

# DRAFT

Tisbury Parish Council

Response to Wiltshire Council local plan March 2021

This document represents a summary of Tisbury Parish Council's response to the consultation on Wiltshire's emerging local plan . We have also responded to the online questions . Because of our location our response is limited to the document "Empowering local communities " and the briefing meetings on 1<sup>st</sup> and 2<sup>nd</sup> February 2021.

## 1 Timing

Along with other bodies we have we have requested an extension to the consultation process. Many of the interested parties are unpaid volunteers giving of their own time. Allowing only 5 weeks between briefing and submission deadline is simply inadequate. Many parish councils for instance may only meet once per month We therefor respectfully suggest that this consultation has at best been poorly planned and at worst is biased against the volunteer community.

## 2. Accessibility

We are struggling to discover where facility has been provided for those without internet access to respond to this consultation.

## 3 Lack of maps

We have found it difficult to pinpoint defined areas mentioned without the inclusion of maps in the documents and no online links to maps. In our particular case we have a housing target allocated to Tisbury the local service centre. We have no indication of the geographic boundaries of this area

## 4 Location definitions and indicative housing requirement calculation

The Housing requirement calculation uses the Local service centre as the relevant entity. In the threshold for Affordable housing calculation the entity is clearly stated as the Parish. We know the boundaries of the Parish . We do not know the physical boundaries of the local service centre.

We are very grateful to Louise Tilsed for her quite brilliant explanation in writing to us of the housing requirement algorithm. For completion we have included it in this response as Appendix 1. Louise is clearly very expert in this field. The rest of us are not and a much simpler explanation should have been provided in the documentation. Even Louise does not explain the derivation of the baseline for Large Service Centres of 100 homes ie 5 per year over the period of the plan.

Our understanding of Louise's explanation for Tisbury Service Centre is that our allocated requirement over the period of the plan is 135 dwellings. With 70 already produced or committed since 2016 the outstanding balance is 65 . We find this acceptable but once again we would like to know the geographic area it refers to as "Tisbury Service Centre" and if it is different to the Parish boundaries.

### 7 Affordable Housing requirement and threshold.

We support the 40% level of affordable housing provision . We support the creation of rural entities where the threshold for affordable housing provision is a development 5 dwellings. We expect Tisbury to be one of these entities.

### 8 Permitted development

We are puzzled by the thinking behind this suggestion and require further explanation.

### 9 New policy 44

We have few objections to this redrafted policy and would make the following comments:

Condition (i) needs to be stronger

We see no reason for condition (v) to be increased to 20 dwellings this needs to be explained.

We strongly support the commitment to community led housing and the involvement of Community Land trusts

For community led housing the Council must be flexible within the law in its allocations policy to ensure it is the local community that benefits. We would like to see some reflection of this within the policy.

### 9 Environmental issues

TBA

### 8 neighbourhood planning and 5 year housing supply.

The consultation documents refer continually to neighbourhood plans and their importance. Neighbourhood planning will cease in Wiltshire if the council is unable to properly manage the 5 year housing land supply. These construction of these plans require enormous giving of time by volunteers and they will not do it if a plan can be cancelled after 2 years. It would be appropriate to see some recognition of the Council's responsibility in this regard in the local plan.

## Appendix 1

### Response to Tisbury Parish Council by:

Louise Tilsed Senior Planning Officer Spatial Planning Team Wiltshire Council

### **Indicative housing requirement calculation**

Essentially, we have designed a model to help us disaggregate the housing requirements to each of the Large Villages and Local Service Centres, with the objective of being as equitable as possible. The model takes into account the position of each settlement in the settlement hierarchy, the relative size of each settlement (both geographically and in terms of number of homes) and how each of them is affected by various constraints.

Under the current policy framework the average Small Village delivers approximately 10 homes over a 20 year period through small scale infill development. It is reasonable to expect Large Villages to provide more homes than a Small Village and that Local Service Centres should provide for more than Large Villages. Therefore, the starting point for the calculations is that all Large Villages should, in theory, provide for at least new 1 home per annum and Local Service Centres should provide at least 5 homes per annum. The remaining housing requirement for the relevant tier of settlements is then disaggregated and applied *on top of* these minimum requirements.

As you will have seen from the table on page 15 of the Empowering Rural Communities Topic Paper, in the Salisbury HMA 1,070 homes have been allocated to be met within the Local Service Centres (LSCs). This figure is derived from historic rates of housing delivery at the LSCs. Each of the four LSCs start off with a requirement of 100 homes (5 dwellings per annum) for the plan period. This leaves 670 homes to be distributed to the settlements, in addition to the initial 100 homes starting point, according to their relative size and how constrained they are.

The constraints are applied sequentially, cookie cutting each one from the settlement area as we go. This avoids double counting from overlapping constraints. We also include, in the calculations, a 100m area outside of the settlement boundaries to ensure that we capture the relationship with constraints that are in the immediate vicinity of the settlements.

Each constraint is given a baseline (per annum) housing requirement which represents a theoretical expectation for the average sized Large Village or Local Service Centre, if it was completely covered by that constraint and only that constraint.

These baseline requirements are therefore adjusted for each settlement, based on the proportion of a settlement affected by a constraint and its size relative to the size of the average settlement.

So, if an average sized Local Service Centre was wholly within an Area of Outstanding Natural Beauty, with none of the other constraints applying, the 3 home per annum baseline housing requirement for AONBs would be applied, unadjusted.

If we take Tisbury as an example (in the Salisbury HMA), the village area is partially overlain by Flood Zones, which have a housing requirement of 0, (because we shouldn't be building homes in the flood zones), and two of the constraints listed that have baseline housing requirements above 0, those being the Conservation Area (1 homes per annum) and the AONB (3 home per annum).

Working through the stages of the calculation:

- We start with a baseline requirement of **5 homes per annum (or 100 homes over the plan period)** because this is the minimum expectation for all Local Service Centres.
- Approximately 15.5% of the settlement area is affected by Flood Zones. **This part of the settlement area is cut out and given a base line requirement of 0.**
- The model then goes through each of the constraints in the sequence until it finds the next one that overlaps with the remaining settlement area.
- In the case of Tisbury, the next constraint to apply is the Conservation Area. Conservation Areas have been given a base line requirement of 1 home per annum (remember that this is for a theoretical average village covered in its entirety by that constraint). Tisbury is the smallest of the LSCs in the Salisbury HMA and the Conservation Area only covers approximately 17% of the settlement area. The resulting baseline figure for the proportion of the settlement within the Conservation Area is adjusted accordingly, in this case to 0.1 homes per annum or **2 homes over the 20 year period.**
- The next constraint to apply is the AONB, which covers the entire remainder of the settlement area for Tisbury. The **AONB has been given a baseline requirement of 3 homes per annum**, which is then also adjusted according to the relative size of the village and the proportion of the settlement area left after removing Flood Zones and the Conservation Area. **This results in a requirement of 1.6 homes per annum, or 32 homes over the 20 year plan period** for the remaining settlement area in the AONB.
- **No other constraints apply, so the requirements for each of the constraints is added to the initial 100 homes baseline (100+0+2+32), and rounded to the nearest 5, which gives a housing requirement for Tisbury of 135 homes over the plan period.**