

Examination of the Wiltshire Local Plan Review

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Dear Ms Clampitt-Dix,

Wiltshire Local Plan review – Inspectors’ Initial Questions

As you will be aware, we have been appointed by the Secretary of State to conduct the examination of the Wiltshire Local Plan Review 2020-2038 (the Plan). We have commenced our initial preparation and request some further information as well as responses to some initial questions as set out below.

Please note that further questions may be raised in subsequent correspondence following consideration of the Council’s responses to this letter and/or as a result of examining the evidence already submitted in greater detail.

Relevant National Policy and Guidance

Annex 1 of the National Planning Policy Framework (the Framework) states at paragraph 235 regarding implementation that Plans that have been submitted for examination before 12 March 2025 will be examined under the previous version of the Framework.

The submitted Plan was subject to public consultation between September and November 2023. Therefore, for the purposes of this examination, the Plan is to be examined under the September 2023 version of the Framework.

As part of our initial review of the submitted Plan, we note that the Council has, in the case of Policy 89, relied upon National Planning Practice Guidance (NPPG) of May 2024 as justification for its approach. However, we are concerned that this approach is not consistent with an examination based on the September 2023 iteration of the Framework. We therefore consider that the examination should proceed utilising the version of the NPPG as it stood in September 2023 to align with the Framework we are examining the Plan against.

As such, please can the Council advise at this early stage whether there are any other policies reliant on later amendments to the NPPG? If so, please can the Council consider whether potential Main Modifications (MMs) are necessary to address this. This is in order to make the most productive use of time and resources over the course of the examination.

Proposed changes to the submitted Plan

The starting point of the examination is the Regulation 19 version of the Plan which was subject to consultation in accordance with the 2012 Regulations, and that the Council submitted a Plan that they consider to be sound and legally compliant. However, in that latter regard, we note that the Council has provided

a schedule of proposed changes (SD/41A) for our consideration during the examination.

Based on the evidence before us, those proposed changes in SD/41A have not been subject of public consultation prior to submission of the Plan. Furthermore, some of the proposed changes individually, or taken together, would materially affect the policies of the Plan should they be implemented. Consequently, for the purposes of the Planning and Compulsory Purchase Act 2004, the proposed changes would only constitute MMs to the Plan if we consider that they would be necessary for soundness and legally compliant. We will therefore consider these issues as part of the examination.

Duty to Cooperate

The Council has provided a number of Statements of Common Ground (SoCG) with prescribed bodies along with some updates on 20 February 2025. As you will be aware, the Duty to Cooperate (DtC) applies up to the point of submission of the Plan. We note that the recent updates to some of the SoCG include reference to meetings held post-submission of the Plan.

Please can the Council clearly differentiate through the submission of updated SoCG the discussions that have taken place up to submission under the DtC from any other meetings that are part of general discussions with these bodies?

In addition to the above, the Examination Library provided on submission of the Plan and the additional documents recently submitted do not seemingly include SoCG with a number of neighbouring authorities (for example, Gloucestershire County Council, Oxfordshire County Council, South Gloucestershire Council, Vale of the White Horse District Council and West Berkshire Council), and other prescribed bodies such as Homes England, NHS England, Network Rail and Swindon and Wiltshire Local Enterprise Partnership. Please can you confirm whether signed SoCGs under the DtC are to be submitted for each of these prescribed bodies?

If the Council does not intend to provide an up-to-date and signed SoCG for any of the prescribed DtC bodies, we would be grateful for an explanation of the intended approach.

Plan period

The revised spatial strategy topic paper (SD/16) shows the Plan period of 2020-2038 commencing in advance of the date of the most up-to-date calculation of Local Housing Need. In that regard, the plan period would look forward around 13 years from the current date which the Council seeks to justify as being 15 years from the date of the assessments of housing and employment needs. However, paragraph 22 of the Framework (September 2023) expects strategic policies to look ahead over a minimum of 15 years following *adoption* of the Plan. As a result, the submitted Plan would not appear to look sufficiently far ahead to anticipate and respond to long-term requirements and opportunities.

We identify this matter to you at this early stage as it is clearly a matter of concern and one which will have implications for the rest of the examination,

including our consideration of whether the Plan is positively prepared and consistent with national policy with respect to the overall amount of housing and employment land to be identified.

Proposed Salisbury Area new community

Policy 21 of the Plan identifies an area of search for a new community north of Salisbury within the plan period. However, we have significant concerns that there appears to be no substantive evidence provided to support its inclusion in the Plan. Policy 21 itself references the need for the new community being confirmed through a review of the Plan which suggests that it cannot currently be justified. Furthermore, we cannot find any criteria to support the delineation of the area of search as shown on the key diagram.

Paragraph 22 of the Framework states that:

'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.'

We also note that despite the references to the need for the new community not yet being established, the Plan relies on the delivery of around 300 homes from this source later in the plan period.

Housing supply

From our early review of the representations, we note that several sites included within the Plan (and thereby the housing trajectory) have, following the Regulation 19 consultation, been identified as unavailable and that your suggested MMs propose deleting them from the Plan. As such, we will need to consider the implications of those potential changes to the Plan as part of the examination, including in terms of the effect upon housing land supply.

Housing Delivery Topic Paper (SD/59) indicates the anticipated number of years of housing supply forecast from 2024-2028 inclusive in Figure 5. However, we are unable to find the corresponding detailed evidence of the sites and their phasing profile which reflects this or the housing trajectory in Figure 4.1. Please could you provide us with the supporting site-specific evidence which underpins the housing trajectory but recast this with the four unavailable sites excluded.

The tables included in the Plan showing the distribution of housing growth in the Housing Market Areas and rural areas (tables 4.2, 4.4, 4.6, 4.8, 4.10, 4.12, 4.14 and 4.16), show completions and commitments to 31 March 2021, and the residual residential requirement to 01 April 2022. This is significantly in advance of the submission of the plan, but also, in advance of the calculation of Local Housing Need. However, we note that the footnote accompanying these tables suggests that major permissions to 2023 are also included in the second column, but also that document SD/59 updates these figures to 2023, but shows major permissions up to 31 August 2024.

For the examination to be effective we require the calculation of housing figures to be as up-to-date as possible and have a consistent base date. As such we would be grateful if the Council could please prepare and submit to us a set of updated tables including completions and extant permissions and an updated 'residual' with the most recent financial year as its base-date. We ask for the Council's views on whether this should be produced to take into account the forthcoming 2024/25 financial year, and how long this may take to prepare?

Housing needed for different groups

Paragraph 62 of the Framework indicates that in the context of establishing the amount of housing to be planned for, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. The examples of those groups include travellers housing needs to be assessed in accordance with the definition in Annex 1 of Planning Policy for Traveller Sites. In that respect, we note that the Plan does not specifically address the matter of travellers housing needs as it is otherwise intended to be dealt with under a separate Gypsies and Travellers Development Plan Document (DPD) identified in the Local Development Scheme (SD/39) as anticipated to be adopted by Quarter 3 of 2025. In light of that situation, we would welcome an update on the current status of the Gypsies and Travellers DPD, together with the Council's view as to whether there should be provisions in the Plan to ensure certainty of how those needs would otherwise be met in the event that the Gypsies and Travellers DPD were not to reach adoption.

Existing Development Plan policies to be superseded/ not-superseded by the Local Plan review

The Plan includes, at Appendix A, tables A.1 to A.8 which set out the policies in the existing Development Plan for Wiltshire which are proposed to be deleted upon the adoption of the Local Plan review. However, it appears that this does not include a number of policies which relate to the 'existing plan allocations' upon which the Council relies on as part of its submitted Development Strategy. The relevant policies in these cases appear to only be listed in the accompanying 'Planning for...' evidence documents (SD/01 to SD/15) rather than within the Plan itself. We would therefore be grateful if you could provide us with a consolidated list of policies which would be retained, including all those which relate to 'existing plan allocations' to which the Plan's housing strategy and trajectory relies.

Please can the Council also advise us why you are seeking to retain parts of previous older Plans with allocations rather than having them within the submitted Plan?

Highway matters

We note that concerns have been raised by National Highways regarding the effect of certain policies (e.g. Policy 47 – Royal Wootton Bassett Market Town) on the Strategic Road Network. The Council has identified that further modelling work is being undertaken. Please could you advise what has been commissioned

and provide us with an indication of when this information may be completed and available for our consideration?

Retail evidence

The submitted Plan's approach to retail and town centres is supported by the Retail Study (2020) (SD/23 and 23A). However, we have some concerns that this evidence may not be sufficiently up-to-date as the projections within it would not have been able to take into account the effects of the coronavirus pandemic on shopping patterns. Is the Council intending to update this during the examination?

Examination documents

The procedural aspects of the examination will follow the Planning Inspectorate's Procedure Guide for Local Plan Examinations¹ - a copy of which should be included on the Examination website. In addition, as part of our initial preparation we have noticed that there are a significant number of documents that are mentioned in the Plan that are not currently included in the Examination Library. We would, therefore, be grateful if the Council could undertake a thorough review of the Plan and rectify the omissions from the Examination Library of any documents mentioned, by adding those documents as soon as possible. This should include a section where background documents are made available, which for certainty should include the existing documents that comprise the Development Plan (including any Neighbourhood Plans that have been made).

Next Steps

This letter raises a number of concerns and includes several questions and requests, some of which will require the Council to undertake further work. We appreciate that this may take some time to address fully and robustly. However, to ensure that progress on the examination keeps moving efficiently, we request that the Council respond by no later than three weeks from the date of this letter. This should explain your position with respect to our initial questions and requests. We assume that given the extent of work requested it will not be possible to complete all of the work raised in this letter by that date, so we ask that you set out a reasonable timetable for providing the information and clarifications that we seek.

In terms of how the examination can progress from here, much depends on the Council response to this letter. You will appreciate that we have raised a number of significant concerns. Therefore, until we have the Council's reply, we will not be in a position to set out a definitive process or timetable for the next steps of the examination.

If anything in the preceding paragraphs is unclear, please do not hesitate to contact us via the Programme Officer. Once the requested information has been

¹ [Procedure Guide for Local Plan Examinations - GOV.UK](#)

received, we will give it due consideration before advising on the next steps to be taken as soon as possible.

Your sincerely,

Philip Mileham and Gareth Wildgoose

INSPECTORS