

**Examination of the Wiltshire Local Plan Review**

Inspectors: Philip Mileham BA (Hons) MA MRTPI  
Gareth Wildgoose BSc (Hons) MSc MRTPI

Programme Officer: Ian Kemp  
Email: [ian@localplanservices.co.uk](mailto:ian@localplanservices.co.uk)

22 December 2025

Dear Mrs Clampitt-Dix,

**Wiltshire Local Plan examination – Inspectors’ post Stage 2 hearings letter**

1. Further to the hearing sessions held on 11-13 November 2025 and our post hearings letter sent on 17 November 2025, we are now writing to you to set out our initial views on the next steps of the Wiltshire Local Plan (the Plan) Examination. In summary, having had regard to the written statements received in response to our Matters, Issues and Questions and the subsequent discussions in the hearing sessions to date, we have identified several significant issues in terms of the Plan as submitted which we go on to set out in detail in this letter.
2. We are satisfied at this stage that there is sufficient prospect that the existing legal compliance and soundness deficiencies we have identified could be overcome. This is, however, 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. The timetable should be provided to us by not later than **5pm on Friday 30 January 2026** and should include provision for monthly progress updates. To assist with the preparation of the timetable, we set out in this letter the further work which we consider to be necessary at this stage to overcome the shortcomings that we have identified so far.
3. In reaching our initial conclusions, we have considered all evidence submitted and representations made relating to the Plan to date, including the written statements and oral contributions at the hearing sessions. Our overall conclusions on soundness and legal compliance will be given in the Final Report, which will be produced taking into account all stages of the Examination. As such, any views expressed in this note are preliminary and may alter in the light of any further evidence that emerges. This includes as part of any subsequent consultation process and any necessary work on the sustainability appraisal (SA) or habitats regulations assessment (HRA). It therefore follows that the views expressed in this letter are without prejudice to the conclusions of our Final Report.

## **Initial Views and Required Actions**

### **Housing Need and the Housing Requirement**

4. As submitted, the housing requirement is 36,738 dwellings over a plan period of 2020 to 2038. This is based on a local housing need calculation (LHN) of 2,041 homes per year. However, the base date of that calculation was 1 April 2022 and more recent Office for National Statistics (ONS) workplace affordability ratios have since been published.
5. The Council has referred to the Planning Practice Guidance (PPG) which advises that the LHN calculated using the standard method may be relied upon for two years from submission of the Plan. However, it is evident that the LHN calculation informing the Plan was already more than two years old when the Plan was submitted on 28 November 2024. The PPG is clear that the LHN calculation should be kept under review and revised where appropriate.
6. It follows that we request the Council to rebase the Plan period to 1 April 2023 to match the date of the median workplace-based affordability ratios (at the time of the Plan's submission). The Council should then recalculate the LHN for the Plan period. In doing so, the housing requirement may also need to be recalculated. If the Plan period were to be extended (see later paragraphs) this would likely result in a significantly higher number of homes to be delivered. This is evident even before any detailed testing of the housing supply and would have significant implications for the examination going forward.

### **Stepped Housing Requirement / Distribution of Development**

7. Turning to the proposal to include a stepped housing requirement in the Plan as submitted, we consider that it is neither positively prepared nor justified. Whilst we note that the HRA indicates that a stepped trajectory should be considered, no clear evidence has been provided to justify at what level the step might be set at or its duration. Furthermore, the level of the step does not appear to have been subject to SA. Evidence was also provided during the hearings that the step was lower than current rates of housing delivery in the County. We are therefore concerned that it is not justified and would serve to unnecessarily delay meeting identified housing needs. In reaching this view, we note that there has not been a significant change in the level of the proposed housing requirement in the Plan when annualised and compared with the Wiltshire Core Strategy (document DP/01). Moreover, the housing trajectory provided in the submitted Plan does not seemingly correspond with a reliance upon strategic sites that would have phased delivery, nor is a majority of housing to be delivered later in the Plan period.
8. The approach pursued is instead influenced by rigidly following a distribution of development between the four Housing Market Areas (HMAs) informed by the Wiltshire Local Housing Need Assessment Update Volume One (document

SD/21). In doing so, the strategy is derived from nutrient neutrality constraints in the HRA (document SD/65) which affects the short-term deliverability of some sites in the Salisbury HMA in advance of upgrades to existing wastewater treatment works. However, in pursuing that strategy, there has been insufficient consideration of alternative distributions of development between the four HMAs which could have supported a much higher rate of housing delivery over the Plan period. This includes the alternative of allocating additional sites in HMAs other than Salisbury to provide sufficient deliverable sites in Wiltshire upon adoption and throughout the Plan period. It is necessary to assess those alternatives, given that they have the potential to be a realistic means of meeting identified housing needs in the early years of the Plan period.

9. Further work is therefore required to consider a range of alternative distributions between the four HMAs to ensure that housing needs can be met in the earlier parts of the Plan period. This should be informed by updates to the SA, which should consider a range of reasonable alternatives.

### **Proposed Salisbury Area New Community**

10. The hearing sessions confirmed our earlier concerns (see document ID1) that there is no substantive evidence to justify the proposed search area for a new community, or the related approach in Policy 21 and the Key Diagram. This is also reflected in the SA Annex 3 (document CD/03U) which provides very little detail on how Policy 21 meets SA objectives. There is also insufficient evidence to inform the HRA conclusion of no likely significant effect on European sites. The latter finding is inconsistent with the Plan, which expects around 300 homes from the new community. In that regard, we do note that there is no evidence of a reasonable prospect that any homes from this new community could realistically be delivered within the Plan period as submitted.
11. Setting aside the inconsistency between the HRA and the Plan, the intention of Policy 21 to confirm the new community only through a future review suggests it is not currently supported by sufficient evidence. The Plan also conflicts with paragraph 22 of the NPPF, which requires that where large-scale developments (such as new settlements or significant extensions to existing villages and towns) form part of the strategy for the area, that policies should be set within a vision that looks further ahead (at least 30 years) to take into account the likely timescale for delivery. In addition, the evidence provided does not adequately show the likely nature or scale of development likely to come forward, meaning the Plan cannot be modified to meet this requirement.
12. In reaching the above view, it is appreciated that the delivery of large-scale developments may need to extend beyond an individual plan period and the associated infrastructure requirements may not be capable of being identified fully at the outset. However, when taking account of the shortcomings of the SA assessment and the lack of detailed HRA

assessment, the Plan's approach is not justified nor consistent with national policy insofar as seeking to establish the principle for the strategic distribution of development beyond the Plan period and deferring the detail to a future Plan review.

13. We therefore consider that the inclusion of the proposed Salisbury area new community is not supported by sufficient evidence and is unsound. Having considered the extent of work that would likely be required to justify its inclusion in the Plan, we consider that it would not be achievable in a reasonable timescale during this Examination. Accordingly, the proposed Salisbury area new community should be removed from the Plan.

### **Broad Locations**

14. The NPPF paragraph 68 b) allows for the identification of a supply of land for homes for years 6-10 and where possible for years 11-15 years of the Plan, to include broad locations for growth. NPPF paragraph 23, however, indicates that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period. In that context, we appreciate that broad locations by their very nature often have a degree of ambiguity in terms of the precise location, scale of development, infrastructure requirements and delivery timescales. Nonetheless, the approach of the Plan to the proposed broad locations still falls considerably short of the expectations of the NPPF. The broad locations have not been identified on the Key Diagram, and need to be more specific in terms of the extent of growth that is expected to be brought forward/required during the Plan period.
15. The lack of certainty regarding the intended broad locations in Chippenham, Melksham and Trowbridge is exacerbated by the approach in Policy 3 and its supporting text which relies on further Development Plan Documents (DPDs) to assist in delivering the strategic objectives of the Plan. As such, there is insufficient evidence to demonstrate that there is a reasonable prospect that the proposed broad locations can be developed within the timescales envisaged. Therefore, we consider there are similar shortcomings to Policy 21 in terms of the demonstration of consideration of alternative approaches to the distribution of development and other locations as described above.
16. It follows that the Council are requested to reassess the inclusion of the broad locations in Chippenham, Melksham and Trowbridge. This should be undertaken as part of the additional work required relating to the distribution of development across the plan area, including revisiting the site selection process and updates to the SA and HRA. It should also include consideration and assessment of reasonable alternatives such as the identification of additional specific allocations in each of those settlements or elsewhere in Wiltshire. Following that process, if the Council was to find that one or more of the broad locations are still required, this should be fully justified in evidence including the contribution required from each along with some further details on their location and extent. The justification should also

include proposed main modifications to the Key Diagram and Policy 3 of the Plan to provide a positively prepared and effective strategy that would enable any broad location(s) to be brought forward by the end of a Plan period (without reliance solely on the preparation of a future DPD).

### **Reserve Sites**

17. We also have concerns about the justification and effectiveness of the approach taken in Policy 3 of the Plan as submitted to reserve sites. This is particularly notable given that their limited scale is likely to offer little contingency for the circumstances of housing land supply shortfall identified in the Plan. There is also concern that the trigger for the release of the reserve sites which relies upon the calculation of land supply on an HMA basis is not justified. No clear evidence has been provided why the reserve sites were not proposed to be allocated to simply provide a further land supply buffer.
18. The Council is, therefore, requested to revisit the status of the proposed reserve sites as part of the additional work required on the site selection process and updates to the SA and HRA. This should include consideration of whether they should be allocated immediately.

### **Employment Need and Delivering the Employment Requirement**

19. To reflect the changes to the housing requirement and those that may be required to the Plan period (see later paragraphs), further work will also be required to recalculate the employment land requirement. As part of that process, the Council should provide additional justification for the approach pursued in the Plan. This should include further assessment and explanation of any intended balance between homes and jobs being planned for in each of Wiltshire's Functional Economic Market Areas (FEMAs). It should also set out the extent to which supply and demand for the numbers of workers and sectoral priorities have influenced the distribution of proposed allocations in the Plan.
20. Notwithstanding the above, there are other evident shortcomings in the approach of the Plan to additional employment land in terms of soundness that will also need to be addressed. A significant concern is the approach of Policy 64 which provides support for the principle of development of unallocated sites within or adjacent to Principal Settlements, Market Towns, Local Service Centres and Large and Small Villages where appropriate to the role and function of the settlement subject to listed criteria. The flexibility afforded in the policy and the absence of prioritisation of the most sustainable locations, serves to demonstrate that there is a deficiency in setting out an overall strategy for the pattern and scale of employment sought to be delivered contrary to NPPF paragraph 20. The spatial strategy therefore lacks justification as the Plan does not bring sufficient employment land forward through allocations and broad locations noting the deliverability risks of some sites identified in the Wiltshire Employment Land Review Update (document SD/20). There is also an evident need for main

modifications to revise the policy for effectiveness to allow opportunities for existing businesses in other locations to appropriately expand.

21. We consider that further work is therefore required insofar as assessing a suitable range of alternative distributions of development between the three FEMAs in the Wiltshire Council area. This should be underpinned by revisiting the approach to site selection that informed the Plan given the potential necessity to identify an additional supply of employment land for an extended Plan period (see later paragraphs). The additional work should include updates to the SA to assess the broader range of reasonable alternatives and the HRA to both inform the proposed modifications to the Plan and to ensure that the cumulative effects are appropriately assessed and addressed.

### **Planning for Strategic Logistics Development**

22. There are further deficiencies of the Plan and Policy 64 in terms of the approach to strategic logistics development adjacent to M4 Junction 17. In that respect, we acknowledge that the evidential basis for identifying a specific quantum of logistics development in the Plan area to address regional and local needs is not currently available. Nonetheless, given the likelihood that planning applications may come forward imminently during this Plan period, it is essential that the policy approach in the Plan is clearly written and unambiguous so that it is evident how a decision maker should react to development proposals for strategic logistics development.
23. It follows that main modifications will be required to refine the criteria-based approach set out in Policy 64 for national and regional logistics development adjacent to M4 Junction 17. For effectiveness, we recommend that this would be most appropriately achieved through a new policy focussed specifically on strategic logistics development. Ideally, such a new policy in the Plan would be supplemented by identifying a new broad location on the Key Diagram or specific allocations to clearly denote the location where the new policy would apply. The identification of a new broad location or alternatively specific allocations would inevitably require additional work to identify the potential scale/boundaries. This process would need to take account of any likely constraints such as capacity of infrastructure and/or protective land-use designations. The identification of a new broad location or specific allocations should also be informed by updates to the SA, including the assessment of reasonable alternatives for bringing sufficient land forward. Updates to the HRA would also be required to assess any proposed changes that the Council provide to us, including in terms of the cumulative effects with plans and projects elsewhere.

### **The Plan Period**

24. As discussed during the hearing sessions, paragraph 22 of the NPPF - September 2023, amongst other things, requires that strategic policies should look ahead over a minimum 15-year period from adoption to anticipate and respond to long-term requirements and opportunities, such as

those arising from major improvements to infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

25. Given the extent of work required in this letter, together with the remainder of the hearings programme and consultation process that would likely follow, we consider it unlikely that the Plan would be adopted until 2027. The Plan period may, therefore, need to be extended by at least a further four years to 2042 to ensure that the Plan is consistent with national policy and effective.
26. The implications of extending the Plan period by a further four years would be that the housing and employment requirements would need to be recalculated as previously stated. Further main modifications may also be required to identify sufficient land to ensure that needs could still be met.

### **Updates to Key Evidence**

27. The Council should be mindful that any proposed changes to the Plan will need to be supported by relevant and up-to-date evidence beyond the specific additional work we have already identified in this letter. Adequate and proportionate updates to key evidence, sufficient to inform robust SA and HRA assessments and justify the proposed changes, are likely to be required. The range of evidential updates required will be dependent upon the extent of necessary changes to the distribution of development and identification of new site allocations and/or new or revised broad locations, and their relationship with their surroundings. However, as a minimum they are likely to include updated transport modelling, viability and infrastructure work. In addition, where applicable and relevant, it may be necessary to undertake further localised assessments of potential effects of any new site allocations and new or revised broad locations, such as upon air quality, historic environment, landscape and flood risk.

### **Other Matters**

28. To address our concerns expressed during the recent hearings regarding the identification of strategic policies, we also request that the Council undertake a thorough review of the policies of the Plan having regard to the strategic priorities insofar as they align with Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2024. When undertaking that process, we encourage the Council to be conscious of the differences between strategic and non-strategic policies in the context of NPPF paragraphs 11, 13, 17, 18, 19, 20, 21, 23, 28, 29, 30, 33, 36, 61, 66, 74, 119, 156 and 160.
29. Following on from the legal opinion provided by the Counsel for the Local Planning Authority regarding the ability to partially supersede policies from the existing Development Plan and the Council's further response on this

matter, we also request that the Council clearly sets out which elements of any existing policies the Council proposes to partially supersede through the Wiltshire Local Plan review.

30. The hearings to date have yet to cover the neighbourhood area designation requirements set out in the Plan. However, we are mindful of our soundness concerns regarding the Plan seeking to defer delivery of its strategy and associated strategic objectives to future DPDs. This is also likely to apply to neighbourhood area designation requirements that are included above and beyond the allocations proposed in the Plan.
31. The additional work set out in this letter provides an opportunity for the Council to prepare additional evidence and/or propose modifications to the Plan that provide greater certainty of how neighbourhood area designation requirements are to be delivered. As a minimum it should be made clear how each of the individual requirement figures have been derived and how they are intended to be met (i.e. existing commitments, windfalls or a combination of the two), and whether the Plan incorporates any specific contingencies should the neighbourhood plan process be unable to deliver the identified local needs.
32. The provision for accommodation for Gypsies, Travellers and Travelling Showpeople is not currently addressed by the Plan on the basis that a separate Gypsies and Travellers DPD is under preparation. The Gypsies and Travellers DPD is identified in the Wiltshire Local Development Scheme - March 2025 (document SD/39A) as expected to be submitted for examination in the 3<sup>rd</sup> quarter of 2025. It follows that we would be grateful for an update of the progress on the preparation of the DPD in response to this letter. The provision of accommodation for Gypsies, Travellers and Travelling Showpeople is necessary to be included in the development plan for consistency with NPPF paragraph 62. As such, we also request that the Council prepare a proposed modification to the Plan that would provide certainty that the matter will be addressed by a separate DPD.

### **Next Steps and Concluding Remarks**

33. We would like to thank the Council and participants for their co-operation during the Examination to date. Assuming that the Council would be content to progress the Examination based on the actions which we have indicated are necessary, we would be grateful of an estimate of the likely timescales associated with the individual actions. In summary the actions are:

### **Spatial Strategy**

- Consider a range of alternative distributions of housing and employment between the four HMAs to determine whether housing needs can be met in the earlier parts of the plan period. This should be informed by updates to the SA and HRA, which should consider a range of reasonable



alternatives, including whether a stepped housing requirement is needed at all.

- Revisit the site selection methodology to identify additional housing and employment land as may be required.

### **Broad Locations**

- Provide additional evidence to demonstrate that there is a reasonable prospect that the broad locations can be developed within the timescales envisaged, or if not, suggest how the soundness issues can be overcome by main modifications.

### **Potential for Plan Period Extension**

- Assess and set out the implications of extending the Plan period to meet the minimum 15-year plan period envisaged by the NPPF making the Plan period run to 2042.
- Update the housing and employment land requirements accordingly.

### **Potential Main Modifications**

Aside from the issues identified above, the following changes will also be necessary to the Plan and should be addressed by the Council in responding to our Initial Findings:

- Deletion of the Salisbury Area New Community Area of Search;
- Amendments to the approach to employment land and strategic logistics (including possible new policy and allocations);
- Clarification of the relationship with the Gypsies and Travellers DPD;
- Explanation of the approach to delivery of requirements in neighbourhood area designations;
- Clarification of the alignment of strategic policies with legislation and national policy, and;
- Amendments to provide greater specificity of the approach to the partial superseding of existing policies.

### **Evidence and Assessments**

- Updates to any key evidence considered necessary to justify the resultant changes proposed to the Plan.

34. We look forward to receiving a response from the Council **by not later than 30 January 2026**. The Council's response should include the intended programme for the next stage of the Examination consisting of the expected dates of completion for each item of work, key milestones and the dates when monthly progress updates will be provided. Ideally the entire programme of works should be completed as soon as possible to avoid unreasonable delay to the examination. Please note that whether the Examination can proceed to the remaining hearings would then be dependent on our consideration of the additional work provided and the responses to a consultation that will follow.

35. Having regard to the amount of time that has already elapsed since the Plan was submitted, we should be informed as soon as possible if the Council is unable to complete the requested additional work in a timescale that would avoid an overly long examination. In those circumstances, we would have to reconsider how best to take the Examination forward.
36. 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 envisage accepting, any comments from other examination participants at this stage.

Yours sincerely,

*Philip Mileham*

INSPECTOR

*Gareth Wildgoose*

INSPECTOR