of the Council's evidence base would become out of date before further hearings were to take place. This includes, in particular, the calculation of housing need under the standard methodology which can only be relied upon for two years. That period is likely to be exceeded before the work in your proposed programme under either option is completed.

Moreover, even if we were to find that a revised spatial strategy and/or new sites suggested by the Council would be capable of overcoming the soundness issues identified, the timetable would still need to accommodate post-hearing consultation on Main Modifications. It follows that in a best-case scenario, adoption would be unlikely before well into 2028. To put this into context, this is a Plan that was submitted in November 2024, has already been in examination for around 15 months and by 2028, would be approaching four years since submission.

Therefore, although we have sought to take a pragmatic approach, we consider that either of the proposed work programmes would result in an overly long examination. This would conflict with a key aim of the Minister of State for Housing and Planning's letters of 9 October 2025 and 30 July 2024.

In addition, the Ministry of Housing, Communities and Local Government letter to your Council on 15 January 2026 requires you to give notice of preparing a new plan by 30 June 2026, and to submit your Gateway 1 self-assessment by 31 October 2026 under the new plan-making system. We are, therefore, concerned that extending this examination

significantly will also create considerable overlap with the progression of the new plan, as it is unlikely that we could reach interim conclusions on any suggested modifications before late 2027 at the earliest. This overlap risks creating tension between the two processes, particularly if the spatial strategy and/or new site allocations in the new plan diverge from this Plan. We are also conscious that progressing the two processes simultaneously will place substantial pressure on Council resources, and the impact on your proposed work programmes as a result should not be underestimated.

To meet housing and employment needs in Wiltshire for 15 years post adoption in accordance with the National Planning Policy Framework - September 2023, the programme of work that would need to be pursued in the first instance would be your Option B. However, it follows from all of the above, that even if you were to pursue Option A, it is evident that an overly-long examination could not be avoided due to the nature of the issues identified, which relate to strategic matters of strategy and site selection.

Conclusion and next steps

To conclude, we acknowledge the work undertaken so far and the Council's willingness to complete the necessary tasks. However, fundamental changes and/or new evidence are required to overcome the significant soundness concerns that we have identified, several of which are strategic in nature. This is all work that would have to take place alongside the preparation of a new Local Plan for Wiltshire commencing this year. Furthermore, there remains a risk that, despite the significant time, effort and resources likely to be involved, it may still not result in a sound plan.

As we set out in our previous letter of 22 December 2025, the progress of the examination was subject to the Council outlining an achievable timetable for the preparation and submission of additional evidence that would not unreasonably delay the progress of the Examination. Based on the above, we do not consider that either work programme would achieve this aim. It is our view, therefore, that the most efficient and effective course of action for all parties to avoid an overly long examination is for the Council to withdraw the submitted Plan and address these matters through the preparation of the new plan under the new local plan-making system.

The alternative would be for the Council to request that we proceed to prepare and issue our report on the Plan as submitted. This would require additional time and cost to the Council. Given our fundamental concerns about the spatial strategy and the insufficient consideration of reasonable alternatives as set out in our letter dated 22 December 2025, such an approach would inevitably lead to a recommendation that the Plan is not adopted.

We therefore ask the Council to confirm which of the two options above it wishes to pursue. We recognise that this may require input from your elected members and, therefore, request that you provide us with an anticipated timescale for formally advising us of the decision within 10 working days of the date of this letter.

If there are any procedural or other questions arising from this letter, the Council should contact us via the Programme Officer in the first instance. We would be grateful if this letter

could be placed on the examination website at the earliest opportunity. We are not inviting, nor do we expect to accept, comments from other examination participants at this stage.

Kind regards,

Philip Mileham

Inspector

Gareth Wildgoose

Inspector