

NEW FOREST DISTRICT COUNCIL'S RESPONSE TO THE CONSULTATION ON THE PRE-SUBMISSION DRAFT WILTSHIRE HOUSING SITE ALLOCATIONS PLAN

1. PURPOSE OF REPORT

- 1.1 To agree the Council's response to the Consultation on the Pre-submission draft Wiltshire Housing Site Allocations Plan, closing on 22 September 2017.

2. BACKGROUND

- 2.1 A draft Wiltshire Site Allocations Plan has been prepared to identify, where necessary, new allocations for housing at settlements to provide for additional housing to ensure the delivery of the Wiltshire Core Strategy housing requirement of at least 42,000 dwellings (2006 to 2026) and maintain a five year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026. The Draft Plan will complement the Chippenham Site Allocations Plan and neighbourhood planning. The overall level of growth proposed for allocation in the Draft Plan is 2,465 homes; with 1,205 homes in the North and West Wiltshire Housing Market Area (14 sites), 350 homes in the East Wiltshire Housing Market Area (4 sites) and 910 homes in the South Wiltshire Housing Market Area (6 sites). These are additional to allocations made on the Core Strategy.

3. PROPOSED RESPONSE

- 3.1 The proposed response focusses on four main areas
- the need for the next review of the Wiltshire Core Strategy to fully consider possible housing needs for the Salisbury Housing Market Area arising from beyond Wiltshire's administrative boundaries
 - reiterating the importance for any relevant forthcoming Neighbourhood Plans and the next review Wiltshire Core Strategy to have appropriate mitigation measures in place for development related impacts on the New Forest SPA and SAC
 - probable in-combination effects on the Hampshire Avon SAC/SPA/RAMSAR (water quality) arising as a result of the proposed housing site allocations within the South Wiltshire Housing Market Area and Warminster
 - general comments on the housing site selection methodology used for the Housing Site Allocations Plan
- 3.2 The full proposed response is contained within Appendix 1

4. ENVIRONMENTAL IMPLICATIONS

- 4.1 There are potential environmental implications for the Hampshire Avon SAC/SPA/RAMSAR that may arise as a result of the proposed housing site allocations within the South Wiltshire Housing Market Area and Warminster. New Forest District Council suggests that this is a matter that requires joint (and wider) consideration under the Duty to Cooperate and would welcome an early discussion about next steps.

5. CRIME AND DISORDER IMPLICATIONS / EQUALITIES AND DIVERSITY IMPLICATIONS

5.1 None

6. RECOMMENDATION

6.1 To agree the consultation response as attached at appendix 1.

7. DECLARATION OF INTEREST

7.1 The Portfolio Holder declared an interest as a Chartered Planning and Development Surveyor who undertook planning consultancy work within the Wiltshire Council area. He did not consider however that there was a direct relationship that would prevent him from taking the decision.

8. PORTFOLIO HOLDER ENDORSEMENT

I have agreed to the recommendation of this report.

Sign: *EJ HERON*

Date: 12 September 2017

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Background papers:

Published documents¹

Date notification of this Decision given – 12 September 2017

Last date for call-in – 19 September 2017

¹ Pre-submission draft Wiltshire Housing Site Allocations Plan (July 2017)
<http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/planningpolicydocuments.htm?directory=Wiltshire%20Housing%20Site%20Allocations%20DPD/Pre-Submission%20Consultation%20July%202017>

Appendix 1: New Forest District Council Response to the Consultation on the Pre-submission draft Wiltshire Housing Site Allocations Plan

Objectively Assessed Housing Need and Housing Site Selection Approach

The draft Wiltshire Housing Site Allocations Plan (WHSAP) is based on the housing requirement from the existing adopted Wiltshire Core Strategy. The Duty to Cooperate statement appendix 2 makes reference to implications of housing requirements of the wider South Wiltshire Housing Market Area that are within the New Forest. We welcome this being recognised as a strategic issue for the Duty to Cooperate.

The site selection methodology for the Pre-submission draft Housing Sites Allocation Plan seeks solely to deliver a relatively modest number of additional dwellings to ensure that the Wiltshire Core Strategy housing requirements are met. On this basis it excludes detailed consideration of the housing potential of several of the Large Villages in the South Wiltshire HMA, and does not appear to consider potential needs arising outside of Wiltshire.

Officers from NFDC and the new Forest National Park Authority have recently met with Wiltshire representatives to explain that there is likely to be housing need in our plan areas (parts of which are in the Salisbury HMA) that we will not be able to accommodate.

Both authorities aim to publish draft local plans for submission early in 2018 and we would ask that in finalising the WHSAP, Wiltshire Council take into account any unmet housing need from our areas.

It is also important that future assessment of housing needs in the next review of the Wiltshire Core Strategy includes consideration of the parts of the New Forest located within the Salisbury HMA.

Recreational impacts on the New Forest European Sites

The Habitat Regulations Assessment that forms part of the evidence base for the WHSAP concludes no likely significant effects on the New Forest SPA due to no proposed sites being within the visitor catchment area (HRA uses an 8km radius to establish the visitor catchment area).

The draft Housing Site Allocations Plan does not propose to allocate any sites that are proximate to the New Forest SPA/SAC. However, given that there are parts of Wiltshire (e.g. Downton) that are closer to the New Forest SPA/SAC than some locations in New Forest District, and new homes are being constructed in this area, we reiterate the importance for any forthcoming relevant Neighbourhood Plans and the next review of the Wiltshire Core Strategy to have an appropriate mitigation approach for recreational impacts in place for the New Forest SPA/SAC. As the draft WHSAP notes at paragraph 2.21:

“There are at the moment over sixty Neighbourhood Plans either being prepared or completed in Wiltshire and many more plans are likely over the years ahead. Many of these involve identifying land to meet the need for new homes. Their role in meeting housing requirements will become more significant alongside the Plan”

Air quality impacts on the New Forest European Sites

The Wiltshire Core Strategy HRA did not identify an adverse effect on the integrity of any European sites (including the New Forest SAC) from nitrogen deposition, subject to the implementation of an air quality strategy for Wiltshire. This conclusion remains the same

on the basis that little has changed and no additional growth is being proposed in those parts of the county closest to those designations.

However, following a [High Court judgement](#) earlier this year the approach to assessing in-combination air quality impacts in the Wiltshire HRA may need to be reconsidered. Appropriate Assessment work for the emerging New Forest Local Plan has for example been unable to screen out potentially significant in-combination effects from nitrogen deposition in a number of main road corridors through the New Forest, including the A36 Salisbury to Southampton. Second stage screening is in progress.

In-combination water quality impacts on the Hampshire Avon SAC/SPA/RAMSAR

The draft WHSAP proposes site allocations of 910 homes in the South Wiltshire HMA and around 200 in Warminster, all of which will be served by waste water treatment works that discharge to the River Avon or its tributaries. We understand that the Warminster WWTW was unable to achieve the required phosphorus reductions after an EA review of consents in 2010, and that this was part of the reason for production of the River Avon Nutrient Management Plan (2015). We also understand that there are some concerns about whether the NMP has achieved its phosphorus reduction objectives and also that the housing growth assumptions that it is based on are already being exceeded.

Appropriate Assessment work in progress for the NFDC Local Plan review has not been able to rule out likely significant effects on water quality, including in-combination effects. The authors recommend further work with the relevant bodies including Wiltshire Council, to gather more detailed evidence to inform the appropriate assessment.

It therefore seems likely to us that allocation of additional housing sites in South Wiltshire and Warminster (and any Neighbourhood Plan housing additions on the Avon system e.g. at Downton) may trigger the same in-combination effects issues for Wiltshire Council, affecting high risk parts of the Avon system as identified in the NMP.

We suggest that this is a matter that requires joint (and wider) consideration under the Duty to Cooperate to identify appropriate solutions for the Avon catchment as a whole. We would welcome an early discussion about next steps.