

MINUTE BOOK

Enquiries to: Marie Todd

19 September 2008

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Dear Councillor,


Chippenham Area (3) Committee – 22 September 2008

I attach the following reports which the Chairman has agreed to consider as urgent items at the meeting to be held on 22 September 2008:

- Regional Spatial Strategy (Report prepared for the Spatial Planning Advisory Group meeting)
- Bath Road Redevelopment (Confidential item – circulated to North Wiltshire District Council Members only)

If you have any queries, please do not hesitate to contact me on 01249 706612 or via the e-mail address indicated at the top of this letter.

Yours sincerely



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Seventh Meeting – 1st October 2008

- 1: **Introduction**
 - 1.1 **Purpose:** To introduce the Spatial Planning Advisory Group and in particular to welcome the external invitees.
 - 1.2 This is the seventh informal paper to be presented to the North Wiltshire District Council Spatial Planning Advisory Group. The Group was set up in June 2006 by the Executive as a replacement to the previous arrangements for assisting the Council in the delivery of local planning policy and related matters.
 - 1.3 **Action:** For information only. No action is required.
2. **Decisions taken under Delegated Authority**
 - 2.1 **Purpose:** No Delegated Decisions were made under the terms of the protocols for the Authorised Officer.
 - 2.2 **Action:** For information only. No action is required.
3. **Notes on the Current Progress on the Local Development Framework**
 - 3.1 **Purpose:** This section provides an update on the progress that has been made in preparing Local Development Documents and related research. It is for information only, though Members may wish to ask questions if there is any further detail required.
 - 3.2 Each project listed below relates to a specific area of work currently undertaken by the Spatial Planning Team or associated Teams.

The Wiltshire Local Development Scheme

- 3.3 The Implementation Executive, a legal body associated with the move towards One Council for Wiltshire, will receive a proposal for a new Wiltshire Local Development Scheme. Such a scheme must be provided to the Secretary of State by 31st of December 2008 under the terms of new Regulations that are shortly to be published. The Implementation Executive will be the body that approves its content prior to submission.
- 3.4 A copy of the informal report on this subject that briefed the Implementation Executive is attached for information.
- 3.5 **Action:** For information only. No action is required.

The Core Strategy Development Plan Document.

- 3.6 As reported at the last meeting of SPAG, work on the Core Strategy for North Wiltshire has been suspended pending the consideration of a Wiltshire-wide Local Development Framework.
- 3.7 All of the forward planning teams within the Districts and the County Council have been meeting regularly as a single project team to prepare for the new Core Strategy for Wiltshire. It has been agreed that it is appropriate for the Salisbury Core Strategy to be completed given its advanced stage of preparation. However, efforts will generally be directed into producing a new Wiltshire Core Strategy using the evidence already gathered from the Districts' own Core Strategy work, supplemented as necessary with new evidence as required.
- 3.8 The Implementation Board has recently created a Wiltshire Local Development Framework Board to oversee this and other work associated with the Wiltshire LDF. It is to that body that future work on the LDF will be presented.
- 3.9 It should be noted that under the terms of the forthcoming Regulations, responsibility for the LDF will transfer from the Districts to the County Council as Preparing Authority.
- 3.10 **Action:** For information only. No action is required.

The Statement of Community Involvement

- 3.11 No recent work has been undertaken. Work will be undertaken next year to produce a new Wiltshire-wide SCI.

The Affordable Housing Supplementary Planning Document

- 3.12 A report was recently presented to the Overview and Scrutiny Committee of NWDC on the progress of the affordable housing SPD, as amended earlier this year. It noted that small schemes were coming forward which indicated that the amendments have been having the desired effect of encouraging the provision of affordable housing contributions.

- 3.13 **Action:** For information only. No action is required.

The Open Spaces Supplementary Planning Document

- 3.14 Work on this SPD has been suspended, pending the production of a new Wiltshire LDS.

The Sustainable Development Supplementary Planning Document

- 3.15 Work on this SPD has been suspended, pending the production of a new Wiltshire LDS.

The Design Guide Supplementary Planning Document

- 3.16 Work on this SPD has been suspended, pending the production of a new Wiltshire LDS.

The Regional Spatial Strategy.

- 3.17 The Modifications to the Regional Spatial Strategy were published in July and is out for public consultation. The consultation period ends on 24th October 2008.
- 3.18 Appendix A sets out an assessment of the major points of interest in that Modifications Document to NWDC. It should be read in conjunction with the Modifications to the RSS document should members of SPAG wish to see the source material.
- 3.19 Copies are available either from this office or directly from the South West Regional Assembly website:
http://www.southwest-ra.gov.uk/nqcontent.cfm?a_id=4145
- 3.20 In general, officers have concluded that, with one exception, there are no significant reasons to object to the Modifications to the RSS.
- 3.21 The exception is in relation to the method by which a proposed number of pitched for Gypsies and Travellers has been arrived at. Appendix B set out the reasons why it is considered that the assessment of the RSS in that respect is inadequate.
- 3.22 Appendix C is a draft letter to the South West Regional Assembly that the Head of Policy and Performance intends to submit under delegated authority.
- 3.23 **Action:** The Spatial Planning Advisory Group is asked to endorse the proposed letter as a formal response to the consultation on the Modifications to the South West Regional Spatial Strategy.

West of Swindon: Potential Development of 3000 dwellings

- 3.24 The Joint West of Swindon Study, previously reported to SPAG, was incorporated into Swindon Borough Council's own work; "The Small Scale Urban Extensions Study" on the Swindon Borough Local Development

Framework. This study only looked at the possibility of considering the need for a site or sites up to 1000 dwellings as set out in the Wiltshire and Swindon Structure Plan.

- 3.25 However, now that the RSS is proposing 3000 dwellings in the North Wiltshire area on the urban edge of Swindon, this work has had to be updated. Staff from NWDC have been working closely with Swindon Borough Council on this updated Study.
- 3.26 The work is due to be completed for consideration by NWDC's Executive in early November. A short presentation will be made to SPAG outlining the work that has been done and its implications.
- 3.27 As an aside, this work is being done in the knowledge that there is a current planning appeal at Moredon Bridge which has implications for development to the west of Swindon generally. It is possible that pre-emptive planning applications may be made that will inevitably speed up the process of decision making in that area.
- 3.28 **Action:** SPAG Members are invited to comment on the presented material.

The Strategic Housing Land Availability Assessment

- 3.29 The SHLAA has been completed and is published on the Council's website. It is also notable that this Council has also published a formal technical document on the Five Year Housing Land Supply picture. This latter document (also on the website) indicates that whilst under the present Wiltshire and Swindon Structure Plan housing requirement this Authority has more than sufficient quantities of housing, once the RSS is published, it will have less than five years supply. Therefore, both documents are being examined by potential housing developers as evidence of a need to grant planning permission for more housing land beyond that currently allowed for in the North Wiltshire Local Plan 2011.
- 3.30 **Action:** For information only. No action is required

The Strategic Flood Risk Assessment

- 3.31 Planning Policy Statement 25 recommends that all planning authorities undertake a Strategic Flood Risk Assessment to inform their plans.
- 3.32 Stage 1 of the SFRA has been completed and discussions are taking place with the consultants over the progressing of Stage 2. This latter more detailed flood risk assessment work will be a major contribution to the future Planning policies of Wiltshire.
- 3.33. **Action:** For information only. No action is required

Other Conservation Area related Supplementary Planning Documents

- 3.34 Work on this SPD has been suspended, pending the production of a new Wiltshire LDS. It is noted that as some of these documents have reached an advanced stage of preparation, that there is an argument that they should be

completed as part of the NWDC's Local Development Framework. A short presentation on this subject will be given at the meeting.

- 3.35 **Action:** The views of SPAG members would be welcome.

The Chippenham Traffic Model Update

- 3.36 A Chippenham Traffic Model has been commissioned to address the need for evidence on the likely impact of growth in the Chippenham area road network. It is now complete. A demonstration of the model and its potentially important contribution to the development of Chippenham will be presented at the meeting.
- 3.37 Initial indications are that the model performs well and is a realistic view of traffic conditions in the town.
- 3.38 However, the main purpose of the data is to undertake the computer modelling work required for the allocation of new housing and other development land at Chippenham.
- 3.39 **Action:** For information only. No action is required

4. The Future Development of Chippenham and its broader implications

- 4.1 The Modifications to the Regional Spatial Strategy include a requirement for the allocation of 5500 dwellings and at least 12 hectares of employment land in Chippenham up to 2026. This is likely to become established regional planning policy by early next year.
- 4.2 The allocation of strategic housing land will be part of the purpose of the new Wiltshire Core Strategy which will be completed sometime in 2010/11. However, in the meantime, as indicated in the previous section, there will be pressure from development companies to consider early planning applications to allow the delivery of new housing during the next few years.
- 4.3 In order to plan for this eventuality, the Spatial Planning Team have been preparing the following response.
- The production of a *Planning Policy Position Paper for North Wiltshire* which sets out the background that will allow decision makers to make an informed judgement about new development proposals.
 - The production of a *Development Management Note for Chippenham* which suggests where new development would best be located and the community infrastructure that will be needed when considering any major planning applications in the town.
- 4.4 These notes will not be planning policy in themselves, but will be evidence that will be available for the new Wiltshire-wide Core Strategy work that will ultimately include such policy.
- 4.5 The DMN for Chippenham will be completed shortly and a presentation on the work concluded so far will be given to the meeting. The DMN will be placed before this Council's Executive meeting in November for consideration.

- 4.6 If agreed for that purpose, it will be the subject of a six week public consultation period which will follow the Council's normal Statement of Community Involvement procedures.
- 4.7 The Executive will then be in a position to adopt the document as informal planning guidance as modified in the light of the consultation responses in January 2009. During this time, it is expected that a number of the potential developers of this expansion of Chippenham will be undertaking consultations on their proposals ready for submission as planning applications in January 2009.
- 4.8 **Action:** Members of SPAG are invited to make comment on any matters arising from the presentation and the timetable that they would wish to be taken into account.

APPENDIX A

The Draft Revised RSS for the South West Incorporating the Secretary of State's Proposed Changes: Summary and Implications for North Wiltshire

The Draft Revised RSS for the South West was published for consultation on 22nd July 2008, and includes the Secretary of State's (SoS) proposed changes to the Draft RSS. This follows the Examination in Public of the Draft RSS held between April and July 2007, and the panel report published in January 2008. The Draft Revised RSS is open for consultation until 17th October 2008. This summary document outlines the proposed changes to the RSS, and highlights the likely implications of these for North Wiltshire. Section 1 of the Draft Revised RSS contains four policies on Sustainable Development (SD1-SD4); these policies have not been changed significantly, and thus are not examined here. Section 2 of the Draft RSS has been deleted in its entirety. This summary therefore begins with an outline of the proposed changes to Section 3.

Section 3: The Spatial Strategy and Guidance for the Scale and Location of Development

Policy CSS: The Core Spatial Strategy

The Draft Revised RSS includes the recommendation that a new policy be included, which sets out the general position regarding development in the region. Policy CSS states that "most new development will be provided for at Strategically Significant Cities and Towns (SSCTs)" and that "Provision for more limited development will be made at market and coastal towns and in small towns and villages where this will increase self-containment and promote stronger communities".

Implications for North Wiltshire: Chippenham is identified in Development Policy A as an SSCT, and thus will be a focus for growth in the district. Development at the smaller market towns in North Wiltshire (Calne, Corsham, Cricklade, Malmesbury and Wootton Bassett) will need to be considered in the light of the requirements that it promotes 'self-containment' and 'stronger communities'.

Paragraph 3.2.3

Paragraph 3.2.3 is amended to clarify the RSS position that Development Policies A, B and C "do not set out a sequential or 'cascade' approach to the location of development", and that the development needs of each class of settlement should be considered separately.

Implications for North Wiltshire: Development needs of Chippenham should not be met in the five smaller market towns, and development needs of these towns should not be met in the villages of the district.

Development Policy A: Development at Strategically Significant Cities and Towns (SSCTs)

This policy is amended to include clarification on the role of the SSCTs in providing "housing, employment, cultural, education, retail, health and other services and facilities" and in acting as "strategic hubs for public transport". Objectives for the SSCTs are outlined, including: "improving the quality of the urban environment"; "promoting social cohesion"; "supporting growth in the economy"; "securing improvements to public transport"; and "making efficient and effective use of land".

Implications for North Wiltshire: The above roles and objectives will need to be considered when planning for future development in Chippenham.

Development Policy B: Development at Market and Coastal Towns

This policy states that certain Market and Coastal Towns will be appropriate locations for development which serves to "increase their self-containment and enhance their roles as service centres". The wording of the policy has been amended but the content is not significantly altered.

Implications for North Wiltshire: To note the change of wording.

Development Policy C: Development at Small Towns and Villages

Paragraph 3.5.1 is amended to include the statement that "the smaller towns and villages identified in LDDs will be the primary focus for development in the wider countryside away from Policy A and B settlements". Development Policy C states that "greater self-containment and stronger local communities" will be promoted in the Small Towns and Villages, providing that certain criteria are met.

Implications for North Wiltshire: LDDs will need to identify small towns and villages which are appropriate locations for development outside the Policy A and B settlements, and provide detailed criteria to be met before development is permitted. This may also be relevant in the production of the Development Management Notes, which will assist development control decisions in the district.

Development Policy D: Infrastructure

This policy has been re-written, with a focus on the need to provide essential infrastructure "in step with development". New supporting text highlights the importance of providing both 'hard' and 'social' infrastructure, with examples including roads (hard) and community services (social).

Implications for North Wiltshire: Note the change of emphasis in the re-drafted policy.

Development Policy E: High Quality Design

This policy has been amended to remove the requirement that "all new, replacement and refurbished public buildings should be designed to have multiple uses as far as possible". The distinction between public and private buildings is removed because no justification was provided in the Draft RSS for such a distinction.

Implications for North Wiltshire: To note the change to the policy.

Development Policy F: Planning and delivery of major development

Development Policy F has been re-written to improve clarity and to avoid repetition of content elsewhere in the RSS. Reference to specific development densities has been removed. The new policy requires that the planning of major new development should include consideration of the need for: "high standards of design and access"; adequate provision of services and facilities; "sustainable transport links between urban extensions and city/town centres"; "amenity space and green infrastructure"; and "a range of housing types and tenures".

Implications for North Wiltshire: To note the changes to the policy.

Development Policy G: Sustainable Construction

The Panel had originally recommended that this policy should be amended to include endorsement of "the accelerated introduction of more demanding standards of building sustainability on a region wide basis", but this suggestion has been rejected by the SoS. Instead the re-drafted Development Policy G includes the statement that: "When proposing any local requirements for sustainable buildings, local planning authorities must be able to demonstrate clearly the local circumstances that warrant and allow this and set them out in Development Plan Documents". This is in line with national guidance set out in the *Planning Policy Statement: Planning and Climate Change – Supplement to PPS1*.

Other changes to the policy include the removal of references to 'Future Foundations' the *South West Sustainable Construction Charter*, and the *South West Sustainability Checklist for Developments*, in order to avoid delegating "the basis for decision making to documents that have not been the subject of scrutiny through the RSS process". The requirements for developments to achieve specific levels in the Code for Sustainable Homes have also been removed, in order to clarify the fact that the RSS is not establishing a set of regional regulations.

Implications for North Wiltshire: If the district wishes to introduce sustainable construction standards above those set at the national level, then it will be necessary for this approach to be fully justified in a Local Development Document.

Development Policy H: Re-using Land

Development Policy H has been amended to state that the target for the region will be to locate "at least 50% of new *housing* development on previously developed land (including the conversion of existing buildings)". This is a change from the Draft RSS where there was no specific focus on housing development. There has also been another alteration to the wording of the policy, in that the reference to 'local authorities' has been removed, in order to clarify the fact that all relevant bodies (and not just local authorities) should address the need for the re-use of land.

Implications for North Wiltshire: To note the changes in the wording of the policy.

Development Policy I: Reuse, Redevelopment or Disposal of Land

Development Policy I has been deleted following the panel's recommendation that it was unnecessary.

Implications for North Wiltshire: To note the deletion of the policy

Development Policy J: Joint Working

Development Policy J has been deleted; issues of joint-working are covered in Section 4 instead.

Implications for North Wiltshire: To note the deletion of the policy.

Section 4: Sub-regional Housing Policies

Section 4 has been completely re-structured, with specific policies focusing on each of the Sub-regional Housing Market Areas (HMA). North Wiltshire falls within the Swindon HMA.

Paragraph 4.09 contains information on joint working which was previously covered by Development Policy J. It is stated that North Wiltshire should work together with Swindon Borough Council and Wiltshire County Council when preparing policies and strategies.

Policy HMA2: Swindon HMA

Policy HMA2 states that "In the Swindon HMA provision will be made for: growth of about 42,700 jobs" and at least 53,900 homes. North Wiltshire will need to provide 13,700 homes, including at least 5,500 dwellings in Chippenham, and 3,000 homes to the west of Swindon. About 6,200 jobs should be provided for in the Chippenham TTWA, including provision of about 42 ha of employment land. Policy HMA2 also states that "Action should be taken to improve movement and accessibility" for the West of Swindon – Swindon Town Centre transport corridor; and emphasises the need for Chippenham to "enhance its role as an employment and service centre to meet the needs of a growing population and increase its self-containment".

Policy HD1: Sub-Regional Distribution of Housing 2006-2026: Managing and Stepping Up Supply

Policy HD1 and the accompanying tables (4.1 and 4.2) state that the Annual Average Net Dwelling Requirement for North Wiltshire is 685 dwellings for the entire plan period (2006-2016), whilst the requirement for Chippenham is 275 dwellings (2006-2026). Policy HD1 states that "Local Planning Authorities should complete Strategic Housing Land Availability Assessments (SHLAA) as evidence for LDFs" and that they should "ensure a 15 year supply of land for housing, including a 5 year supply of specific, deliverable sites"; and identify broad locations for housing in LDFs.

Implications for North Wiltshire: Policy guidance is needed regarding a direction of growth for Chippenham and the other settlements in the district. The latest *Statement of Five Year Land Supply for Housing* for North Wiltshire was published in April 2008; this document highlights a shortfall in housing land when compared to the increased requirement for 5,000 dwellings to be provided in Chippenham. The deficit in the town will now be greater than that outlined in the Five Year Land Supply Statement, given the requirement for 5,500 dwellings. Work on the Core Strategy has now stopped in preparation for the change over to One Council. A series of Development Management Notes will therefore be produced, to assist Development Control in determining any planning applications that are submitted for Chippenham and the other settlements.

Table 4.3: Gypsy and Traveller Additional Pitch Requirements to 2011

Table 4.3 outlines the additional residential and transit pitch requirements for local authorities to 2011. The requirements for North Wiltshire are:

Residential Pitch Requirement – 48; Transit Pitch Requirement – 12

Implications for North Wiltshire: The Residential Pitch Requirement for North Wiltshire has increased from 24 (Wiltshire and Swindon GTAA, 2006) to 48

(Draft Revised RSS). The Wiltshire and Swindon GTAA also found that there was no requirement for additional transit pitches, whilst the RSS requirement is for 12 pitches up to 2011. This issue remains to be analysed further.

Section 5: Regional Approach to Transport

Section 5 has been completely re-written, and the previous Section 5 deleted. Policies relevant to North Wiltshire are outlined below.

Policy RTS1: Corridor Management

This policy identifies transport corridors of National and Regional Importance. **The National corridor from London-South Wales passes through North Wiltshire, and the district will therefore need to take account of this when producing planning policy.**

RTS2: Demand Management and Sustainable Transport Measures at the SSCTs

This policy states that "Demand management measures should be introduced progressively at the SSCTs to reduce the growth of road traffic levels and congestion. This should be accompanied by a 'step change' in the prioritisation of sustainable transport measures serving these places".

This will be relevant in Chippenham which is identified as an SSCT.

RTS3: Parking

This policy outlines the approach to parking to be taken by local authorities, including the need to have policies for Parking Standards, Parking Provision and Parking Charges.

North Wiltshire will need to note the new policy.

RTS4: Freight and the Primary Route Network

Policy RTS4 highlights the importance of promoting the primary route network for use by HGVs.

The primary route network includes Motorways and Trunk Roads; Policy RTS4 will therefore be relevant with regards to these roads in North Wiltshire.

Section 6: Harnessing the Benefits of Population Growth and Managing the Implications of Population Change

Policy H1: Housing Affordability

The percentage of affordable housing required annually across each local authority is increased from 30% (Draft RSS) to 35% (Revised Draft RSS). It is also emphasised that local authorities should set local targets in Development Plan Documents.

Implications for North Wiltshire: The increase in the affordable housing requirement to 35% will need to be incorporated into future DPDs.

Policy H2: Housing Densities

Policy H2 has been rewritten. It is stated that the following densities should be achieved:

An average net density of 40 dwellings per hectare or above across HMAs
 Net density of between 40 and 50 dwellings per hectare for new development in SSCTs

Net densities of 50 or more dwellings per hectare in urban extensions to the SSCTs.

Implications for North Wiltshire: The above densities will be relevant for new development in Chippenham and in the West of Swindon area.

H3: Mix of Housing

This is a new policy which states that "LDDs should include policies which require an appropriate range and mix of housing". This should be based on evidence regarding the "likely profile of housing types requiring market housing"; "the size and type of affordable housing required"; and "the need to adapt the existing housing".

Implications for North Wiltshire: To note the new policy.

GT1: Gypsy and Traveller Pitch Requirements

Policy GT1 requires local authorities to provide for additional Gypsy and Traveller pitches, as outlined in Table 4.3. The requirements for North Wiltshire are 48 Residential Pitches and 12 Transit Pitches up to 2011. It is also stated in Policy GT1 that "Where it is appropriate to make provision beyond 2011 and other data is not available, provision should allow for a 3% compound growth in requirements per annum" and that local authorities "should take account of the specific needs of different groups of Gypsies and Travellers in making site allocations".

Implications for North Wiltshire: As mentioned above, the Residential Pitch Requirement for North Wiltshire is double that found to be required by the Wiltshire and Swindon GTAA, and the Transit Pitch Requirement has increased from 0 (Wiltshire and Swindon GTAA) to 12 (Draft Revised RSS).

GT2: Travelling Show People Pitch Requirements

Policy GT2 is a new policy which requires that local authorities identify appropriate sites for additional plots for Travelling Show People. The plot requirements are outlined in Table 4.4 on a county wide basis, with Wiltshire needing to provide 5 plots by 2011.

Implications for North Wiltshire: To note the new policy.

The Remaining Policies in Section 6

The remaining policies in Section 6 have been amended as follows: HE1 (Planning for Healthcare); HE3 (Promoting Health); SK1 (Education and Skills); and GI1 (Green Infrastructure) all have minor changes only. HE2 (Provision of Additional Healthcare Facilities) and LCF1 (Local Cultural Facilities) are deleted.

Section 7: Enhancing Distinctive Environments and Cultural Life

The majority of the policies in Section 7 are either unchanged, or have minor amendments to improve clarity. However, the following changes may be relevant for North Wiltshire:

Policy ENV1 (Protecting and Enhancing the Region's Natural and Historic Environment) has been extended to provide greater detail on the treatment of N2K sites.

Policy F1 (Flood Risk) has been amended slightly to include reference to the Regional Flood Risk Assessment.

Policies RE5 (Decentralised Energy to Supply New Development) now includes the statement that "Local planning authorities should set targets in their DPDs for the energy to be used in new development to come from decentralised and renewable or low-carbon energy sources where it is feasible and viable, and the development thresholds to which such targets would apply". Before the relevant DPDs are adopted, an interim target of "at least 10% of the energy to be used in new development of more than 10 dwellings or 1000m² of non-residential floorspace should come from decentralised and renewable or low-carbon sources".

Policy RE9 (Air Quality) has been amended to include the statement that LDDs should "include consideration of the potential impacts of new developments and increased traffic levels on internationally designated nature conservation sites".

Implications for North Wiltshire: To note the changes to the above policies.

Section 8: Enhancing Economic Prosperity and Quality of Employment Opportunity

ES1: Sustainable Economic Prosperity

This is a new policy, which sets out the need for Local Authorities to "include measures in their LDDs to promote a switch from employment-led to productivity-led growth". The need to locate development so as to reduce the need to travel is also highlighted.

Implications for North Wiltshire: It will be necessary to incorporate the measures outlined in Policy ES1 within future LDDs for the district.

ES2: Providing for Employment Land and Premises and Policy ES3: Review of Employment Sites

Policies E1, E2, E3 and E4 in the Draft RSS have been deleted and are replaced by Policies ES2 and ES3. Policy ES2 sets out the requirements for local authorities with regards to the provision of employment land. Local authorities should identify "a 20 year supply of employment land, including strategic sites"; and these should support "the ongoing development of the SSCTs"; "a better balance between the location of jobs and housing"; and the achievement of other objectives as listed in Policy ES2. Policy ES3 states that "The supply of land should be critically reviewed ... on a three year rolling basis".

Implications for North Wiltshire: It will be necessary to ensure that sufficient employment land is available across the district, but particularly in Chippenham which is an SSCT. This will be relevant for the Development Management Note series.

TC1: City and Town Centres

This policy has been amended to include the statement that "The central areas of the SSCTs will also be the prime location for office development (B1a), which is not related to other commercial uses".

TC2: Other Centres

This is a new policy which outlines the position with regards to retail development outside the SSCTs. The general presumption is against development, unless the new retail facilities "complement rather than compete with the retail facilities in the relevant strategic centre".

Implications for North Wiltshire: Policies TC1 and TC2 will need to be considered when planning development in Chippenham and the other town centres of the district.

TO1: Sustainable Tourism; TO2: Safeguarding and Investing in Tourist Locations; and TO3: Major New Tourism Facilities.

Policies TO1, TO2 and TO3 have all been completely rewritten in the Draft Revised RSS. Policy TO3 states that "Major new tourism facilities should be located within, or close to, SSCTs".

Implications for North Wiltshire: To note the re-written policies.

Section 9: Addressing Deprivation and Disadvantage to reduce Intra-Regional Inequalities

ADD1: Priorities for Addressing Deprivation and Disadvantage

This new policy outlines the approach to be taken in order to address inequalities across the region. It is stated that "LDDs should identify and seek to address pockets of deprivation at the neighbourhood level in both urban and rural communities".

Implications for North Wiltshire: To note the new policy.

Relevant Documents:

The South West Regional Spatial Strategy: Schedule of the Secretary of State's Proposed Changes and Reasons. Available at:
http://gosw.limehouse.co.uk/portal/schedule_of_proposed_changes_and_reasons/

The Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes. Available at:
http://gosw.limehouse.co.uk/portal/regional_strategies/drss

APPENDIX B

Additional Statement on Gypsy and Traveller Provision in the Modifications to the Regional Spatial Strategy – September 2008.

Introduction

The *Draft Revised Regional Spatial Strategy for the South West* (Draft Revised RSS) was published for consultation on the 22nd July 2008, and includes proposed changes to the Gypsy and Traveller Pitch Requirements for North Wiltshire. These changes are presented in Tables 4.3 and 4.4 of the *Draft Revised RSS*, and are as follows:

1. That the Gypsy and Traveller Residential Pitch Requirement for North Wiltshire be increased from 24 pitches (as found to be required by the *Wiltshire and Swindon Gypsy and Traveller Accommodation Assessment (GTAA)*) to 48 pitches.
2. That the Transit Pitch Requirement for North Wiltshire be increased from 0 (*Wiltshire and Swindon GTAA*) to 12 pitches.
3. That the Travelling Show People Pitch Requirements for the whole of Wiltshire be increased to 5 pitches.

The changes to the Transit and Travelling Show People Pitch Requirements are not disputed. However, the increases to the Residential Pitch Requirements appear to be based upon a somewhat arbitrary calculation of need, and do not reflect the findings of the *Wiltshire and Swindon GTAA*. There is also an issue regarding the distribution of sites amongst the Wiltshire and Swindon Local Authorities, with North Wiltshire receiving a disproportionate allocation. The arguments against the revised residential pitch requirements are outlined in greater detail below, following a brief overview of the background regarding Gypsy and Traveller Pitch Provision in North Wiltshire.

Gypsy and Traveller provision in North Wiltshire

The *Wiltshire and Swindon GTAA* was undertaken by David Couttie Associates (DCA) and published in 2006. The *GTAA* found a need for 47 additional residential pitches Wiltshire in the period 2006-2011, with 24 of these pitches to be located in North Wiltshire. In 2008 North Wiltshire District Council (NWDC) undertook an *Issues and Options Consultation* concerning the suitability of six publicly owned sites for Gypsy and Traveller Provision. Following extensive public consultation, the NWDC Executive agreed that none of the six sites were suitable. The *Issues and Options Consultation* also involved a 'Call for Sites'; analysis of the results of this site search is still ongoing. Given the difficulty experienced by NWDC in finding suitable sites for Gypsy and Traveller Provision, and the controversial nature of the issue, it is essential that the RSS Pitch Requirements accurately reflect local need.

Background to the Proposed Changes in the Draft Revised RSS

A draft *RSS Revision (Gypsies and Travellers)* was published in July 2007, and was subject to an Examination in Public in March 2008. This was followed by the publication in April 2008 of the *Independent Panel Report on the Review of Additional Pitch Requirements for Gypsies and Travellers in the South West (the RAPR Panel Report)*. The *RAPR Panel Report* suggested changes to the residential pitch requirements in North Wiltshire, and these changes have been incorporated into the *Draft Revised RSS*.

The justification for the proposed changes is based around the argument that the *Wiltshire and Swindon GTAA* did not accurately assess the need in the county. The *RAPR Panel Report* cites a *Benchmarking Report*, produced by the Universities of Birmingham and Salford and published in January 2008, which argues that the *Wiltshire and Swindon GTAA* figures are too low. It is stated in the *Benchmarking Report* (p.20) that there are "serious reservations about the approach to estimating need [in the *Wiltshire and Swindon GTAA*] which seems likely to consistently understate the level of requirement for residential pitches". These reservations include issues regarding "the derivation of the base population, treatment of need from unauthorised sites and assumed future vacancy levels." The *Benchmarking Report* therefore recommended that the figures should be amended.

The Formula

The proposed residential pitch requirements (in the *Draft Revised RSS*) have been calculated according to a formula presented by the DCLG in the 2007 guidance document: *Preparing Regional Spatial Strategy Reviews on Gypsies and Travellers by Regional Planning Bodies*. The formula for pitch requirements is as follows: "Pitch requirement for an area equals the number of unauthorised development pitches in the area plus 40 per cent of the number of authorised pitches in the area" (p.37). The formula has been derived based on an examination of GTAAs in the East of England. Five GTAA's were analysed, to determine the extent to which the methodology followed was likely to lead to an accurate estimate of pitch requirements. Of these five GTAAs, one was found to have an accurate methodology, and this GTAA gave an estimated pitch requirement of 43% of authorised pitches (p.38).

Thus, the formula was derived using the figure of 40%. However, since this formula is based on the situation in the East of England, it is not necessarily applicable to Wiltshire and Swindon. The DCLG accepts that "the formula can be criticised" and that it is "essentially pragmatic and devised for its simplicity rather than its sophistication" (*Preparing RSS Reviews on GTAAs*, p.39).

Amendments to the Formula

It should also be noted that the formula is amended in the *Benchmarking Report*, which increases the overall need for Wiltshire to 99 pitches (from 93 pitches following the original formula). It is stated in the *Benchmarking Report* that the "amendments to the formula are to an extent arbitrary although considered in the context of the findings of robust GTAAs" and that the figures should only be used as an interim measure, until the GTAA can be updated.

The *Benchmarking Report* amendments to the formula do not have a huge impact on the figure, but it can nonetheless be argued that both the formula itself, and the *Benchmarking Report* amendments, appear to have been derived in an arbitrary fashion, with insufficient justification. They do not reflect the complexity of local

circumstances. In contrast, the *Wiltshire and Swindon GTAA* followed a robust methodology, and accurately reflects the local situation, as clarified further below.

The Wiltshire and Swindon GTAA

In 2008 a *Supplementary Paper* was released, which justifies the GTAA in response to criticisms outlined in the *Benchmarking Report*. The *Supplementary Paper* argues that the *Benchmarking Report* “concentrates on the factual data contained in each GTAA and does not take into account specific local circumstances” (p.1). The *Supplementary Paper* provides evidence against each of the specific criticisms levelled at the GTAA, and concludes that “it is the local circumstances in Wiltshire that have influenced and support the conclusions of the Wiltshire and Swindon GTAA”. It is nevertheless accepted in the *Supplementary Paper* that the GTAA pitch requirement should be amended, to take account of small inaccuracies in the GTAA. Thus the Wiltshire Pitch Requirement should be increased to 52 (from 47 in the GTAA), and the requirement for North Wiltshire should be increased to 26 (from 24 in the GTAA). Once these small amendments are taken into account, the GTAA provides a robust assessment of need in Wiltshire and Swindon.

Distribution of Pitches

It is not accepted that the increases proposed in the *Draft Revised RSS* for the Wiltshire and Swindon pitch requirements are justifiable. However, even if the increases were accepted, the issue of distribution of the pitch requirements amongst local authorities remains. The *RAPR Panel Report* advises that the additional pitches required (an extra 52 pitches for Wiltshire) are to be distributed throughout the authorities on a pro-rata basis, based on the original figures proposed by the *Wiltshire and Swindon GTAA*. The only exception is that Kennet should receive 5 pitches (original requirement was 0); the remaining 47 additional pitches are distributed amongst Swindon, North Wiltshire, Salisbury and West Wiltshire, and the requirement for each of these authorities is thus double that recommended by the GTAA. North Wiltshire must provide 48 pitches.

The justification for pro-rata distribution is that this “will be more likely to reflect where needs are likely to exist and/or arise in the period up until 2011” (*RAPR Report*, p.34). However, the GTAA recommendation for North Wiltshire to provide 24 pitches includes provision for 16 pitches “to accommodate relocation of the Minety site” (GTAA, p.101). This relocation of an unauthorised site is a special circumstance, and will only occur once. The *RAPR Panel Report* suggestion that North Wiltshire should provide an additional 24 pitches would allow for the relocation of the Minety site twice and thus effectively double-counts one element of the need in North Wiltshire. The pro-rata distribution of the additional sites is not therefore justified.

A further point to note is that North Wiltshire will cease to exist as a local authority as of April 2009, when the new Wiltshire Unitary Authority comes into being. In the light of this shift towards One Council, a county-wide view is necessary. Thus, regardless of the numbers concerned, there appears little point in specifying a North Wiltshire requirement at this time.

Summary

It has been argued above that the *Draft Revised RSS* proposed increases to the Gypsy and Traveller Pitch Requirements for Wiltshire and Swindon, and specifically for North Wiltshire, are not justified. The *Wiltshire and Swindon GTAA*, carried out in 2006, provides an accurate assessment of local need. This is highlighted by the *Supplementary Paper*, which was prepared in response to the criticisms of the GTAA

outlined in the *Benchmarking Report*. The proposed figures in the *Draft Revised RSS* are derived using a formula which was based on the situation in the East of England and may not therefore be applicable to North Wiltshire. This formula has been amended slightly following recommendations in the *Benchmarking Report*, but these amendments are derived on a somewhat arbitrary basis, as acknowledged by the authors of the *Benchmarking Report* themselves.

The distribution of pitch requirements across the individual authorities of Wiltshire and Swindon is based upon figures provided in the GTAA, and the figure for North Wiltshire is thus heavily biased. The GTAA recognises the need to replace unauthorised sites at Minety in North Wiltshire, but the *Draft Revised RSS* figures would effectively replace these sites twice.

It is therefore recommended that the Gypsy and Traveller Pitch Requirements should be amended to follow those set out in the *Supplementary Paper to the Wiltshire and Swindon GTAA*. This sets the overall Residential Pitch Requirement for Wiltshire and Swindon at 52, with 26 pitches to be provided by North Wiltshire.

Relevant Documents:

Benchmarking Review of Gypsy and Traveller Accommodation Assessments in the South West (January 2008) http://www.southwest-ra.gov.uk/nqcontent.cfm?a_id=3593

Circular 01/06 (ODPM) Planning for Gypsy and Traveller Caravan Sites (2006) <http://www.communities.gov.uk/publications/planningandbuilding/circulargypsytraveller>

Gypsy and Traveller Accommodation Needs Assessments: Guidance – DCLG, Oct 2007 <http://www.communities.gov.uk/documents/housing/pdf/accommneedsassessments.pdf>

North Wiltshire Gypsy and Traveller Issues and Options Consultation (May-June 2008)

<http://www.northwilts.gov.uk/index/env/planning/localplans/gypsyconsultation.htm>

Preparing Regional Spatial Strategy reviews on Gypsies and Travellers by regional planning bodies (DCLG, 2007)

<http://www.communities.gov.uk/documents/housing/pdf/321445.pdf>

RSS for the South West Review of Additional Pitch Requirements for Gypsies and Travellers EiP Report of the Panel (April 2008)

<http://www.gos.gov.uk/497666/docs/166217/622079/fullpanelreport>

Supplementary Paper to Wiltshire County and Swindon Borough Gypsy and Traveller Accommodation Needs Assessment Final Report 2006 (Wiltshire County Council and Swindon Borough, Jan 2008)

http://www.planning-inspectorate.gov.uk/pins/rss/south_west_gypsy/documents/CD36.pdf

The Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes

http://gosw.limehouse.co.uk/portal/regional_strategies/drss

The South West Regional Spatial Strategy: Schedule of the Secretary of State's Proposed Changes and Reasons

http://gosw.limehouse.co.uk/portal/schedule_of_proposed_changes_and_reasons/

Wiltshire and Swindon Gypsy and Traveller Accommodation Needs Assessment (2006) http://www.northwilts.gov.uk/wiltshire_swindon_final_report_07-2.pdf

APPENDIX C

Draft Letter to the South West Regional Assembly – Reponse of NWDC to the Modifications to the Regional Spatial Strategy.

Enquiries to: Mr. L. Robertson

Date: xx October 2008

Chief Executive: Delwyn Burbidge

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Dear Sir/Madam

North Wiltshire District Council – Response to the Secretary of States’s Response to the Regional Spatial Startegy for the South West

Thank you for your letter and documents received 1st August 2008. I have enclosed a set of completed response forms accordingly.

Please note that this Authority supports the content of the Regional Spatial Strategy for the South West with one exception. That exception relates to the proposal for the number of Gypsy and Traveller pitches for the North Wiltshire area to which this Authority has a strong objection.

The reasoning behind this objection is attached to this letter. North Wiltshire District Council requests in the most emphatic terms that the Regional Spatial Strategy be amended accordingly.

Yours sincerely,

Lachlan Robertson – Head of Policy and Performance - NWDC