

## AGENDA

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**Meeting:** Environment Select Committee

**Place:** Council Chamber - Council Offices, Monkton Park, Chippenham, SN15 1ER

**Date:** Monday 11 June 2012

**Time:** 10.30 am

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Please direct any enquiries on this Agenda to Kieran Elliott, of Democratic Services, County Hall, Bythesea Road, Trowbridge, direct line 01225 718504 or email [kieran.elliott@wiltshire.gov.uk](mailto:kieran.elliott@wiltshire.gov.uk)

Press enquiries to Communications on direct lines (01225) 713114/713115.

This Agenda and all the documents referred to within it are available on the Council's website at [www.wiltshire.gov.uk](http://www.wiltshire.gov.uk)

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### Membership:

Cllr Chuck Berry  
Cllr Rosemary Brown  
Cllr Nigel Carter  
Cllr Christopher Cochrane  
Cllr Peter Doyle  
Cllr Jose Green  
Cllr Alan Hill

Cllr Jon Hubbard  
Cllr Chris Humphries  
Cllr Tom James MBE  
Cllr Ian McLennan  
Cllr Stephen Oldrieve  
Cllr Leo Randall

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### Substitutes:

Cllr Jane Burton  
Cllr Trevor Carbin  
Cllr Brian Dalton  
Cllr Bill Douglas  
Cllr Nick Fogg  
Cllr Russell Hawker  
Cllr Charles Howard

Cllr George Jeans  
Cllr David Jenkins  
Cllr Julian Johnson  
Cllr Jeffrey Ody  
Cllr Ricky Rogers  
Cllr Anthony Trotman

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# **AGENDA**

## **PART I**

**Items to be considered whilst the meeting is open to the public**

1 **Membership**

To report the membership appointed by the Council (as printed on the front page).

2 **Apologies**

To receive any apologies for absence.

3 **Election of Chairman**

To elect a Chairman for the ensuing year.

4 **Election of Vice-Chairman**

To elect a Vice-Chairman for the ensuing year.

5 **Declarations of Interest**

To receive any declarations of personal or prejudicial interests or dispensations granted by the Standards Committee.

6 **Chairman's Announcements**

To receive any announcements through the Chair.

7 **Public Participation**

The Council welcomes contributions from members of the public.

**Statements**

If you would like to make a statement at this meeting on any item on this agenda, please register to do so **at least 10 minutes prior to the meeting**. Up to 3 speakers are permitted to speak for up to 3 minutes each on any agenda item. Please contact the officer named above for any further clarification.

## Questions

To receive any questions from members of the public or members of the Council received in accordance with the constitution. Those wishing to ask questions are required to give notice of any such questions in writing to the officer named above no later than **5pm** on **31 May 2012**. Please contact the officer named on the first page of this agenda for further advice. Questions may be asked without notice if the Chairman decides that the matter is urgent.

Details of any questions received will be circulated to Committee members prior to the meeting and made available at the meeting and on the Council's website.

### 8 **Terms of Reference** *(Pages 1 - 4)*

- i) To note the terms of reference for the Environment Select Committee as agreed by Full Council on 15 May 2012 as follows:
  - Deliver the environmental services elements of the overall work programme (as directed by the Management Committee) in line with the articles and overview and scrutiny procedure rules set out in the Constitution;
  - Report and make recommendations to the Management Committee through its minutes;
  - Establish ad hoc task groups;
  - Six meetings per year will be fixed in the Council diary.
- ii) To receive details of the new arrangements agreed by Council on 15 May in the form of a revised structure chart and summary of improvements and developments.

### 9 **Legacy Issues and Future Work Programme** *(Pages 5 - 8)*

A discussion document will be presented to the Overview & Scrutiny Management Committee at its first meeting to be held on 30 May 2012. This is attached for information and an update will be given at the meeting.

A copy of the outstanding items from the previous select committee is attached for reference.

### 10 **Wiltshire Core Strategy** *(Pages 9 - 126)*

To scrutinize the draft Wiltshire Core Strategy ahead of adoption by full Council.

A report is attached with a schedule of changes along with responses to

consultation and key issues.

Hard copies of the Core Strategy will be available on request, or can be found online using the link below:

<http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/wiltshirecorestrategy.htm>

11 **Urgent Items**

Any other items of business which the Chairman agrees to consider as a matter of urgency.

12 **Date of Next Meeting**

To agree the date of the next meeting.

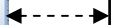
**PART II**

**Items during whose consideration it is recommended that the public should be excluded because of the likelihood that exempt information would be disclosed**

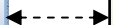
**COUNCIL**



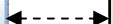
**CABINET**



**AUDIT COMMITTEE**



**AREA BOARDS**



**EVOLVING BODIES:  
HEALTH & WELL-BEING BOARD -  
POLICE AND CRIME PANELS**

Page 1

**OVERVIEW & SCRUTINY MANAGEMENT COMMITTEE**

- Overall management of the OS function in line with the articles and overview and scrutiny procedure rules set out in the Constitution (including call-in of Executive decisions and councillor requests for reviews)
- Co-ordination of the overall work programme (aligned to Council priorities)
- Lead the working relationship with the Executive (based on agreed core values)
- Establish sub-committees/endorse the formation of task groups/appoint representatives to project boards and delegate responsibility as appropriate
- Assign dedicated OS resources (officer team and budget)
- Overview / policy development and scrutiny of policy framework and corporate/organisational matters
- Overview / policy development and scrutiny of Business Plan- annual review & periodic performance monitoring
- Membership should include the chairmen of any standing committees

**BUDGET TASK GROUP (Standing)**

- Review and scrutinise revenue and capital budgets
- Manage the arrangements for the annual overview of budget proposals
- Report periodically to the Management Committee as necessary
- Membership to be drawn from the Management Committee



**HEALTH SELECT COMMITTEE**

- Deliver the health and adult social care elements of the overall work programme (as directed by the Management Committee) in line with the articles and overview and scrutiny procedure rules set out in the Constitution including the statutory powers of Health Scrutiny
- Membership to include co-opted non-voting stakeholder representatives as appropriate
- Report and make recommendations to the Management Committee through its minutes
- Establish ad hoc task groups
- Six meetings per year will be fixed in the Council diary

**CHILDREN'S SELECT COMMITTEE**

- Deliver the children's services elements of the overall work programme (as directed by the Management Committee) in line with the overview and scrutiny procedure rules set out in the Constitution
- Membership to include co-opted voting parent governor and church representatives in accordance with the Constitution
- Report and make recommendations to the Management Committee through its minutes
- Establish ad hoc task groups
- Six meetings per year will be fixed in the Council diary

**ENVIRONMENT SELECT COMMITTEE**

- Deliver the environmental services elements of the overall work programme (as directed by the Management Committee) in line with the articles and overview and scrutiny procedure rules set out in the Constitution
- Report and make recommendations to the Management Committee through its minutes
- Establish ad hoc task groups
- Six meetings per year will be fixed in the Council diary

**OVERVIEW & SCRUTINY TASK GROUPS**



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Council's decision on the review of overview and scrutiny arrangements included the following improvements/developments:

**Core Values** in the working relationship between the Executive and OS functions:

- Mature and harmonious working relationships to provide for open and constructive challenge in the style of a critical friend.
- OS should be an integral part of decision-making in order to minimise delays and frustrations.
- OS should add value to decision-making and focus on the big, important matters to the Council and communities identified in the Business Plan.
- A “two-way street” for communication to enable OS to develop a complementary work programme to that of the Executive.
- Responsible behaviour and sound practices with OS reviews based on evidence (not anecdote or political bias) fairness, respect and courtesy.
- All members and officers should work together to ensure the efficient transaction of OS business.

**Policy and Budget Framework** - OS to be consulted in good time prior to submission for formal adoption in accordance with the Constitution.

**OS Work Programme** to be relevant, balanced, proportionate, timely and outcome focused. Higher proportion of policy development work including cross-cutting themes linked to the Council's priorities in the Business Plan. Overall responsibility of the Management Committee.

**Task Groups** recognised as being both effective and rewarding and therefore to feature prominently in the new arrangements.

**Added Value** to be achieved through concentrating on less topics, more in-depth reviews particularly on matters agreed as priorities with Cabinet.

**Budget Scrutiny** to be dealt with through a dedicated standing task group of the Management Committee.

**Legacy business** - the approach to ongoing legacy business from the old arrangements to be determined by the Management Committee.

**ELT Working Party** to support the implementation of the revised arrangements.

**Further review** in 18 months of the effectiveness of the revised arrangements.

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## REVISED OVERVIEW AND SCRUTINY ARRANGEMENTS

### Approach to Legacy Issues from the previous arrangements

- New select committees to review individual work programmes from the previous arrangements as soon as possible and recommend legacy topics to the Management Committee - justifying priority linked to the Business Plan
- Review to be undertaken in consultation with relevant Cabinet Member and corporate/service director(s)
- Any priority items that cannot wait for the above review to be dealt with by the select committee at its first meeting

### Approach to development of future Work Programme

- Single work programme for the function overall controlled by the Management Committee – style/layout to be determined
- To be developed in consultation with the Cabinet and CLT/ELT linked to the Business Plan (focusing on policy development and outcomes – what's not how's)
- Select committees to recommend content subject to endorsement by the Management Committee
- Relevant Chairman and Vice-Chairman to set agendas for select committees based on agreed work programme (other communication sources to be used for information/progress items)
- Limit to be placed on the number of task groups to be running at any one time matched to resources and councillor capacity
- Use of “evidence” to develop work programme:
  - Business and Financial Plans
  - “Fishbone” Programme list
  - Performance scorecards (to Cabinet)
  - Cabinet Forward Work Plan
  - Operating Model and Cross-Cutting Themes
  - CLT 90 Day Objectives
  - Invitations by Executive
  - Member requests (including CCfA and Call-in)
  - Audit Committee Work Plan

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## Overview & Scrutiny

### Environment Select Committee Work Programme

SUBJECTS	COMMITTEE/ TASK GROUP	NEXT DATE TO O & S COMMITTEE	SPECIFIC ISSUES FOR DISCUSSION	REPORT AUTHOR	CABINET MEMBER/ PORTFOLIO HOLDER
Community Infrastructure Levy	Committee	2012	To monitor implementation of the CIL	Georgina Clampitt-Dix	Cllr Toby Sturgis
Low Carbon Transition Plan	Committee	2012	To receive details once available.	Ariane Crampton	Cllr Toby Sturgis
Renewable Energy Plan	Committee	2012	To receive details once available.	Ariane Crampton	Cllr Toby Sturgis
Street Lighting Savings	Committee	2012	To consider a report on Street Lighting Savings ahead of adoption at Cabinet.	Peter Binley	Cllr Dick Tonge
Development Services Transformation Programme PID	Committee	2012	To receive a quarterly update report.	Brad Fleet	
Highways and Amenities Contract Update	Committee	2012	To receive an update on the award of the Highways and Amenities Contract	Alistair Cunningham	Cllr Dick Tonge
Air Quality Update	Committee	2012	To receive an update	Ariane Crampton	Cllr Toby Sturgis
Waste Contracts	Committee	2012	To receive updates on the procurement of waste contracts		Cllr Dick Tonge

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**Wiltshire Council**

**Environment Select Committee**

**11 June 2012**

**Cabinet**

**19 June 2012**

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**Subject: Submission of Wiltshire Core Strategy and Review of Local Development Scheme**

**Cabinet Member: Councillor Fleur de Rhé Philipe  
Economic Development and Strategic Planning**

**Key Decision: Yes**

## **Executive Summary**

The Wiltshire Core Strategy has been in development since early 2009, taking forward the work started by the former district councils. The Council has completed the final statutory consultation period for representations, inviting comments on the soundness of the document. Representations were received from more than 430 different organisations and individuals, collectively resulting in over 1,700 comments on different parts of the plan. The consultation has raised no issues which officers consider merit delay in progressing to Submission.

Following the consultation, a number of changes are proposed to the Wiltshire Core Strategy Pre-Submission Document (draft Core Strategy) in the interests of improving clarity and understanding of the document, and to update it to improve consistency with the National Planning Policy Framework. These proposed changes are considered to be minor in nature and do not alter the overall substance of the Core Strategy. Once approved they will be submitted to the Secretary of State alongside the draft Core Strategy.

Cabinet is asked to consider and recommend approval of the draft Core Strategy and schedule of proposed changes for Submission to the Secretary of State for Examination, which can take place following approval by Council on 26 June 2012. The Secretary of State will appoint an independent Inspector to examine the soundness of the plan. In examining the document, the Inspector will consider all representations received in this final stage of consultation and will set out his/her findings in a report to the Council.

In addition, Cabinet is asked to approve a revision to the Local Development Scheme to set out the timetable for reviewing the saved former district Local Plan policies not replaced by the Wiltshire Core Strategy and, where appropriate, develop additional locally distinctive policies to guide development within Wiltshire, consistent with national policy.

## **Proposals**

That Cabinet:

- (i) Notes the outcome of the consultation.
- (ii) Recommends to Council on 26 June 2012 that the Wiltshire Core Strategy Pre-Submission Document, together with proposed changes (set out in **Appendix 2**), should be submitted to the Secretary of State for Examination;
- (iii) Delegates to the Service Director, Economy and Regeneration, in consultation with the Cabinet Member for Economic Development and Strategic Planning authorisation: for the preparation of other minor modifications to the Core Strategy for Submission to the Secretary of State in the interests of clarity and accuracy; and to make appropriate arrangements for submission of documents to the Secretary of State and any consequential actions as directed by the Inspector relating to the Examination.
- (iv) Approves the revision to the Local Development Scheme.

## **Reason for Proposals**

To ensure that progress continues to be made on preparing an up-to-date development plan for Wiltshire, in line with the timetable set out in the Council's Local Development Scheme and statutory requirements, and to update the Local Development Scheme in the light of the need to ensure work continues on maintaining an up-to-date development plan for Wiltshire.

**Alistair Cunningham**  
**Director for Economy and Regeneration**

**Wiltshire Council**

**Environment Select Committee**

**11 June 2012**

**Cabinet**

**19 June 2012**

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**Subject: Submission of Wiltshire Core Strategy and Review of Local Development Scheme**

**Cabinet Member: Councillor Fleur de Rhé-Philipe  
Economic Development and Strategic Planning**

**Key Decision: Yes**

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**Purpose of Report**

1. To:
  - (i) Inform Cabinet of the outcome of the recent consultation.
  - (ii) Seek Cabinet's recommendation to Council that the Wiltshire Core Strategy Pre-Submission Document, together with proposed changes, should be submitted to the Secretary of State for Examination.
  - (iii) Seek Cabinet's approval for a revision to the Local Development Scheme.

**Background**

2. The Wiltshire Core Strategy, when adopted, will provide new up-to-date planning policy for Wiltshire to ensure that Wiltshire develops in the most sustainable way. Core Strategies set out the long-term vision for an area and provide policies and proposals to deliver the vision. Subsequent development plan documents will need to be in general conformity with the Core Strategy, as will neighbourhood plans.
3. Cabinet and Council on 17 January and 7 February 2012 respectively, approved the publication of the draft Wiltshire Core Strategy for a final stage of consultation. The background to the preparation of the document is contained within the Agenda papers to both meetings. Consultation on the document took place over a six week period commencing 20 February 2012 and ending on 2 April 2012. Towards the end of the consultation period the National Planning Policy Framework (NPPF) was published in its final form.

4. While the Cabinet resolution allowed for the Core Strategy to proceed straight to Council following completion of the consultation it is considered appropriate, given the publication of the NPPF, to bring the Core Strategy back to Cabinet, prior to Council. This will enable the implications of the NPPF to be considered.
5. Furthermore, Cabinet on 15 November 2011 approved a revised Local Development Scheme (LDS) to ensure that Wiltshire Council had an up-to-date timetable for the preparation of planning policy in Wiltshire. At the time, in the light of ongoing changes to the planning system by Government, it was recognised that the LDS would need to be reviewed in six to nine months time once the changes to the planning system had become clear and new priorities for the Council could be identified.

### **Main Considerations for the Council**

6. The Core Strategy sets out a spatial planning framework for the development of Wiltshire to 2026 with the overall objective of ensuring that the county contributes to achieving sustainable development. It does this by taking local circumstances into account and responding to Wiltshire's distinctiveness. It is considered to be a sound document that is based on robust and proportionate evidence and can be found accompanying the Agenda papers for the meeting on the website at:

<http://www.wiltshire.gov.uk/wiltshire-core-strategy-pre-submission-document-with-bookmarks-february-2012> (PDF - 10mb)

[http://consult.wiltshire.gov.uk/portal/spatial\\_planning/wcs/pre-subconsult2012?tab=files](http://consult.wiltshire.gov.uk/portal/spatial_planning/wcs/pre-subconsult2012?tab=files) (Online Consultation Portal)

Hard copies have been provided to Cabinet and Environment Select Committee Members and available to other Councillors on request. It has been prepared taking into consideration local views and aspirations, as well as national planning policy.

#### National Planning Policy Framework

7. The NPPF provides a framework within which local people and their accountable councils can produce their own distinctive local plans, which reflect the needs and priorities of their communities (Paragraph 1) and must be taken into account in the preparation of local plans (Paragraph 2). Policies in paragraphs 18 to 219 of the NPPF, when taken as a whole, constitute the Government's view of what sustainable development means (Paragraph 6) and reinforces the role plan-making has in the delivery of sustainable development:

*"Local Plans<sup>1</sup> are the key to delivering sustainable development that reflects the vision and aspirations of local communities."*

(Paragraph 150, NPPF)

8. While national planning policy has been recently updated both by the NPPF and separate planning policy for traveller sites, the core planning principles underlying the NPPF (paragraph 17) generally conform to previous policy.

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<sup>1</sup> Development Plan Documents (DPD) collectively form the 'Local Plan' for an area.  
CM09395/F



This is not unexpected given that the intention of Government was to rationalise and simplify policy and for sustainable development to still remain at the heart of the planning system. As reported previously, the draft Core Strategy was prepared in the light of existing, as well as emerging, national planning policy at that time, including the draft NPPF. Having studied the NPPF, officers consider that the draft Core Strategy is generally consistent with the NPPF, although some minor changes are proposed to further improve consistency. These are discussed below (see paragraph 12).

9. For the avoidance of doubt, officers have discussed with the Planning Inspectorate whether it is necessary to undertake consultation on the implications of the NPPF prior to the draft Core Strategy being submitted. The Inspectorate has confirmed that it is acceptable practice to proceed to Submission and undertake this as part of the Examination process.

#### Representations on Wiltshire Core Strategy Pre-Submission Document

10. The consultation resulted in representations from more than 430 different organisations and individuals. A petition was also received with over 90 signatures objecting to development in Chippenham. Collectively, more than 1,700 separate comments were made on different parts of the plan. These comments will be considered by the Government appointed Inspector and form the basis of the forthcoming Examination.
11. A summary of the main points raised through the recent consultation can be found within Chapter 4 of the consultation output report<sup>2</sup>, included at **Appendix 1** to this report. Copies of the full report with more detail on comments received and an overview of how the consultation was undertaken will be made available for viewing in the **Members' Room** for Cabinet and will accompany the agenda papers for the Cabinet meeting on the website. This report will be submitted to the Secretary of State, alongside other submission documents, together with copies of all representations received during the consultation. The issues raised will inform matters for consideration and discussion at the Examination.
12. In response to the consultation, a number of changes are proposed to the draft Core Strategy in the interests of improving clarity and understanding of the document and to update it to improve consistency with the NPPF. In addition, a small number of changes are proposed by officers for similar reasons. These are considered to be minor in nature and not alter the overall substance of the Core Strategy, the validity of the Sustainability Appraisal or negatively affect the consistency with national policy. They can be included in the draft Core Strategy in order to strengthen the document without undermining its overall soundness. At this stage in the process, any changes should be submitted to the Secretary of State as a schedule of proposed changes to the document. These are set out in full in the schedule at **Appendix 2** to this report.

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<sup>2</sup> The Regulation 30(1)(d)(e) Statement (Town and Country Planning (Development)(England) Regulations 2004 (as amended)/Regulation 22(1)(c) Statement (The Town and Country Planning (Local Planning) (England) Regulations 2012)  
CM09395/F

13. The majority of representations received did not lead to any changes being proposed to the draft Core Strategy. An overview of some of the key concerns/issues raised is provided in **Appendix 3** to this report, together with a brief explanation as to why changes to the draft Core Strategy are not considered justified.
14. Specific representations were also received on the draft Sustainability Appraisal (SA) (see paragraph 19 below). The main areas of concern related to the consideration of higher and lower housing and employment figures, questions by a number of developers regarding the removal of strategic sites from the plan in some market towns, concerns over definition of sustainable development and suggestion that it would be reasonable to consider an alternative spatial strategy (one based on prioritising high density mixed use town centre development, brownfield focus, avoidance of major road capacity increase and prioritisation of social and environmentally beneficial infrastructure).
15. While Officers consider that the work undertaken so far is appropriate, more information will be added to the SA relating to these issues in the interests of clarity. SA is an iterative process and should take into account comments received during consultation stages. It is being updated in the light of these responses and will be completed for Submission. Officers consider that this further work should not lead to any change to the draft Core Strategy as a result.

#### Next Steps

16. Following Submission, the Secretary of State will appoint an independent Inspector to conduct an Examination into the soundness of the Core Strategy. Officers will be fully involved in the Examination and represent the Council on those matters that the Inspector wishes to examine in more detail. At the end of the process the Inspector will, on behalf of the Secretary of State, issue the Council with a report on his/her findings.

#### Review of Local Development Scheme

17. The Wiltshire Local Development Scheme (LDS), approved November 2011, envisaged there would be the need to review the three year project plan once the NPPF had been published in its final form and purposefully left scope to do this. Arising from the study of the NPPF it is proposed that the Council review the current LDS to introduce a programme for a partial review of the Wiltshire Core Strategy. The purpose of the review would be to:
  - (i) Review and update the saved 2011 Local Plan development management policies not replaced by the draft Wiltshire Core Strategy (Appendix D) consistent with the NPPF; and
  - (ii) Develop additional locally distinctive policies to guide development within Wiltshire consistent with national policy, in particular the requirement within the NPPF to plan positively for all town centres within Wiltshire.

While the original proposal in the approved LDS was to have a separate Development Management Development Plan Document (DPD), Government is now encouraging fewer separate planning policy documents; as such an early review of the Core Strategy is considered appropriate to add new policies. The outcome of the review would essentially be an addendum to the Core Strategy and would not re-open discussion about other parts of the plan.

18. The LDS will continue to include an ongoing commitment to be responsive to the need for the Council to bring forward additional housing allocations, at Market Towns (where strategic site allocations have not been identified in the draft Core Strategy) and at Local Service Centres, where they are not being delivered through Neighbourhood Planning. This will only be triggered where there is evidence through the Annual Monitoring Report that there could be issues in maintaining a five year land supply for housing and the Council, as local planning authority, needs to step in and produce a Site Allocations DPD.

### **Environmental and Climate Change Considerations**

19. Spatial Planning has implications for the physical, economic and social environment. A SA incorporating Strategic Environmental Assessment has been undertaken during the preparation of the Core Strategy. The SA has been undertaken iteratively at all stages of preparation and has informed the evolution of the Core Strategy. A Habitat Regulations Assessment (HRA) has also been undertaken. Both have helped shape the strategy and will ensure that negative environmental impacts are avoided and sustainable development can be delivered.
20. Climate change is one of the cross cutting objectives of the draft Wiltshire Core Strategy. In particular, it seeks to deliver the most sustainable pattern of growth to promote self containment as far as possible and minimise the need to travel, particularly by the private car. The document includes specific policies to encourage the delivery of renewable energy sources and design measures to promote sustainable construction and low carbon buildings. A Strategic Flood Risk Assessment has also been undertaken as part of the process to ensure that future development is not vulnerable to flooding or increases the risk of flood elsewhere.

### **Equalities Impact of the Proposal**

21. The Wiltshire Core Strategy aims to positively manage growth and development in Wiltshire. The consultation processes and community involvement has ensured that everyone has had the opportunity to inform the preparation of the Core Strategy. When the Draft Wiltshire Core Strategy is submitted to the Secretary of State for Examination, Regulations require that it is accompanied by an Equalities Impact Assessment and an accompanying minute that Council has exercised its duty in relation to the Equalities legislation.

### **Risk Assessment and Options Considered**

22. Until the formal abolition of the adopted and draft Regional Spatial Strategies for the South West (RSS) the draft Core Strategy needs to be in general conformity with it unless new up-to-date evidence indicates otherwise. The

document is considered to meet this requirement, albeit that only very limited (if any) weight can be given to the RSS given that its formal revocation could be imminent.

23. It is important that Wiltshire has in place up-to-date planning policy as soon as possible and progress continues to be made towards adoption of the Wiltshire Core Strategy. Without the Core Strategy, the formal abolition of the RSS and Structure Plan (also part of the Localism Act 2012) will mean a policy vacuum for Wiltshire as a whole with a reliance on former district local plans that were only intended to be in place to 2011. The explicit introduction of 'the presumption in favour of sustainable development' into national policy the NPPF reinforces the need for local planning authorities to have up-to-date plans in place. Where the development plan is absent, silent or relevant policies are out of date planning permission should be granted unless "*any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the framework taken as a whole*" (Paragraph 14).
24. The risk of not progressing the Core Strategy could result in speculative proposals that Wiltshire Council would not be well placed to defend or develop in a way that maximises benefits for local communities, providing no certainty for developers or local communities. The importance of delivering new homes and demonstrating a five-year supply of deliverable sites is emphasised in the NPPF and remains a key part of Government policy. Wiltshire's five-year supply is dependent on the progression of the Core Strategy and timely approval of strategic site allocations within it.
25. The principal risk associated with the submission and examination stage relates to soundness. The Council, in submitting the plan for examination, considers it to be sound, namely that it has been positively prepared, is justified, effective and consistent with national planning policy (paragraph 182, NPPF). This will be tested by the Inspector through the Examination process.

### **Financial Implications**

26. The cost of preparing the Wiltshire Core Strategy has been planned financially and the Examination costs can be met within budget. There is potential for further financial costs at the end of the Examination process. If it is found to be sound and subsequently adopted by the Council, there follows a six week period of legal challenge. Such actions are rare but must be considered and costs will need to be met.
27. Early adoption of the Wiltshire Core Strategy will provide the planning policy framework to facilitate the delivery of new housing and ensure that Wiltshire will not be disadvantaged in relation to the New Homes Bonus. The ability of the Council to become a Charging Authority for Community Infrastructure Levy and secure this form of funding into the area is dependent upon a sound Core Strategy being in place.

## **Legal Implications**

28. In accordance with the Planning and Compulsory Purchase Act 2004, the Council has a statutory duty to prepare planning policy, which has been reinforced through the NPPF and Localism Act 2011.
29. Following Royal Assent of the Localism Act on 15 November 2011, certain provisions came into force with immediate effect. A key change in place for the purpose of plan examinations is that Section 110(3) amends Section 20(5) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) by requiring the Inspector to consider (alongside legal compliance and soundness) 'whether the local authority complied with any duty imposed on the Authority by Section 33A in relation to its [the plan's] preparation'. Section 33A being the new duty to co-operate inserted into the PCPA 2004 by Section 110(1). In preparing the Wiltshire Core Strategy, proper and meaningful consultation has been undertaken with neighbouring authorities and other prescribed bodies to understand the implications of the proposed policies on the interests of these organisations.
30. In examining the draft Core Strategy, the Inspector will assess whether the plan has been prepared in accordance with the Duty to Co-operate, legal and procedural requirements, and whether it is sound (Paragraph 182, NPPF). The steps taken to prepare the draft Core Strategy are considered to be compliant with legislative requirements.

## **Conclusions**

31. The Wiltshire Core Strategy has been in development since early 2009, taking forward the work started by the former district councils. The Council has completed the final statutory consultation period for representations, inviting comments on the soundness of the document. The consultation has raised no issues which merit delay in progressing to Submission.
32. The draft Core Strategy and schedule of proposed changes should be submitted to the Secretary of State for Examination following approval by Council on 26 June 2012 to ensure that progress continues to be made in preparing an up-to-date development plan for Wiltshire.
33. It is also necessary to update the Local Development Scheme in the light of the need to ensure work continues on maintaining an up-to-date development plan for Wiltshire.

## **Alistair Cunningham** **Director for Economy and Regeneration**

Report Authors:

**Georgina Clampitt-Dix**  
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**David Milton**  
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**The following unpublished documents have been relied on in the preparation of this Report:**

Consultation Output Report to be published prior to Cabinet <sup>3</sup>

**Appendices:**

All appendices are in draft form and will be updated in the interests of clarity and accuracy for Cabinet.

Appendix 1 - Draft Extract from Consultation Output Report (Agenda page 19)

Appendix 2 - Draft Schedule of Proposed Changes to the Wiltshire Core Strategy Pre-Submission Document (Agenda page 63)

Appendix 3 - Draft Summary of Key Issues (Agenda page 101)

Appendix relating to review of Local Development Scheme to be included as part of the Cabinet paper

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<sup>3</sup> The Regulation 30(1)(d)(e) Statement (Town and Country Planning (Development)(England) Regulations 2004 (as amended)/Regulation 22(1)(c) Statement (The Town and Country Planning (Local Planning) (England) Regulations 2012)  
CM09395/F

## **Appendix 1 - Extract from Consultation Output Report**

### **1. Wiltshire core strategy pre-submission document overview of consultation**

#### **Context**

- 1.1 This draft report sets out an overview of the comments received in response to the consultation on the Wiltshire core strategy pre-submission document and provides a brief summary of the key issues raised in relation to each part of the plan. The report is currently in draft form, and will form part of a wider consultation report. There will be some changes to the figures and charts prior to finalisation of the report and the summary of key issues may also be updated to achieve a greater degree of consistency in relation to the level of detail provided for each part of the plan.
- 1.2 The completed wider consultation statement will constitute the consultation statement required by Section 22 (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 and will include further information on who was consulted and how that consultation was carried out. It will refer back to reports on previous consultations in 2011 (Wiltshire Core Strategy Consultation Document) and 2009 (Wiltshire 2026) to identify how the plan has been amended in response to the comments made at those stages as well as document changes proposed to the pre-submission draft in response to comments received on the Wiltshire Core Strategy Pre-submission Document.
- 1.3 The Wiltshire Core Strategy Pre-submission Document has incorporated the adopted South Wiltshire Core Strategy. How consultation informed the preparation of that plan is documented at <http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/southwiltshirecorestrategy.htm> .

#### **Overview of comments received**

**Table 1: Summary of community engagement, Wiltshire core strategy pre-submission document**

Number of organisations and individuals consulted (by e-mail/letter)	13,728 <sup>1</sup>
Number of organisations and individuals who responded	437 <sup>2</sup>
Number of comments received	1787 <sup>3</sup>
Number of workshops	4
Number of participants at workshops	129

#### **Nature of respondents**

<sup>1</sup> This figure may include an element of duplication as some consultees may have received two letters/emails.

<sup>2</sup> These figures will be updated prior to finalisation of the report to take account of a few additional comments which have been inputted since these figures were generated.

<sup>3</sup> See footnote 2 above.

1.4 In all the council received letters of comment from over 430 different organisations and individuals which resulted in over 1780 separate comments. A petition was received with 94 signatures objecting to development around Rowden and Patterdown in Chippenham and this has been counted as a single consultation response for the purposes of this report. Figure 1 below shows the breakdown of respondents by type. This shows that the largest group of respondents was members of the general public, followed by landowners/developers and then parish and town councils and neighbouring authorities.

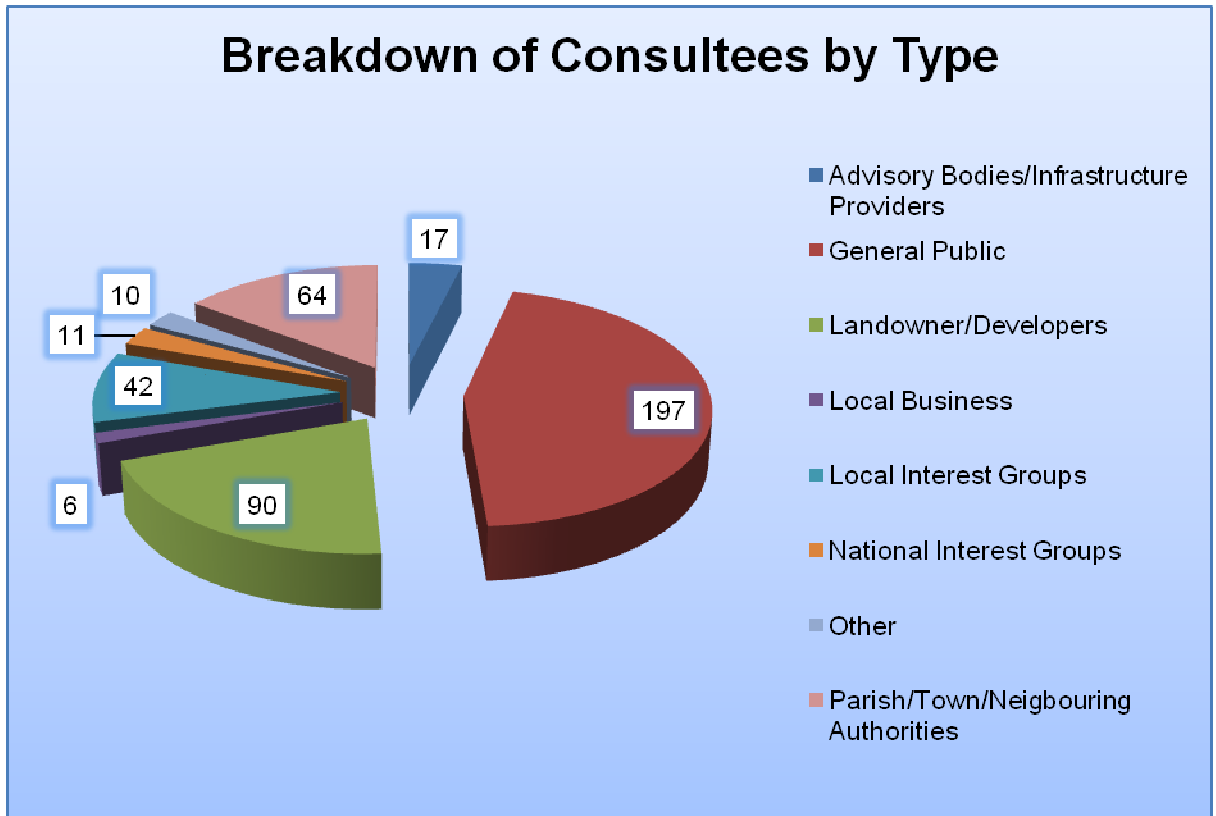
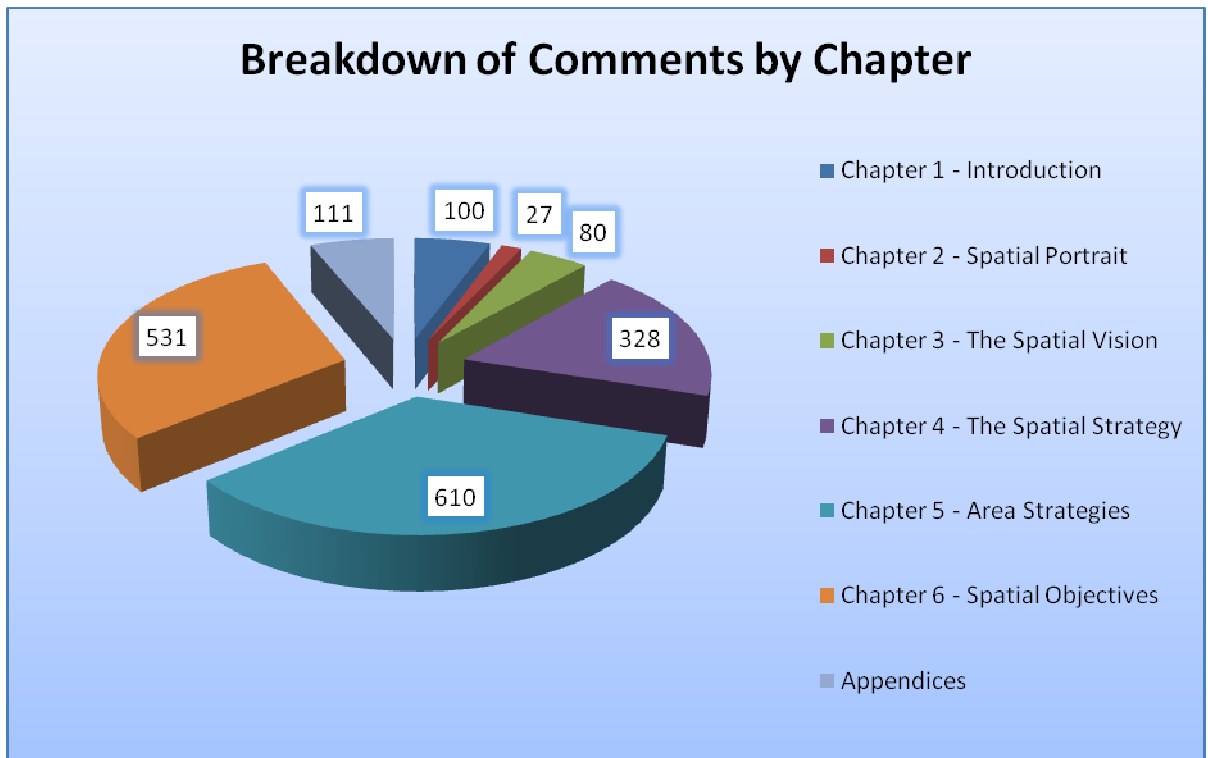


Figure 1: Breakdown of consultees by type

### Nature of responses

1.5 Figure 2 below shows the breakdown of comments received in relation to each chapter of the core strategy pre-submission document.





**Figure 2: Breakdown of comments by chapter**

- 1.6 The breakdown of the type of respondents varied for each chapter, with the area strategies in chapter 5 generating a larger number of comments from the general public than the other areas of the strategy. The breakdown of the comments received from each type of consultee in relation to each chapter is presented in figure 3 below. Figures 4-6 provide a more detailed breakdown for chapters 4, 5 and 6.
- 1.7 Please note that some consultees have been included within more than one categorisation which means that some comments will be 'double counted' in the following graphs. This will affect the total number of comments shown in each graph.

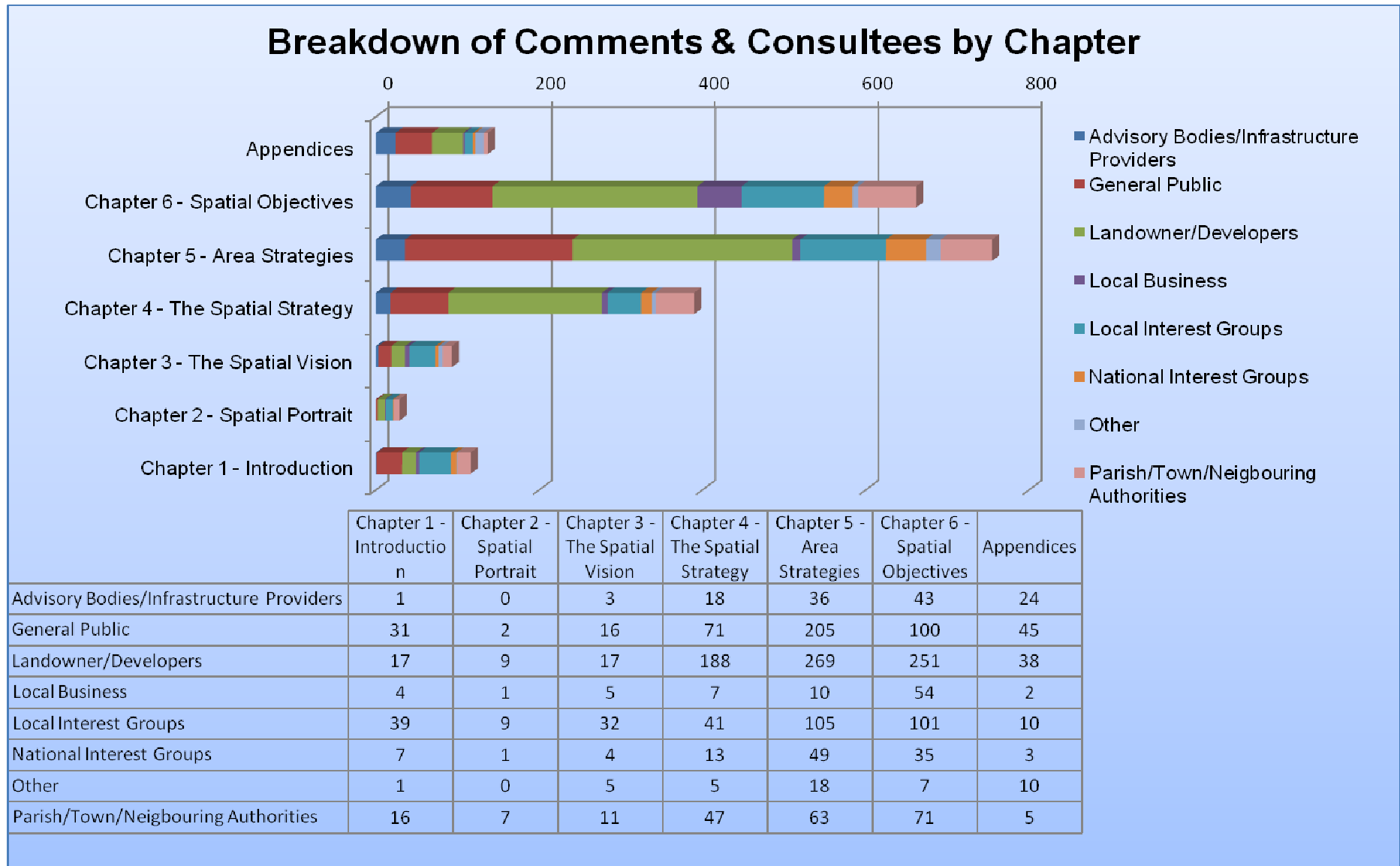


Figure 3: Breakdown of comments and consultees by chapter

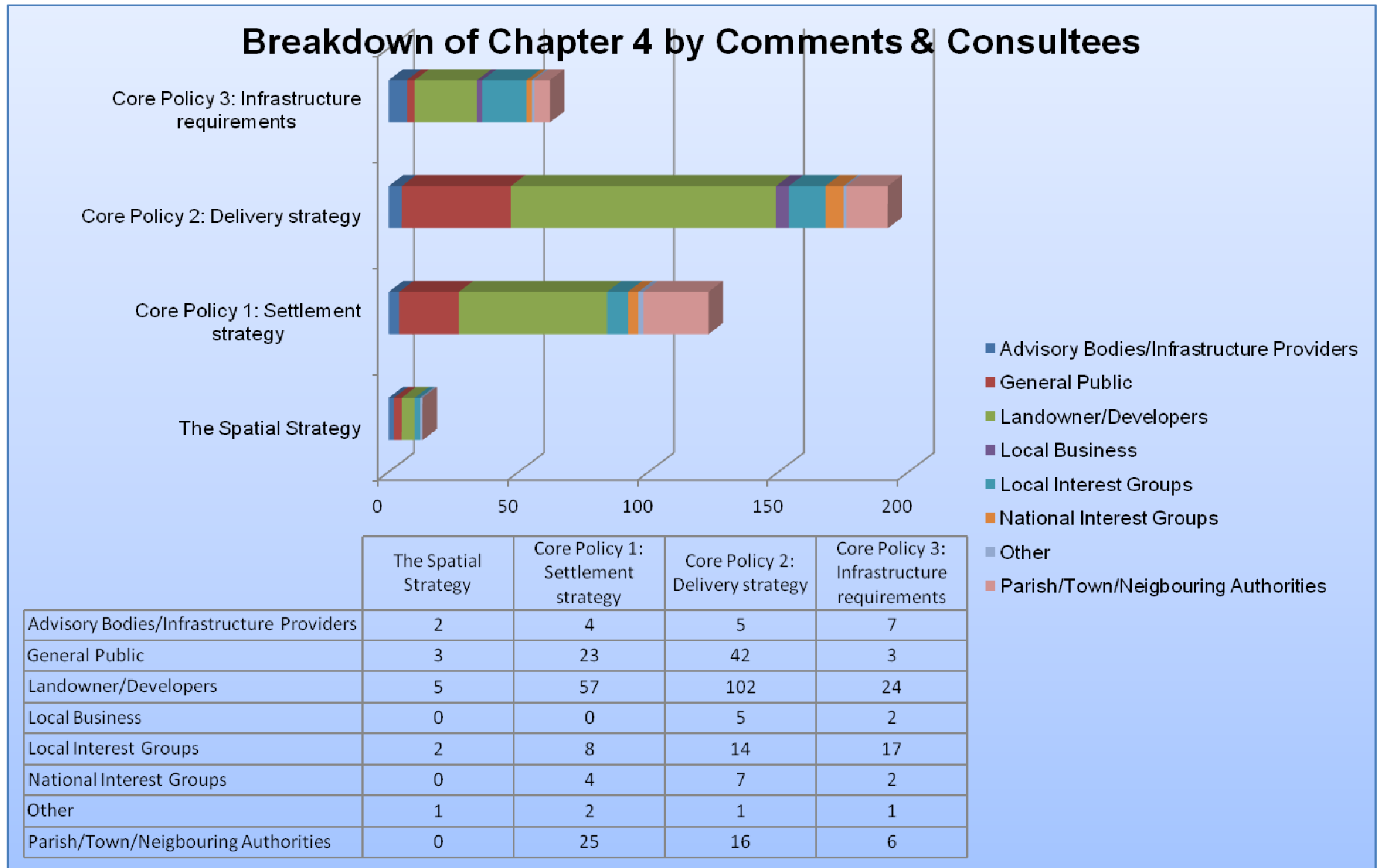


Figure 4: Breakdown of comments and consultees for chapter 4

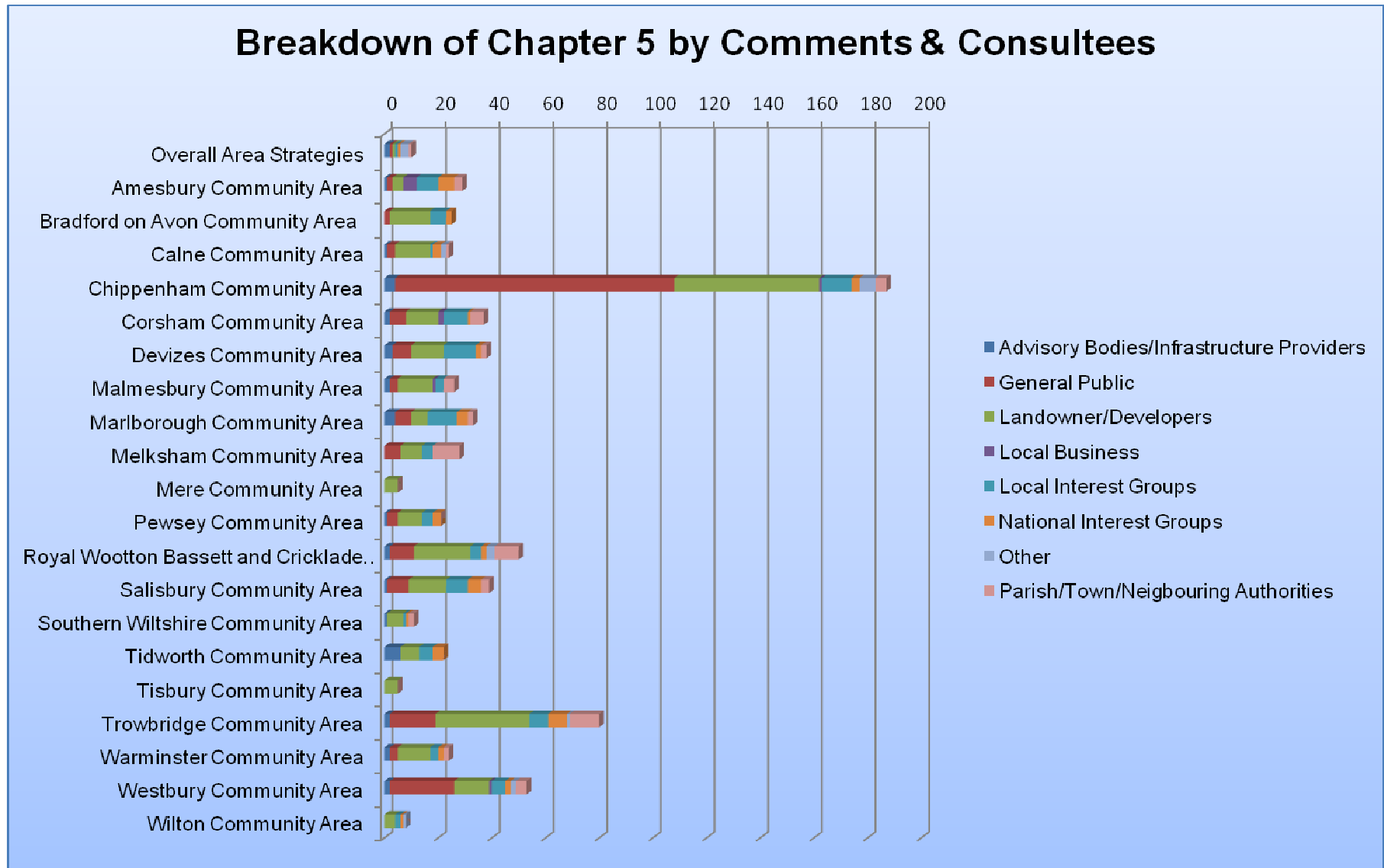
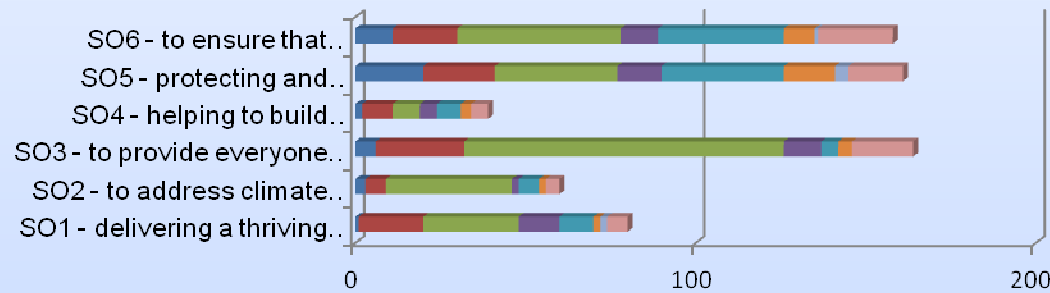


Figure 5: Breakdown of comments and consultees for chapter 5

## Breakdown of Chapter 6 by Comments & Consultees



	SO1 - delivering a thriving economy	SO2 - to address climate change	SO3 - to provide everyone with access to a decent affordable home	SO4 - helping to build resilient communities	SO5 - protecting and enhancing the natural environment	SO6 - to ensure that essential infrastructure is in place support our communities
Advisory Bodies/Infrastructure Providers	1	3	6	2	20	11
General Public	19	6	26	9	21	19
Landowner/Developers	28	37	94	8	36	48
Local Business	12	2	11	5	13	11
Local Interest Groups	10	6	5	7	36	37
National Interest Groups	2	2	4	3	15	9
Other	2	0	0	0	4	1
Parish/Town/Neighbouring Authorities	6	4	18	5	16	22

- Advisory Bodies/Infrastructure Providers
- General Public
- Landowner/Developers
- Local Business
- Local Interest Groups
- National Interest Groups
- Other
- Parish/Town/Neighbouring Authorities

Figure 6: Breakdown of comments and consultees for chapter 6

## Key issues

- 1.8 The key issues raised during the consultation are summarised in Table 2 below. The list is not exclusive and summaries of all the comments received will be provided in an appendix to the wider consultation report. In addition, all comments will be available to view on the online consultation portal<sup>4</sup>.

**Table 2: Summary of key issues in relation to each part of the core strategy**

Chapter/policy	Key issues raised
1: Introduction	<ul style="list-style-type: none"> <li>• Concerns about the consultation process:                             <ul style="list-style-type: none"> <li>○ More weight should be given to comments made.</li> <li>○ Responses published on the web site are often too simplistic or miss the point.</li> <li>○ Advice on how to comment misleading and non compliant with SCI</li> <li>○ Overly complex and uses too much jargon</li> <li>○ Objective (online system) not easy to use and expects comments to be submitted on single issues.</li> <li>○ Availability of documents at library and complexity of evidence.</li> <li>○ Complexity of consultation process.</li> </ul> </li> <li>• Opinion divided as to whether Core Strategy is consistent with the National Planning Policy Framework (NPPF). Suggestion that council should reconsult to take account of the NPPF.</li> <li>• Need map to show town and parish boundaries and other designations.</li> <li>• Definition of sustainable development needed.</li> <li>• Cannot force a more sustainable society on people by simply providing jobs and homes in the same location.</li> <li>• Seek a referendum at Chippenham to properly reflect resident's wishes.</li> <li>• Document in relation to Trowbridge doesn't properly reflect public opinion.</li> <li>• If development at West Ashton goes ahead, S106/CIL from the site should be used for town centre regeneration.</li> <li>• Strategy focuses on road corridors rather than urban regeneration.</li> <li>• Targets for additional housing should be based on statistics and trends and use a bottom up approach to assessment of local needs.</li> <li>• How the SWCS has been merged into the WCS.</li> <li>• Support for approach to landscape scale conservation.</li> <li>• Diminishing water resources have not been taken into account.</li> <li>• Role of other SPD, DPD, VDS and Village Plans.</li> <li>• No recognition of the needs of faith groups.</li> <li>• Need to additional evidence in relation to tourism, traffic</li> </ul>

<sup>4</sup> The online consultation portal can be accessed at:  
[http://consult.wiltshire.gov.uk/portal/spatial\\_planning/wcs/pre-subconsult2012?tab=list](http://consult.wiltshire.gov.uk/portal/spatial_planning/wcs/pre-subconsult2012?tab=list)

	<ul style="list-style-type: none"> <li>congestion and air quality.</li> <li>• Overly ambitious.</li> </ul>
2: Spatial Portrait	<ul style="list-style-type: none"> <li>• Trying to reduce out commuting is the wrong strategy</li> <li>• Superfast broadband is essential Wiltshire-wide</li> <li>• Plan fails to adequately address water resources</li> <li>• Additional 3000 houses should be reserved West of Swindon</li> </ul>
3. Spatial Vision	<ul style="list-style-type: none"> <li>• Widespread support</li> <li>• The ambition and effectiveness of the climate change objectives were questioned</li> <li>• There was strong representation that meeting places and places of worship should be referenced</li> <li>• A number of requests to tighten up the key outcomes related to safeguarding landscapes especially the AONB and WHS.</li> <li>• Housing numbers are too low to meet the objectives</li> <li>• Housing numbers are too high to meet the objectives</li> <li>• Strategic objective 1:                         <ul style="list-style-type: none"> <li>○ Need higher education provision (including 16+) to match target sectors</li> <li>○ Support SO1 but concerned that approach is not carried through the strategy</li> <li>○ Location of Chippenham strategic sites does not agree with SO1</li> <li>○ Not practical to suggest retail development will only come forward in town centres. Inconsistent with NPPF.</li> <li>○ Support for SO1 and particularly key outcome in relation to the tourism industry.</li> <li>○ Welcome for key outcome relating to redundant MOD land.</li> <li>○ Concern at removal of policy on rural diversification and enterprise which was included in earlier consultation document.</li> <li>○ Should recognise Swindon as important regional centre.</li> <li>○ Approach to prevent out commuting could have detrimental effect on economic growth.</li> <li>○ New retail provision should provide more effective choice and competition.</li> <li>○ The jobs/employment land forecasts are neither sound or evidence-based: further work is required.</li> <li>○ Lack of clarity over how the figure of 27,500 jobs and 178 ha employment land is arrived at.</li> </ul> </li> </ul>
4. Spatial Strategy: Core Policy 1 – Settlement Strategy	<ul style="list-style-type: none"> <li>• Widespread support, but with minor changes proposed</li> <li>• CP1 is inflexible and will constrain and stifle development, and is therefore contrary to NPPF</li> <li>• Needs radical rethink of spatial strategy to be compliant with European Law</li> <li>• No reference to Conservation Areas</li> <li>• Approach to small villages is too restrictive and simplistic and is not specific enough about when development is acceptable</li> </ul>

	<ul style="list-style-type: none"> <li>• Concern about how policy could be interpreted around settlement boundaries</li> <li>• Village policy limits should be retained for small villages</li> <li>• Settlement boundaries are out of date and should be expanded/reviewed</li> <li>• Strong support for Trowbridge and Salisbury being identified as Principal Settlements; some support for Chippenham, but also a number of objections.</li> <li>• Number of suggestions for changes to designations of the other settlements</li> <li>• CP1 does not recognise cross border relationships; should include a 'West of Swindon' category.</li> </ul>
<p>4. Spatial Strategy: Core Policy 2 – Delivery Strategy</p>	<ul style="list-style-type: none"> <li>• Plan period should be extended to cover 15 years; housing and employment requirements should be increased accordingly.</li> <li>• Housing requirement should be increased:             <ul style="list-style-type: none"> <li>○ Not sufficiently flexible</li> <li>○ Does not plan for specific uncertainties (capacity of J16, closure of RAF Lyneham)</li> <li>○ Contrary to the NPPF</li> <li>○ Projections used do not accord to high economic growth scenario</li> <li>○ Should accord with latest CLG household projections</li> <li>○ Will worsen affordability of homes</li> <li>○ Does not accord with SHMA</li> <li>○ Does not accord with SA</li> <li>○ Will not meet sub-regional requirement, as neighbouring authorities have also reduced housing requirements</li> <li>○ Overly restrictive and does not encompass the presumption in favour of sustainable development</li> <li>○ Should reflect RSS</li> <li>○ Methodology is not transparent</li> <li>○ Assumes a change in people's behaviour</li> <li>○ Does not reflect SHLAA.</li> </ul> </li> <li>• Housing requirement should be decreased:             <ul style="list-style-type: none"> <li>○ Infrastructure already over-burdened</li> <li>○ No justification</li> <li>○ Has been maintained from RSS and is based on out-of-date models</li> <li>○ Population growth should be managed by Government</li> <li>○ Based on shaky demographic and migration assumptions</li> <li>○ Insufficient water resources.</li> </ul> </li> <li>• General support for the housing requirement from 5 respondents</li> <li>• Concerns about the distribution of housing:             <ul style="list-style-type: none"> <li>○ Housing Market Areas are arbitrary</li> <li>○ Community Area and settlement housing targets are too prescriptive</li> <li>○ Former district boundaries should be used</li> <li>○ Reduction from RSS targets has not been applied</li> </ul> </li> </ul>



	<p>consistently across Wiltshire</p> <ul style="list-style-type: none"> <li>• Should be mechanism to ensure housing and jobs are delivered in parallel</li> <li>• Wording in paragraph 4.23 should be changed to make it clear that while the Council wants to bring forward employment, the Core Strategy does not include a policy which links delivery of housing with employment.</li> <li>• Employment requirement:             <ul style="list-style-type: none"> <li>○ This should be a minimum</li> <li>○ Employment land should be of the right type and in the right location</li> <li>○ Sites outside the main settlements should be supported</li> <li>○ Need to ensure that population have sufficient skills to support new employment delivery</li> <li>○ Should prioritise release of strategic employment land</li> </ul> </li> <li>• Brownfield development:             <ul style="list-style-type: none"> <li>○ Mix of views as to whether brownfield sites should be prioritised.</li> <li>○ Brownfield development outside settlement frameworks should be permissible if more sustainable.</li> <li>○ Brownfield target should be increased.</li> <li>○ No need for Brownfield target.</li> <li>○ Should be mechanism to ensure Brownfield target is achieved.</li> </ul> </li> <li>• Location of development:             <ul style="list-style-type: none"> <li>○ Community led plans should be able to identify development adjacent to small villages</li> <li>○ Parish Plans and Village Design Statements should be included as sources of supply</li> <li>○ Small, sustainable developments should be allowed outside limits of development</li> </ul> </li> <li>• Delivery of development:             <ul style="list-style-type: none"> <li>○ Further detail needed on how and when site allocations DPD will be prepared</li> <li>○ Additional sites should be included as strategic sites</li> <li>○ Community led plans should not be relied upon to deliver</li> </ul> </li> <li>• Duty to co-operate should be evidenced</li> <li>• Masterplans should provide sufficient flexibility</li> <li>• Should be a requirement for places of worship.</li> </ul>
<p>4. Spatial Strategy: Core Policy 3 – Infrastructure Requirements</p>	<ul style="list-style-type: none"> <li>• Viability assessment is only necessary for development proposals where there is a dispute over viability</li> <li>• Viability of the Core Strategy should be reviewed in line with the NPPF</li> <li>• Prioritisation:             <ul style="list-style-type: none"> <li>○ Meeting halls and places of worship should be included as ‘place-shaping’ infrastructure</li> <li>○ Suggestions to changes to lists of essential and place-shaping infrastructure</li> <li>○ Full definition of ‘essential’ and ‘place-shaping’</li> </ul> </li> </ul>

	<p>infrastructure should be provided</p> <ul style="list-style-type: none"> <li>○ Current methodology is too generally applied across Wiltshire</li> <li>● Developer contributions:             <ul style="list-style-type: none"> <li>○ Contributions should not be required prior to development, and should be provided in stages</li> <li>○ Should clarify that there is no 'claw-back' principle</li> <li>○ CP3 should recognise that some payments may not be capable of being made.</li> <li>○ Planning permission should be deferred rather than deferring contributions</li> </ul> </li> <li>● Community Infrastructure Levy:             <ul style="list-style-type: none"> <li>○ Community should decide how CIL is spent for substantial developments, and the council should liaise directly with town and parish councils over CIL</li> <li>○ Request for firmer indication of the CIL to be set, and IDP to be costed</li> <li>○ Guidance note on planning obligations and CIL should be in place as part of Core Strategy</li> <li>○ CIL should be used for site-specific infrastructure or within the local area</li> </ul> </li> <li>● Planning obligations should be subject to tests set out in the CIL Regulations 2010</li> <li>● Should clarify position in relation to planning obligations post-2014</li> <li>● Omissions:             <ul style="list-style-type: none"> <li>○ State what priority will be given to affordable housing</li> <li>○ More detail on emergency fire and rescue service</li> <li>○ Should refer to water and sewerage infrastructure</li> <li>○ Should mention off-setting and biodiversity/eco system loss compensation mechanisms</li> <li>○ Need definition of sustainable transport</li> </ul> </li> <li>● Need clearer delivery strategy</li> <li>● South Wiltshire Core Strategy should be re-examined in terms of making best use of existing infrastructure</li> <li>● Should make better use of existing infrastructure</li> <li>● Review strategic allocations in light of provision of on- and off-site contributions to sport facilities.</li> </ul> <p>In addition to the above, a number of comments were received in relation to the Infrastructure Delivery Plan. The key issues arising from these comments are summarised below at the end of this table.</p>
<p>5. Area Strategies (introductory text)</p>	<ul style="list-style-type: none"> <li>● Overall level of growth:             <ul style="list-style-type: none"> <li>○ Housing and employment land quanta are too high and not supported by robust and credible evidence base. Growth projections should be revised downwards.</li> <li>○ Contingency sites should be added to the plan to address potential underperformance in delivery of housing during the early plan period.</li> </ul> </li> <li>● The Plan must take a consistent and coherent approach to</li> </ul>

	<p>the management of development and protection of historic assets. Relationship between CP58 and the approach taken in the Area Strategies needs to be consistently applied.</p> <ul style="list-style-type: none"> <li>• Impact on designated landscapes:             <ul style="list-style-type: none"> <li>○ Proposals will lead to unacceptable impacts on the North Wessex Downs AONB.</li> <li>○ To offset and/or address impacts on the AONB, Community Infrastructure Levy money should be directed towards ensuring the objectives of the relevant AONB Management Plan are delivered.</li> </ul> </li> <li>• Suggestions made in relation to more than one community area included:             <ul style="list-style-type: none"> <li>○ The plan period should be extended to 2028</li> <li>○ The statement about the master planning process should be clarified</li> <li>○ The text should be amended to clarify that housing and employment figures are minimum targets</li> <li>○ The final paragraph of CP7 should be deleted: it would be better suited to supporting text.</li> </ul> </li> </ul>
<p>Amesbury Area Strategy</p>	<ul style="list-style-type: none"> <li>• Need clarification as to which of the three 'Gomeldons' settlements are identified as a small village.</li> <li>• Concern that evidence base supporting changes to Amesbury is limited through reliance on previous planning effort focused on Salisbury.</li> <li>• Housing sought in Kings Gate area may require balancing growth in retail, road, education and leisure facilities.</li> <li>• Principal Employment Areas should be shown on the proposals map.</li> <li>• Previous local plan employment allocation at Solstice Park should be saved.</li> <li>• Bullet points in relation to Salisbury Plain Special Protection Area and the River Avon Special Area of Conservation are not in line with the Habitats Directive. Suggested changes to the text.</li> <li>• Reference to Stonehenge in paragraph 5.15 is both misleading and incorrect. Suggested changes to text.</li> <li>• Bullet points 5, 11 and 14 of para. 5.19 do not underline the Council's intention in respect of the WHS. Suggested changes to text.</li> <li>• Wording of para. 5.28 should be amended for accuracy and clarity of understanding in relation to the primary aim of the WHS Management Plan.</li> </ul>
<p>Bradford on Avon Area Strategy</p>	<ul style="list-style-type: none"> <li>• Should recognise importance of AONB</li> <li>• Should recognise distinctive neighbourhoods</li> <li>• Development should be phased to the end of the plan period</li> <li>• Level of growth proposed is the most that Bradford can withstand</li> <li>• Housing and employment allocations at Bradford on Avon should be increased</li> <li>• Should identify another site in BoA to deliver the residual housing requirement</li> </ul>

	<ul style="list-style-type: none"> <li>• Cycle path between BoA and Holt should be provided</li> <li>• Kingston Farm:       <ul style="list-style-type: none"> <li>○ Employment element is exaggerated</li> <li>○ Benefits of existing large trees should be recognised</li> <li>○ Will lead to urbanisation of Holt side of BoA</li> <li>○ Development should have little parking provision</li> <li>○ 2-3ha employment land not likely to be delivered: 5,000 sq m will be delivered</li> <li>○ Green space shown adjacent to the site is not available and will remain in agricultural use</li> <li>○ Statement about master planning process is unclear</li> <li>○ Not the most appropriate site when considered against alternatives</li> <li>○ Site does not have capacity to deliver the entire proposal</li> <li>○ Ecology, archaeology/cultural heritage, and landscape are constraints</li> <li>○ SA should be revisited</li> </ul> </li> <li>• Alternative sites:       <ul style="list-style-type: none"> <li>○ Land North of Holt Road</li> <li>○ Land at Bradford on Avon Golf Course</li> </ul> </li> <li>• Air quality, transport and Historic Core Zone:       <ul style="list-style-type: none"> <li>○ More serious consideration of AQMA needed</li> <li>○ Question as to how congestion will be reduced</li> <li>○ Question as to how Historic Core Zone will be delivered</li> <li>○ Concern at impact of Bath HGV ban</li> </ul> </li> <li>• Bath and Bradford on Avon SAC       <ul style="list-style-type: none"> <li>○ Policies for community area and environmental protection need to be rewritten in light of SAC</li> <li>○ Need Appropriate Assessment of Kingston Farm site</li> </ul> </li> <li>• Holt area of opportunity: an alternative area of opportunity should be identified.</li> </ul>
<p>Calne Area Strategy</p>	<ul style="list-style-type: none"> <li>• Calne Town Council support the strategy for the area</li> <li>• Housing requirement should be increased</li> <li>• Housing target should allow for additional development where there is a shortfall elsewhere</li> <li>• Settlement boundary of Calne should be redefined to include land at Castle Walk</li> <li>• Should identify site for care and older people's accommodation</li> <li>• Strategic allocation should be identified in Calne</li> <li>• Suggested allocations:       <ul style="list-style-type: none"> <li>○ Land to north east including land at High Penn</li> <li>○ Land off Oxford Road</li> </ul> </li> <li>• Support omission of land east of Chippenham as strategic site – should become rural buffer</li> <li>• Should recognise that development outside B1/B2/B8 can provide significant number of jobs</li> <li>• Qualitative need for convenience retail in Calne</li> <li>• Support for references to AONB</li> </ul>

	<ul style="list-style-type: none"> <li>• Aspirations to create entertainment and recreational facilities</li> <li>• Development should be high quality design</li> <li>• Support for not bringing forward eastern distributor road</li> </ul>
<p>Chippenham Area Strategy</p>	<ul style="list-style-type: none"> <li>• Housing requirement:           <ul style="list-style-type: none"> <li>○ Maximum housing requirement should be 1500</li> <li>○ Referendum should be taken on levels of development</li> <li>○ Should be made clear that there will be a need to release Greenfield land to deliver houses outside Chippenham</li> <li>○ Insufficient housing requirement in Chippenham Community Area</li> </ul> </li> <li>• Spatial Strategy:           <ul style="list-style-type: none"> <li>○ Too much emphasis given to early employment delivery</li> <li>○ Should not require employment development in advance of residential.</li> <li>○ Spatial Strategy is not ambitious enough to attract inward investment and does not provide a flexible supply of strategic employment sites</li> <li>○ Should refer to potential impacts of development at Chippenham on Lacock</li> <li>○ Lack of consultation with Lacock Parish Council regarding proposals for Chippenham</li> <li>○ Grittleton should be identified as a small settlement</li> </ul> </li> <li>• Sites:           <ul style="list-style-type: none"> <li>○ Showell Farm Employment Site isn't viable</li> <li>○ East Chippenham Site should be allocated for 800 dwellings.</li> <li>○ Object to inclusion of 18ha employment land at Showell Farm and 800 dwellings at Patterdown/Rowden</li> <li>○ Alternative sites (e.g. J17) dismissed too easily</li> <li>○ Support for allocation of North Chippenham and Rawlings Green sites. Remaining 800 dwellings should be identified through NP/Chippenham masterplan.</li> <li>○ Object to allocation of North Chippenham and impact on Birds Marsh Wood</li> <li>○ Support for non-identification of East Chippenham site – should be designated as local Green Space</li> <li>○ Rawlings Green proposals not supported by local community</li> <li>○ Constraints to development of Rawlings Green currently unknown.</li> <li>○ Hunters Moon site should be reinstated as an allocation for employment and 650 houses.</li> <li>○ Saltersford Lane should be reinstated.</li> <li>○ Barrow Farm should be allocated for mixed use.</li> <li>○ Forest Farm should be allocated for 2.5ha employment land and 700 houses.</li> <li>○ Suitable alternatives for provision of employment sites have not been suitably considered.</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ Support South Chippenham allocation.</li> <li>○ CP10 does not comply with NPPF. Need more jobs around the town centre rather than near the A350.</li> <li>○ Changes should be made to indicative greenspace areas for Rawlings Green.</li> <li>○ Change land identified by Natural England as being more visually prominent to indicative greenspace at South West Strategic Site.</li> <li>○ Land at SW Abbeyfield School is non-strategic site and should not be allocated in Core Strategy.</li> <li>○ Development is allocated in Rowden Conservation Area, which is an open rural landscape.</li> <li>● Brownfield opportunities:             <ul style="list-style-type: none"> <li>○ Lack of consideration of brownfield opportunities, contrary to NPPF</li> <li>○ Langley Park is not being used to full potential</li> <li>○ SHLAA notes potential for 545 houses</li> </ul> </li> <li>● Proposed development is contrary to NPPF</li> <li>● Chippenham Central Area of Opportunity             <ul style="list-style-type: none"> <li>○ Support for inclusion of Langley Park/Hathaway Park in CP9</li> <li>○ Support for Chippenham Central Area Masterplan</li> <li>○ Wiltshire College Site should be identified as part of Central Area of Opportunity</li> <li>○ Support for inclusion of Bath Road Car Park/Bridge Centre site; request for council to consider other uses such as A3</li> </ul> </li> <li>● Transport Strategy             <ul style="list-style-type: none"> <li>○ Concern over lack of transport strategy to inform Core Strategy – more detailed transport strategy needed for Chippenham</li> </ul> </li> </ul>
<p>Corsham Area Strategy</p>	<ul style="list-style-type: none"> <li>● Chippenham South East Site is not properly referenced in the text: numbers and text for Cosham Community Area therefore misleading</li> <li>● Need to maintain open countryside between Corsham and Chippenham</li> <li>● Policy should provide greater scope for permitting development outside settlement boundaries</li> <li>● MoD land &amp; alternative sites:             <ul style="list-style-type: none"> <li>○ Sites should be identified for remaining 475 houses or 6 ha employment land</li> <li>○ Policy should provide greater control over redevelopment of existing employment sites, including MOD land</li> <li>○ Support for policies in relation to Copenacre. Town Council would support a larger footprint on Copenacre and Rudloe site.</li> <li>○ Question deletion of strategic site on land west of Corsham.</li> <li>○ No evidence of deliverability of future employment provision – risk existing employment sites are lost to housing</li> <li>○ Fails to identify sufficient specific employment sites</li> <li>○ Fails to deliver development on MoD land</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ 10 ha Sands Quarry site should be allocated for employment, green buffer and recreation</li> <li>○ Land to north and east of Leafield Industrial Estate should be allocated in the plan</li> <li>● Transport:             <ul style="list-style-type: none"> <li>○ Support re-opening station; should be top priority</li> <li>○ Support strategy to improve worker retention and emphasis on improved facilities and services</li> <li>○ Not correct that transport is generally poor: A4 should be recognised as positive feature</li> <li>○ Corsham Cycle network and greencorridor between Chippenham and Corsham not likely to be delivered</li> </ul> </li> <li>● Qualitative need for additional convenience retail floorspace in Corsham in line with NPPF</li> <li>● IDP does not provide breakdown of costs or who will pay, TP8 lacks coherence and has not been discussed with the community – will not provide basis to negotiate with developers</li> <li>● Support taking account of Bath and Bradford-on-Avon SAC.</li> </ul>
<p>Devizes Area Strategy</p>	<ul style="list-style-type: none"> <li>● Support for aspiration for railway station</li> <li>● Support for production of Devizes Town Transport Strategy</li> <li>● Support for retention of existing development boundaries</li> <li>● Housing:             <ul style="list-style-type: none"> <li>○ Housing target should be increased</li> <li>○ Increase housing requirement in Devizes rural area</li> <li>○ Allocate land at Coate Bridge for mixed use including 350 homes</li> <li>○ Allocate land at Lay Wood/Horton Road for 350 homes</li> <li>○ Lack of 5 year housing land supply in Eastern HMA</li> </ul> </li> <li>● Wider heritage assets in Devizes than the Wharf and Assize courts</li> <li>● Devizes Hospital should no longer be viewed as potential housing site</li> <li>● Status of Worton</li> <li>● Objection to Horton Road employment allocation</li> <li>● Prioritise addressing traffic congestion, reducing air pollution and need for improved health care</li> <li>● Description of Devizes is overly optimistic.</li> </ul>
<p>Malmesbury Area Strategy</p>	<ul style="list-style-type: none"> <li>● Definition of Malmesbury Community Area is required – currently separate boundaries for Malmesbury, Burton Hill and Cowbridge and Foxley Road</li> <li>● Housing:             <ul style="list-style-type: none"> <li>○ Housing numbers should not be set or delivered until school places addressed</li> <li>○ Housing targets should be increased to meet housing need and needs of employers</li> <li>○ Other centres have a lower percentage increase in housing</li> <li>○ No evidence to support increased amount of housing for Malmesbury</li> <li>○ No clear evidence as to how allocation of housing has been derived</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ Should make it clear that delivery outside the main town will involve release of Greenfield sites</li> <li>○ Comments on previous consultations have not been taken into account</li> <li>○ Land at Park Road should be allocated for development.</li> <li>● Employment and retail:             <ul style="list-style-type: none"> <li>○ Employment allocation at the Garden Centre should be removed</li> <li>○ CP13 should refer to need for a town centre study to determine appropriate scale of supermarket development.</li> <li>○ Malmesbury does not need another supermarket.</li> </ul> </li> <li>● Transport:             <ul style="list-style-type: none"> <li>○ Need to consider transport impacts and increased pressure on M4 J17</li> <li>○ No mention of how public transport might be improved</li> </ul> </li> <li>● Villages:             <ul style="list-style-type: none"> <li>○ Should allow small sites on the edge of Oaksey/large villages</li> <li>○ Support designation of Oaksey and Great Somerford as Large Villages</li> </ul> </li> </ul>
<p>Marlborough Area Strategy</p>	<ul style="list-style-type: none"> <li>● AONB:             <ul style="list-style-type: none"> <li>○ Should make clear that AONB is starting point of any strategy in the community area</li> <li>○ Concerns that AONB has not influenced level and location of proposed development</li> </ul> </li> <li>● River network:             <ul style="list-style-type: none"> <li>○ Importance of River Kennet should be stated</li> <li>○ 'Sustainability' should be defined in relation to River Kennet and Og Rivers</li> <li>○ Serious concerns over environmental capacity of Marlborough environment, particularly upper River Kennet</li> </ul> </li> <li>● Salisbury Road strategic site allocation:             <ul style="list-style-type: none"> <li>○ Support for allocation</li> <li>○ Development template overly prescriptive and premature</li> <li>○ Number of houses should be reduced and provision for a hotel included</li> <li>○ Objections to the allocation due to lack of hotel, affect on ground water supply, lack of school places, increased traffic and air pollution, and impact on Savernake Forest SSSI and ecology within site</li> </ul> </li> <li>● Air pollution problem should be recognised</li> <li>● Housing should be phased: infrastructure and employment should come forward before residential</li> <li>● Importance of tourism should be recognised</li> <li>● Term 'Outstanding Universal Value' is confusing</li> <li>● Development should be promoted in sustainable locations, with consideration to impacts upon M4</li> <li>● Should acknowledge presence of bats in disused rail</li> </ul>



<p>Melksham Area Strategy</p>	<p>tunnel.</p> <ul style="list-style-type: none"> <li>• Concern at scale of development: infrastructure will be overwhelmed</li> <li>• Appears to be preference for development on green field sites to the east of Melksham</li> <li>• Rural buffer between Melksham and Bowerhill should be protected/made available as Community Park</li> <li>• Potential impact of development on Lacock should be recognised</li> <li>• Should specify that non-strategic development will consist of 2-3 sites of no more than 30-35 housing units</li> <li>• Should recognise role of town and parish councils in delivering CP15</li> <li>• Should be no further large scale building in Bowerhill area.</li> <li>• Bowerhill Sports Field should be retained</li> <li>• CP15 does not cover economic and social needs of the villages: rural industry in the villages should be encouraged</li> <li>• Cycle linkages needed between town centre and surrounding villages</li> <li>• Support for protection of historic environment of the Spa: should be designated as a Conservation Area</li> <li>• Listed building in the villages should also be protected and enhanced</li> <li>• Wiltshire Council need to pro-actively secure a better rail service</li> <li>• Housing and employment development will not in itself improve the retail area</li> <li>• Core Strategy should protect riverside amenity from tree-felling</li> <li>• Settlement hierarchy and villages:             <ul style="list-style-type: none"> <li>○ Seend, Seend Cleeve, Inmarsh and Sells Green should be treated as one settlement.</li> <li>○ Bowerhill should be classified as a separate settlement (Large Village or Local Strategic Centre)</li> <li>○ Inaccuracies in settlement strategy assessment of Seend Cleeve</li> <li>○ Great Hinton should be identified as a Small Village</li> <li>○ Land north of Shaw and Whitley presents opportunity to deliver housing and community facilities</li> <li>○ Remainder sites for the villages should be agreed through Neighbourhood Plans, not just windfall sites</li> <li>○ Should allow for more retail in Bowerhill village</li> </ul> </li> <li>• Employment:             <ul style="list-style-type: none"> <li>○ Support for regeneration of Bowerhill Industrial Estate</li> <li>○ Disagreement with use of old running track land for waste transfer station</li> <li>○ A Business Development Brief should be prepared to determine type and extent of employment required</li> <li>○ Upside Park should be excluded from list of Principal Employment Areas</li> <li>○ Bowerhill employment area serves a wider area</li> </ul> </li> </ul>
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	<ul style="list-style-type: none"> <li>○ than Melksham town</li> <li>○ Need car/lorry park at Bowerhill IE</li> <li>○ Heritage centre could be provided on employment land at Bowerhill</li> <li>● Lack of strategic site:             <ul style="list-style-type: none"> <li>○ Concern that lack of strategic site will leave town vulnerable to developers</li> <li>○ Strong objection to lack of strategic site: uncertainty around NPs, NPPF supports preparation of single Local Plan, inconsistent approach to allocations, removal of allocation has not been subject to SA/SEA</li> <li>○ Land north of the A3102 should be allocated for 100 homes, and land south of the existing development east of Melksham for 200 homes (Melksham Town Council)</li> <li>○ Land east of Melksham should be allocated for 400-450 dwellings</li> </ul> </li> <li>● Joined up thinking is required between Melksham and Trowbridge community areas</li> <li>● Errors on Melksham map need to be rectified</li> <li>● Housing and employment numbers:             <ul style="list-style-type: none"> <li>○ Housing numbers for rural settlements are too low</li> <li>○ Housing numbers for whole community area should be increased</li> <li>○ Too many houses are allocated in the community area</li> <li>○ Housing numbers for Melksham town should be decreased, and numbers for villages increased</li> <li>○ Figures for Bowerhill should not be included with Melksham town</li> </ul> </li> <li>● Canal project offers opportunity to provide walking and cycling links to the villages</li> </ul>
Mere Area Strategy	<ul style="list-style-type: none"> <li>● General support for CP17</li> </ul>
Pewsey Area Strategy	<ul style="list-style-type: none"> <li>● AONB:             <ul style="list-style-type: none"> <li>○ No alternative approach has been suggested within the Core Strategy for land inside the AONB</li> <li>○ Questions as to how level of development will be achieved without harm to the AONB – justification for level of development needs to be explained</li> <li>○ Within AONB development should be prioritised on brownfield land first, within the settlement boundary</li> </ul> </li> <li>● Support for settlement strategy but housing allocation for community area is insufficient</li> <li>● Increased recreational pressure should be avoided where it may impact on European habitats and species</li> <li>● Housing:             <ul style="list-style-type: none"> <li>○ Housing numbers are too high</li> <li>○ CP18 should make it clear that delivery of housing will involve Greenfield sites</li> <li>○ Should provide guidance on level of growth expected in Pewsey</li> <li>○ Majority of dwellings in the community area should</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ be focussed on Pewsey</li> <li>○ Housing development in Pewsey should be phased for delivery throughout the plan period</li> <li>○ CP18 should allocate a strategic site at Pewsey</li> <li>○ Pewsey currently delivers insufficient housing</li> <li>● Support identification of Burbage as a Large Village</li> </ul>
<p>Royal Wootton Bassett and Cricklade Area Strategy</p>	<ul style="list-style-type: none"> <li>● West of Swindon:           <ul style="list-style-type: none"> <li>○ Strategic sites should be allocated at Washpool, Ridgeway Farm, Marsh Farm</li> <li>○ Development should be permitted to the west of Swindon due to need for Swindon to expand</li> <li>○ Failure of Wiltshire and Swindon to work together on this issue</li> <li>○ Need for joint EiP for Wiltshire and Swindon</li> <li>○ RSS is still part of development plan</li> <li>○ Opposition to development west of Swindon due to need to preserve identity of settlements</li> <li>○ Should bring back rural buffer</li> </ul> </li> <li>● Strategic site should be allocated at Brynard's Hill</li> <li>● Strategic site should be allocated at land south of Wootton Bassett</li> <li>● Support for no strategic housing allocation in the area</li> <li>● Support for statement about J16</li> <li>● Housing requirement should be increased:           <ul style="list-style-type: none"> <li>○ Inadequate to meet need</li> <li>○ Should use RSS</li> <li>○ CS does not adequately account for likely delivery problems</li> <li>○ Lyneham will create need</li> <li>○ Need for contingency/flexibility</li> <li>○ Moredon Bridge development reflects Swindon's need and should not come out of Wiltshire housing figures</li> <li>○ Not enough houses for likely jobs</li> </ul> </li> <li>● Transport:           <ul style="list-style-type: none"> <li>○ J16 congestion problems: should developers pay for improvements? Will improvements adversely impact on local roads</li> <li>○ HGVs and traffic are major issues in Cricklade and Purton</li> <li>○ Need to promote sustainable transport</li> </ul> </li> <li>● RAF Lyneham:           <ul style="list-style-type: none"> <li>○ Question as to whether village boundary review will be separate to any masterplan for the base</li> <li>○ Development at Lyneham could have negative impact on roads</li> </ul> </li> <li>● Jobs should be created before more houses are built</li> <li>● Proposed changes to settlement hierarchy status of Cricklade, Purton, Lyneham and Lydiard Millicent</li> <li>● Sustainability is not clearly defined</li> <li>● Brownfield should be prioritised over Greenfield</li> <li>● Retail assessment should be qualitative as well as quantitative</li> <li>● Should be more than 30% affordable housing</li> </ul>

	<ul style="list-style-type: none"> <li>• Question as to why major development should support changes to infrastructure</li> <li>• Question as to how development will fund infrastructure</li> </ul>
Salisbury Area Strategy	<ul style="list-style-type: none"> <li>• Radical transport options as identified by the Inspector need to be added (agreed)</li> <li>• Too much development in Laverstock and Ford Parish</li> <li>• Core Policy 23 should be deleted</li> <li>• Plan period should be extended</li> <li>• Support for Maltings/CCP redevelopment</li> </ul>
Southern Wiltshire Area Strategy	<ul style="list-style-type: none"> <li>• Developers proposing to connect to a Waste Water Treatment Works will need to check with the utilities provider that there is adequate capacity.</li> <li>• Bullet points not in line with the Habitats Directive, which indicates that development must avoid damage to, and not adversely affect, Special Areas of Conservation and the habitats, species and processes which maintain their integrity. Suggested changes to wording to reflect Habitats Directive and to add reference to Salisbury Plain.</li> <li>• Core policies 24 and 25: concerned at change of policy number between Core Strategies and would like to know if new policies can be amended during this consultation.</li> </ul>
Tidworth Area Strategy	<ul style="list-style-type: none"> <li>• Housing requirement:           <ul style="list-style-type: none"> <li>○ Housing development should be phased for delivery throughout the plan period</li> <li>○ Requirement is not commensurate with settlement size or function: services, facilities and employment opportunities at Tidworth and Ludgershall are extremely limited</li> <li>○ Development at Zouch Manor farm should be included as part of supply</li> </ul> </li> <li>• Support for allocation at Drummond Park. Should be a development template at appendix A.</li> <li>• Proposals do not strictly follow the requirement of the Habitats Directive</li> <li>• Development of Brownfield should consider risks from contamination to ground and surface waters</li> <li>• Support for references to AONB</li> <li>• Support for solutions to limit impact of development on A303</li> <li>• Issues and considerations not in line with Habitats Directive: increased recreational pressure should be avoided where it may impact on European protected habitats and species</li> <li>• Need to consider foul and surface water disposal and a water cycle study as part of infrastructure requirements</li> </ul>
Tisbury Area Strategy	<ul style="list-style-type: none"> <li>• Support for balance of housing directed towards Tisbury Community Area</li> <li>• Hindon could potentially accommodate a higher level of planned housing growth than Fovant or Ludwell</li> <li>• Housing allocation should be identified at Hindon, and could include land adjacent to East Street.</li> </ul>

<p>Trowbridge Area Strategy</p>	<ul style="list-style-type: none"><li>• Trowbridge town centre:<ul style="list-style-type: none"><li>○ Town centre better suited to community starter housing not another supermarket.</li><li>○ Does not sufficiently prioritise town centre. No assurance central area will be delivered before Ashton Park.</li><li>○ Support objective for proposed urban extension to be fully integrated with the town centre.</li><li>○ Inconsistent with NPPF – proposing specific residential and office uses for Bowyers site could prevent development coming forward. Retail and leisure led development is the most appropriate on the site.</li><li>○ Area described as the ‘town centre’ needs to be properly defined.</li></ul></li><li>• No long term vision for Canal Road Estate. Need to improve B3105.</li><li>• Too much development planned on Greenfield land: Brownfield should be developed first for housing not commercial uses.</li><li>• Insufficient emphasis on giving priority to brown field sites, which leaves vulnerable to a redundant and crumbling town centre.</li><li>• Housing and employment figures are excessive and out of balance.</li><li>• Some concerns with traffic on B3105 and overall level of development.</li><li>• More proactive approach needed to stop heavy goods vehicle using Trowbridge as a route to M4.</li><li>• Suggestions for rewording of the vision statement within the area strategy.</li><li>• CP28 should include reference to aspirations to create leisure, entertainment and cultural facilities.</li><li>• There is qualitative need for additional convenience floor space in Trowbridge in line with NPPF requirements.</li><li>• Strategic site:<ul style="list-style-type: none"><li>○ Should consider impact on strategic road network, particularly A36</li><li>○ Should change map to reflect correct site area.</li><li>○ Proposals are unsound and need to be reduced in scale to reflect the existing and proposed highways infrastructure capacity.</li><li>○ The identification of a single strategic allocation, with various constraints, is not the most appropriate strategy: would be better to identify a number of smaller strategic sites on the edge of the urban area, such as land at Church Lane.</li></ul></li><li>• Bowyers site presents best opportunity for district heating system and is ideally located for retail and leisure development.</li><li>• Ecology:<ul style="list-style-type: none"><li>○ Important wood south east of Trowbridge to be preserved.</li><li>○ Trowbridge needs trees.</li></ul></li></ul>
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	<ul style="list-style-type: none"> <li>• Settlement hierarchy:             <ul style="list-style-type: none"> <li>○ Yarnbrook should not be re-classed as a small village but remain a settlement in the countryside.</li> <li>○ Support for identification of Southwick as a large village.</li> <li>○ Welcome fact that Hilperton is now classed as a large village, thereby reinstating Village Policy Limit.</li> <li>○ West Ashton would like to remain a small village however would like to retain its existing policy limit.</li> <li>○ Strategic role given to Trowbridge is supported.</li> </ul> </li> </ul>
<p>Warminster Area Strategy</p>	<ul style="list-style-type: none"> <li>• Issues and considerations not in line with Habitats Directive: increased recreational pressure should be avoided where it may impact on all European protected habitats and species. Benefits to one species should not be balanced against adverse effects on others.</li> <li>• Reference to fire station and ambulance service centre should be amended</li> <li>• Support for proposed mix of development</li> <li>• Alarmed by proposed development</li> <li>• Need to consider traffic impacts on A36</li> <li>• Question as to why land at 44-48 Bath Road is not included in the strategic site area</li> <li>• Not enough jobs to support new housing</li> <li>• Not enough school spaces and amenities</li> <li>• Infrastructure will struggle</li> <li>• Chapmanslade should be identified as a Small Village (not a Large Village)</li> <li>• Any development is likely to add to climate change</li> <li>• There should be more specific criteria associated with the development</li> <li>• Support location of strategic site and flexible approach to meeting Phosphates Management Plan</li> <li>• Master planning approach will build in delay</li> <li>• Flexible approach should be taken to affordable housing</li> <li>• Direct relationship between employment and housing should be built into CP31</li> <li>• Housing allocation should be increased and SA re-visited. Land to east of Dene should be identified for 320 dwellings.</li> <li>• Object to strategic site on western side of town. Should remove strategic site and leave allocation to NP or site allocations DPD. Alternatively, lower the number of houses.</li> <li>• Overall level of housing for Warminster is insufficient.</li> <li>• Promotion of land which was previously white belt, before becoming green belt.</li> <li>• Land north of Grovelands Way should be included as part of the urban extension.</li> <li>• The West Wiltshire Urban Extension is capable of accommodating a much higher number. The overall requirement for the site should be reassessed.</li> <li>• Land south of Bugley Barton Farm is not essential to the delivery of the majority of the site.</li> </ul>
<p>Westbury Area Strategy</p>	<ul style="list-style-type: none"> <li>• Housing:             <ul style="list-style-type: none"> <li>○ Housing requirement for Westbury is too low to</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ deliver infrastructure requirements</li> <li>○ Scale of housing growth should not be determined by the need to balance the high level of housing in the past</li> <li>● Alternative sites promoted for allocation:             <ul style="list-style-type: none"> <li>○ Land to the East of Newtown (residential)</li> <li>○ North of Westbury (mixed-use)</li> </ul> </li> <li>● Land at Station Road allocation:             <ul style="list-style-type: none"> <li>○ Site will impact negatively on use of the lake for sailing and angling</li> <li>○ Site is capable of delivering 500 homes: this higher number is necessary to deliver infrastructure requirements and public realm improvements</li> <li>○ Site should be expanded to included associated land</li> <li>○ Access to the station is an issue for buses: could be dealt with through the strategic site</li> </ul> </li> <li>● Employment:             <ul style="list-style-type: none"> <li>○ Employment in Westbury should be considered in line with Trowbridge</li> </ul> </li> <li>● Land at Mill Lane, Hawkeridge strategic site:             <ul style="list-style-type: none"> <li>○ Employment requirement for Westbury should be lower and Mill Lane, Hawkeridge site is unnecessary</li> <li>○ Enough employment land in Westbury and road network cannot accommodate additional traffic from proposed site</li> <li>○ Support inclusion of Mill Lane, Hawkeridge site</li> </ul> </li> <li>● Landscape/environment:             <ul style="list-style-type: none"> <li>○ Should be firm and robust protection for Wellhead Valley</li> <li>○ All species and habitats, not just Stone Curlews, should be protected in vicinity of SPA/SAC to be in conformity with Habitats Directive</li> <li>○ Area unsuitable for development because of water supply and natural history concerns</li> <li>○ Areas of Green Belt should be identified around Westbury</li> </ul> </li> <li>● Lafarge Cement Site             <ul style="list-style-type: none"> <li>○ Lafarge site should retain rail sidings</li> <li>○ Lafarge site should be designated as Principal Employment Area</li> <li>○ Only suitable use for Lafarge site is agricultural</li> </ul> </li> <li>● Westbury Bypass             <ul style="list-style-type: none"> <li>○ Remove saved policy T1a, Westbury Bypass</li> <li>○ Council's intentions regarding the bypass should be made clear</li> </ul> </li> <li>● HGVs are a problem in Wesbury</li> </ul>
<p>Wilton Area Strategy</p>	<ul style="list-style-type: none"> <li>● Provide employment to cater for Wilton residents rather than placing it in Salisbury</li> <li>● Need to reflect Habitats Directive which indicates that development must avoid damage to, and not adversely affect, Special Areas of Conservation and the habitats, species and processes which maintain their integrity.</li> </ul>

<p>Delivering SO1:                  CP34 – Additional                  employment land</p>	<ul style="list-style-type: none"> <li>• Support for reference in para. 6.2 to ‘targeting growth in the tourism sector’ but text should be expanded.</li> <li>• Salisbury Plain should be specified as a tourist attraction in para. 6.3.</li> <li>• Need a new policy and key outcome which promotes brownfield sites in town centres as priority places for development.</li> <li>• Need more emphasis on the need to develop brownfield sites before Greenfield. The council should maintain a list of all suitable brownfield sites.</li> <li>• NPPF section on town centre vitality should be expressed in the Core Strategy: should promote Trowbridge town sites much more strongly.</li> <li>• Support for recognition that employment sites may come forward which do not strictly meet policy but are of strategic significance.</li> <li>• Policy should recognise that employment sites not adjacent to current boundaries may be needed.</li> <li>• Policy does not allow for land adjacent to market towns, and thus potential Greenfield employment sites could be excluded.</li> <li>• Para. 6.13 is inconsistent with much of the CS and NPPF and should be deleted.</li> <li>• Suggested changes to text of CP34:                         <ul style="list-style-type: none"> <li>○ Need to clarify whether rural employment (criterion iii) refers to type or location.</li> <li>○ Criterion iv should be reworded to cover sites that are able to demonstrate that they promote the move towards a higher-value economy</li> <li>○ Criterion iv: ‘are considered essential’ is too narrow – should replace with ‘are considered beneficial’</li> <li>○ Criterion relating to sites essential to wider strategic interest (iv) is too ambiguous and should be removed.</li> <li>○ Criterion v should be reworded to refer to the NPPF.</li> <li>○ Criterion vii (relating to evidence that proposals are required to benefit local economic and social needs) is unnecessary and adds significant restriction. Contrary to NPPF and principles of the Core Strategy.</li> <li>○ Strongly recommended that criterion viii (relating to strategic employment allocations) is removed</li> <li>○ Criterion viii will be complex to implement through development management: should only relate to sites of more than 1ha.</li> <li>○ ‘Adequate infrastructure’ (ix) does not go far enough and needs to be expanded. Should include measures to encourage public rail transport of both employees and freight.</li> <li>○ CP34 should make reference to AONB policy.</li> <li>○ Wording of CP34 should be changed to stop developers putting forward repeated applications on land that has already been assessed and could</li> </ul> </li> </ul>
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	<p>undermine deliverability of strategic sites.</p> <ul style="list-style-type: none"> <li>○ Revisions should be made to the policy wording to confirm that additional, unidentified land will not be released unless it is demonstrated that an existing employment or allocated site cannot meet the proposed need for employment land.</li> <li>○ Revisions should be made to the policy wording to confirm that priority will be given to the delivery of sites specifically identified in the Area Strategies.</li> <li>○ Effectiveness of CP34 could be improved by minor rewording to differentiate the types of development which will be permitted from the circumstances in which they will be supported.</li> <li>○ Should clarify that employment land will only be supported outside the settlements in exceptional circumstances.</li> </ul> <ul style="list-style-type: none"> <li>● Policy lacks clarity: no definition of what ‘within principal settlements’ means as settlement boundaries reflect residential development and not economic development.</li> <li>● Given that much of the county do not have strategic allocations it is important that other policies allow for economic growth.</li> <li>● Need to support small businesses within the rural areas: this note seems somewhat reluctant and negative about the principle of this.</li> <li>● Intention of CP34 is broadly supported but wording of the policy is not effective as currently drafted.</li> <li>● Current drafting of CP34 is an improvement on earlier drafting.</li> <li>● Support for identification of five criteria to be satisfied by development outside settlements, particularly viii (relating to strategic employment allocations).</li> <li>● Intentions of CP34 are supported.</li> <li>● Plan needs to recognise that employment opportunities extend in uses well beyond use classes B1, B2 and B8. Should follow the NPPF position on this.</li> <li>● Wiltshire Council should consult with other bodies such as Chambers of Commerce, Town Councils, as to what they consider to be the wider strategic interest of Wiltshire and where they should be sited.</li> </ul>
<p>Delivering SO1:                  CP35 – Existing employment sites</p>	<ul style="list-style-type: none"> <li>● Support for CP35 in respect of existing employment sites.</li> <li>● Continued blanket protection of existing employment sites cannot be justified – should adopt more flexible approach.</li> <li>● Some concern about flexibility, but policy seems to allow for relocating employment sites where existing areas are not well connected.</li> <li>● Employment sites are just as important within rural areas: allowance should be made for suitable expansion of sites that may serve individual or groups of villages.</li> <li>● Plan needs to recognise that employment opportunities extend in uses well beyond use classes B1, B2 and B8. Should follow the NPPF position on this.</li> <li>● General support for CP35, but additional paragraph should be added to supporting text to require change of use</li> </ul>

	<p>applications to have regard to improving green infrastructure.</p>
<p>Delivering SO1: CP36 – Economic regeneration</p>	<ul style="list-style-type: none"> <li>• No mechanism for promoting brownfield sites outside the main settlements. CP36 should be reworded to state that “where no appropriate brownfield sites are available or deliverable within the Principal Settlements, Market Towns and Local Service Centres, regeneration of other brownfield sites outside these settlements will be supported where the development is sustainable and the land is not of high environmental value”.</li> <li>• Policy does not go far enough: Greenfield sites should not be developed when brownfield sites are available.</li> <li>• Should there be reference to SPD/DPDs as well as Neighbourhood Plans?</li> <li>• Reference to competition is not clear: regeneration can be within town centres, in which case competition is good.</li> <li>• Identification of regeneration sites should not be limited to urban areas.</li> <li>• Core Strategy does not sufficiently direct development to brownfield sites and town centres:             <ul style="list-style-type: none"> <li>○ Lack of proactive policies</li> <li>○ Doing nothing to promote town centres in line with the NPPF</li> <li>○ No focus on prioritising town centres over Greenfield sites</li> <li>○ No policies promoting offices in town centres</li> <li>○ Weak words such as ‘support’ instead of ‘promote’ or ‘prioritise’</li> <li>○ No policy on more high density office space in town centres</li> </ul> </li> <li>• Request for:             <ul style="list-style-type: none"> <li>○ Policy promoting brownfield sites in town centres</li> <li>○ Explicit expression of the NPPF emphasis on town centre vitality</li> <li>○ Stronger promotion of Trowbridge town sites</li> <li>○ Policy promoting new offices and small scale employment in town centre sites</li> <li>○ More emphasis on revitalising existing trading estates and redeveloping MOD sites.</li> </ul> </li> <li>• New policy that promotes brownfield sites in town centres as priority places for development.</li> </ul>
<p>Delivering SO1: CP37 – Military establishments</p>	<ul style="list-style-type: none"> <li>• Policy must not constrain sites on edge of settlements particularly so consideration is given to future linkages to existing town centres.</li> <li>• CP37 is not justified or consistent with national policy.</li> <li>• Requirement for all development to ‘enhance the overall character of the site’ appears unrealistic.</li> <li>• Applications for non-military development at MOD sites should be considered on their merits with consideration to other policies of the plan and national policies and initiatives.</li> <li>• MOD sites should have been assessed in the same way all other potential sites were.</li> <li>• Insufficient weight given to sustainability issues: redundant</li> </ul>

	<p>MOD sites should only be redeveloped where they meet NPPF criteria.</p>
<p>Delivering SO1: CP38 – Retail and Leisure</p>	<ul style="list-style-type: none"> <li>• CS should define a Trowbridge Town Centre Boundary in line with NPPF requirements.</li> <li>• Suitable sites should be allocated to meet full needs of retail and leisure uses.</li> <li>• Secondary frontages and primary shopping areas should be identified on the Proposals Map, in line with NPPF.</li> <li>• Requirement for retail impact assessment:             <ul style="list-style-type: none"> <li>○ Unjustified.</li> <li>○ Inconsistent with inspector’s conclusions on SWCS. Rephrase CP38 to make consistent with the SWCS threshold of 200 sqm gross.</li> <li>○ Deviates from NPPF guidance.</li> <li>○ Will negatively impact on delivery of CP48 (supporting rural life).</li> </ul> </li> <li>• Recently approved supermarket extensions show that council will not enforce this policy.</li> <li>• Document is inconsistent, too long, obscured by detail and objectives/aspirations not reflected in policies: e.g. no guidance in CP38 for enhancement of vitality or viability of town centres.</li> <li>• Retail evidence base (GVA report) should be referenced.</li> <li>• Proposed policy is welcomed, but is too late.</li> <li>• No explanation as to how objective to regenerate the town centre shopping areas will be realised.</li> <li>• More attention is needed to the approaches to the smaller Market Town centres and car parks – new policy wording suggested.</li> </ul>
<p>Delivering SO1: CP39 - Tourist development</p>	<ul style="list-style-type: none"> <li>• Support for recognition of the importance of the tourism industry to Wiltshire's economy, for the inclusion of a specific policy in relation to tourist development, and for the Council's 'target' which seeks to "increase and improve facilities for sustainable tourism".</li> <li>• Text of CP39 should be amended to refer to 'improvements, alterations and extensions to existing attractions and tourist accommodation, and provision of new tourism facilities (where appropriate).</li> <li>• Query whether a sequential assessment is necessary for all tourist proposals: would it be better to only require assessment for major proposals?</li> </ul>
<p>Delivering SO1: CP40 – Hotels, bed and breakfasts, guest houses and conference facilities</p>	<ul style="list-style-type: none"> <li>• Criteria (i) is not justified and against competition policy.</li> <li>• Question as to whether restriction of competition is allowed.</li> <li>• The first sentence of CP40 should be expanded to state that proposals will be supported “through the sensitive extension, upgrading and intensification of existing tourism accommodation facilities”.</li> </ul>
<p>Delivering SO2: to address climate change</p>	<ul style="list-style-type: none"> <li>• Need to define ‘sustainability’.</li> <li>• Support for flexible mechanisms to address climate change, in line with definition by Central Government.</li> <li>• Core Strategy is unsound because IDP does not mention issues with water resources. Sections of the Core Strategy</li> </ul>

	<p>on climate change should make reference to water shortage, and there should be a commitment to 'sustainable' water abstraction.</p> <ul style="list-style-type: none"> <li>• Existing policy has failed to achieve a 'step change'.</li> <li>• Policy should reflect findings of Sir John Harmen commission once this reports back.</li> <li>• Concern that council is leaving it to others to develop large renewable decentralised energy technologies.</li> <li>• Council should take pro-active lead on community energy and low-carbon development solutions.</li> <li>• Renewable Energy Strategy has failed.</li> <li>• Should be clear mandate that no development takes place in areas of flood risk.</li> <li>• Would like to see the council involving the community more in measures to alleviate climate change: e.g. protecting allotment sites and making new sites available, and protecting high grade agricultural land.</li> <li>• Should be pro-active measures to reduce carbon emissions by using rail to move freight.</li> <li>• Deeply concerned that further assessment is needed to determine whether ground conditions in Wiltshire may be vulnerable to climate change.</li> <li>• Concern that not enough consultation has been done on this important subject.</li> </ul>
<p>Delivering SO2:                  CP41 – Sustainable construction and low carbon energy</p>	<ul style="list-style-type: none"> <li>• Support for principle of CP41.</li> <li>• Welcome that impact on viability will be taken into account.</li> <li>• No mention in policy of use of rainwater recycling or re-use of grey water.</li> <li>• Questions as to how the policy will be monitored and how conditions will be dealt with.</li> <li>• Policy is more appropriate as part of a Development Management DPD: should be removed or simplified.</li> <li>• Policy should be redrafted in accordance with NPPF.</li> <li>• Policy should be reworded to make it firmer – too flexible at present.</li> <li>• Combined heat and power is not a low cost solution.</li> <li>• CP41 does not reflect NPPF statement that climate change is a key priority.</li> <li>• Supporting off-site renewable energy does not address the needs of specific sites</li> <li>• CP41 is unsound: not justified in terms of evidence base and whether it is appropriate when considered against reasonable alternatives, and threatens delivery of affordable housing.</li> <li>• CP41: first section - climate change adaptation:                         <ul style="list-style-type: none"> <li>○ Trees have additional benefits for climate change which should be recognised.</li> <li>○ 'Encourage' is too weak and needs to be strengthened.</li> <li>○ Words 'as practicable' should be removed, and policy should state "This should be achieved by use of most if not all of the following means.."</li> </ul> </li> <li>• CP41: second section – sustainable construction:</li> </ul>

	<ul style="list-style-type: none"> <li>○ Inclusion of specific levels of the Code for Sustainable Homes is overly prescriptive and not flexible, and will undermine a 'fabric first' philosophy.</li> <li>○ Remove specific CSH levels and target dates and replace with general wording to seek best levels of sustainability on a site specific basis.</li> <li>○ Energy and sustainability more appropriately controlled by Building Regulations.</li> <li>○ No technical assessment has been undertaken to demonstrate that policy is deliverable or viable.</li> <li>○ Question the need to exceed Building Regulations in terms of energy reduction.</li> <li>○ Should amend policy to require sustainable design and construction in accordance with future changes to Building Regulations.</li> <li>○ Core Strategy should not impose mandatory requirements for CSH</li> <li>○ Insufficient regard to the ability of smaller sites to achieve CSH requirements.</li> <li>○ Locally specific carbon targets are inconsistent with the NPPF.</li> <li>● CP41: third section – existing buildings             <ul style="list-style-type: none"> <li>○ Unclear whether retrofitting at whole street or neighbourhood level will be the responsibility of the developer or the council.</li> <li>○ Not sure why building integrated renewable or low carbon technologies are below remote low carbon across the board.</li> </ul> </li> <li>● CP41: fourth section – renewable and low-carbon energy             <ul style="list-style-type: none"> <li>○ Policy needs to be flexible rather than imposing zero-carbon standards from 2013 for developments of over 500 homes.</li> <li>○ Target for developments over 500 units to be zero carbon by 2013 is extremely ambitious and basis for this target is unclear.</li> <li>○ No evidence as to why zero carbon by 2013 for 500+ units is required or justified in Wiltshire.</li> <li>○ Zero carbon target should be reconsidered in light of the NPPF.</li> <li>○ No justification for requirement to submit a Sustainable Energy Strategy.</li> <li>○ Viability of development should be considered.</li> <li>○ Policy will impact on viability and delivery of affordable housing.</li> <li>○ Threshold for major development to meet zero-carbon standards should be much lower at 200-250 units.</li> </ul> </li> </ul>
<p>Delivering SO2:                  CP42 –                  Standalone                  renewable energy                  installations</p>	<ul style="list-style-type: none"> <li>● Support for CP42.</li> <li>● Support for reference to AONB locations and settings.</li> <li>● Current policies for renewable energy provision have failed – e.g. not delivered through ESCo's and fail community payback opportunity</li> <li>● Policy should include minimum distance threshold of 2,000</li> </ul>

	<ul style="list-style-type: none"> <li>• meters from wind turbines to dwellings.</li> <li>• Policy should include criterion to protect Best and Most Versatile Land for food production: loss of agricultural land to energy crops has not been considered.</li> <li>• Need to clarify that some renewable energy technologies require additional permissions over and above planning.</li> <li>• Performance measure should equal 376 MW.</li> <li>• Progress in Wiltshire to deliver renewable energy needs to be speeded up.</li> </ul>
<p>Delivering SO3:                  CP43 – Providing affordable homes</p>	<ul style="list-style-type: none"> <li>• The affordable housing target should be 50%, not 40%, on sites of 5 or more dwellings.</li> <li>• Strategy should seek to secure the maximum level of affordable housing (utilising 40% as a target), whilst taking into account individual site costs, the availability of public subsidy, S.106 requirements and other scheme costs.</li> <li>• Affordable Housing Viability assessment is flawed not least due to lack of developer involvement and no true examples. 40% relates to numbers but means area in the study, thus even assuming all of site is developable land it should be nearer 30%.</li> <li>• Open book viability assessments are most appropriate mechanism to decide affordable housing level. More information is required on any approach to open book exercises. This should include information on acceptable profit margins.</li> <li>• Private landlords, Parish Councils and any other groups should be able to provide affordable housing. Limiting it to registered providers means local people lose out due to regulations and bureaucracy and does accord with localism.</li> </ul>
<p>Delivering SO3:                  CP44 – Rural exceptions sites</p>	<ul style="list-style-type: none"> <li>• Restriction to 10 dwellings on exception sites appears unnecessary.</li> <li>• Cross subsidy should be removed. Concern is expressed cross subsidy will become the norm, rather than the exception, and increase landowners' expectations of the value of such sites, resulting in cross subsidy being required. Tenure mix should be provided within an affordable housing SPD.</li> </ul>
<p>Delivering SO3:                  CP45 – Meeting Wiltshire's housing needs</p>	<ul style="list-style-type: none"> <li>• The type and mix of accommodation should be determined by the development industry.</li> <li>• Core Policy 45 should allow greater flexibility for viability. The policy should also consider market demand.</li> <li>• Housing requirement does not adequately consider the supporting evidence. An alternative model should be employed which draws upon other variables.</li> <li>• Policy approach will stifle delivery and as a consequence put market housing prices up. The delivery of more homes will help make homes more affordable.</li> </ul>
<p>Delivering SO3:</p>	<ul style="list-style-type: none"> <li>• Extra care homes should not need to provide affordable</li> </ul>

<p>CP46 – Meeting the needs of Wiltshire’s vulnerable and older people</p>	<p>homes.</p>
<p>Delivering SO3: CP47 – Meeting the needs of Gypsies and Travellers</p>	<ul style="list-style-type: none"> <li>• Target should be expressed as part of the overall housing figure and not identified separately. Temporary permissions should be taken into account</li> <li>• Use of the Housing Market Area as a basis for targets is unclear. Provision should be sought on strategic sites (1% of total suggested). Sites should contribute to local infrastructure and services through Section 106.</li> <li>• There is no essential need to locate Travellers in the countryside therefore should be located close to possible places of work and local facilities.</li> <li>• Policy fails to define who qualifies as a Gypsy or Traveller.</li> </ul>
<p>Delivering SO4: helping to build resilient communities</p>	<ul style="list-style-type: none"> <li>• By allocating only limited development in rural areas, many villages will experience population loss, continued out-commuting, loss of local services and businesses and a lack of affordable housing</li> <li>• Need to plan for provision of emergency service facilities and infrastructure, meeting halls and places of worship</li> </ul>
<p>Delivering SO4: CP48 – Supporting rural life</p>	<ul style="list-style-type: none"> <li>• Should not be restricted to agricultural or redundant buildings, all rural buildings should be considered in the policy without reference to 'redundant' or 'architectural merit'.</li> <li>• NPPF demands a comprehensive and suitably flexible regime for the preference for re-use of existing rural buildings and previously developed land.</li> <li>• Buildings often need significant re-building particularly as part of conversion works to meet building regs.</li> <li>• The wording of the first section of this policy is inadequate to protect the countryside from inappropriate development.</li> </ul>
<p>Delivering SO4: CP49 – Protection of services and community facilities</p>	<ul style="list-style-type: none"> <li>• No mention in Core Policy 49 of protecting community facilities in urban areas, only rural areas.</li> <li>• Need greater support for village shops and post offices and community ownership-led enterprise. The community ownership section of the policy needs to make clear local councils will be encouraged to set up local shops.</li> <li>• Buildings which become vacant as a result of relocation should be treated as any other building for which planning permission is sought.</li> <li>• Simply having a policy to resist market forces will not</li> </ul>

	benefit the remaining facilities and will cause them to dilapidate; many pubs face closure unless they can significantly increase their trade.
Delivering SO5: CP50 – Biodiversity and geodiversity (additional detail to be added)	<ul style="list-style-type: none"> <li>• General support</li> <li>• Needs stronger protection of statutory sites</li> <li>• Conservation credits</li> <li>• Strengthen the requirement for enhancement</li> <li>• Policy is too detailed</li> <li>• Contributions should be reasonable and proportionate</li> <li>• WFD objectives</li> </ul>
Delivering SO5: CP51 – Landscape (additional detail to be added)	<ul style="list-style-type: none"> <li>• General support</li> <li>• BMV agricultural land</li> <li>• Need to protect against coalescence</li> <li>• Need to strengthen wording</li> <li>• Too imprecise</li> <li>• Too detailed</li> <li>• Not in conformity with NPPF</li> <li>• Protection of AONBs:           <ul style="list-style-type: none"> <li>○ Need to consider settlement strategy in AONBs</li> <li>○ Need to consider housing numbers in AONBs</li> </ul> </li> </ul>
Delivering SO5: CP52 – Green infrastructure (additional detail to be added)	<ul style="list-style-type: none"> <li>• General support</li> <li>• Strengthen wording</li> <li>• Assessment / enhancement of offsite GI</li> <li>• Coalescence</li> <li>• Open space standards</li> <li>• Definition of GI</li> <li>• Too detailed</li> </ul>
Delivering SO5: CP53 – Canals (additional detail to be added)	<ul style="list-style-type: none"> <li>• General support</li> <li>• Use of SUDS</li> </ul>



	<ul style="list-style-type: none"> <li>• Recognition of canals for sustainable transport</li> <li>• Saved policies for K&amp;A are out of date</li> <li>• Loss of community facilities</li> <li>• Need to balance users' needs</li> <li>• Need to consider impacts of new alignments</li> </ul>
Delivering SO5: CP54 – Cotswold Water Park	<ul style="list-style-type: none"> <li>• General support</li> </ul>
Delivering SO5: CP55 – Air Quality and CP56 – Contaminated land	<ul style="list-style-type: none"> <li>• Support.</li> </ul>
Delivering SO5: CP57 – Ensuring high quality design and place shaping	<ul style="list-style-type: none"> <li>• Policy is considered more appropriate as part of a development management development plan document (or SPD) as the policy will not help meet the strategic objectives of the core strategy. Therefore policy should be removed or simplified.</li> <li>• Specific detail within the policy should be considered within a subsequent SPD/DPD.</li> <li>• CP57 is too detailed which will make it difficult to apply. Subsections of the policy should be simplified and consolidated.</li> <li>• Support the objectives and approach of CP57. However, it would be helpful for certain terms to be clarified such as 'sustainability' and 'exceptional/high quality design'.</li> <li>• Policy approach is excellent along with all supporting sections. However, concern over how a number of specific terms will be interpreted including 'complementary to the locality', and 'effectively integrate the building into its setting'.</li> <li>• Agree that in order to ensure the proper planning and phasing of a major site (particularly previously undeveloped areas), these proposals should be based upon a design brief / master plan which should be agreed prior to the submission of the planning application.</li> </ul>
Delivering SO5: CP58 – Ensuring the conservation of the historic environment	<ul style="list-style-type: none"> <li>• CP58 should be extended to include reference to the alteration and extension where appropriate of redundant and under-used historic buildings and areas.</li> <li>• Paragraph 4 of CP58 is misleading and therefore unjustified in that there is no caveat as to whether or not exploitation of benefits would be both appropriate and sensitive in nature.</li> <li>• The Plan fails to positively address Wiltshire's heritage assets at risk. There is no indication of an intention to continue to carry out at risk surveys in future to ensure</li> </ul>

	<p>there is an understanding of what is 'at risk' nor a clear strategy in response to those assets at risk.</p> <ul style="list-style-type: none"> <li>• CP58 requires the inclusion of a reference to registered battlefields. Also the reference to setting at i, iii, iv, v appear to be superfluous.</li> <li>• Clarity needs to be provided regarding the scope, purpose and timing of the additional guidance to aid the application of CP58 otherwise it may not come to fruition.</li> <li>• Reference to the protection of the World Heritage Site within CP58 should include reference to the protection of setting.</li> </ul>
<p>Delivering SO5:                  CP59 – The Stonehenge, Avebury and Associated Sites World Heritage Site and its setting</p>	<ul style="list-style-type: none"> <li>• CP59 is incomprehensible. The wording of the policy also indicates that the obligation under the World Heritage Convention is either misunderstood or inconsistently expressed.</li> <li>• CP59 does not clearly express an understanding of Outstanding Universal Value (OUV). OUV is an abstract concept that cannot be managed. The policy emphasis should be upon the protection of the site and its setting rather than OUV.</li> </ul>
<p>Delivering SO6:                  CP60 – Sustainable Transport</p>	<ul style="list-style-type: none"> <li>• Purton waste site is not most efficient or sustainable for transport and does accord with overall stated policy.</li> <li>• CP60 &amp; 66 both make reference to a Local Transport Plan large parts of which have still not been delivered.</li> <li>• The LTP is not complete and a number of strategies are outstanding.</li> <li>• Improving journey time reliability is only achievable in the short term and conflicts with the sustainable transport aims.</li> <li>• CP60 should also recognise that in relation to tourism uses, there is often no feasible alternative to the private car.</li> <li>• Policy too weak to tie in with stated objectives and deliver a major modal shift. Transport analysis should look at issues and options for buses, rail and integration of modes for the area. Introduce a policy for public transport rather than 'sustainable transport'.</li> <li>• Policy should include the re-opening of railway stations.</li> </ul>

	<ul style="list-style-type: none"> <li>Proposals for Chippenham are contrary to bullets iii. and vi.</li> <li>Policy is more appropriate as part of a Development Management DPD.</li> <li>Restricting the amount of housing to address out commuting can severely limit funding for sustainable transport. Also need to consider locations with a reasonable chance that a bus service will be used by residents and that a service can continue after legal agreements have ceased.</li> <li>Policy is not precise or meaningful in terms of its objectives, method or monitoring and is too vague to be convincing.</li> <li>Agree that developments should be located in the most sustainable locations, but should take account of facilities which may be located in adjoining authorities, such as the importance of Swindon to the eastern fringe of North Wiltshire.</li> </ul>
<p>Delivering SO6:                  CP61 – Transport and Development</p>	<ul style="list-style-type: none"> <li>Policy TR14 of Salisbury District Plan should be reinstated.</li> <li>Policy wording does not refer to the reuse of buildings. The wording does not comply with the provisions of NPPF.</li> <li>Concern re transport proposals at J16.</li> <li>Policy fails to address the layout of new development. Re-word policy to promote good walking and cycling environment.</li> <li>Criterion (ii) should include reference to safe access to the rail network as well as to the highway network.</li> <li>May be more appropriate to provide offsite waiting than on site facilities to meet worst case scenarios, particularly for town centre locations.</li> <li>Unsure of implications of this policy, particularly the operation of the hierarchy.</li> <li>Welcome the objective to reduce the need to travel and encourage the use of sustainable transport alternatives. However, where a contribution is sought towards transport improvements it must be set out in a planning obligations DPD which is examined as part of the LDF process, and / or meet the tests of the CIL Regulations 2010</li> <li>There needs to be provision in the design of road layouts for parking in front of villages facilities.</li> </ul>
<p>Delivering SO6:                  CP62 – Development impacts on the transport network</p>	<ul style="list-style-type: none"> <li>The 'national primary route network' and 'built up areas' are not been defined in the Core Strategy: need clarification.</li> <li>Developers should be allowed to use contributions more flexibility to improve cycle and pedestrian networks beyond the development site.</li> <li>This policy appears to conflict with the proposals for</li> </ul>

	<p>Chippenham.</p> <ul style="list-style-type: none"> <li>• In order to ensure the construction and operation of the transport network it will be appropriate to pool funding from a number of developments.</li> </ul>
<p>Delivering SO6: CP63 – Transport strategies</p>	<ul style="list-style-type: none"> <li>• CP63 needs to make reference to the Options Assessment Report and conclusion of 'Radical' transport option as specified in the inspectors report.</li> <li>• References to the Salisbury Transport Strategy need to be re-instated in the Wiltshire Core Strategy.</li> <li>• CP63 states that a package of transport measures will be identified in Salisbury and delivered through developer contributions. None of these appears in the template for the strategic sites, without explicit reference to Salisbury Transport Plan contributions will not be able to be sought.</li> <li>• Indicators provided in the CP63 are inadequate.</li> <li>• Policy should not only relate to the principal towns, but should also relate to the market towns, and should include reference to improvements to rail transport.</li> </ul>
<p>Delivering SO6: CP64 – Demand management</p>	<ul style="list-style-type: none"> <li>• Standards should reflect needs of rural areas with poor public.</li> <li>• Business owners should not be compelled to charge for such spaces.</li> <li>• Concerned about the preference to use unallocated communal car parking: this could result in potential crime and community safety issues.</li> </ul>
<p>Delivering SO6: CP65 – Movement of goods</p>	<ul style="list-style-type: none"> <li>• Plan does not properly address cross boundary movement of goods/freight.</li> <li>• Thingley Junction should be mentioned as an example of a site which should be safeguarded.</li> <li>• There needs to be a modal shift towards getting more large volumes of freight on to rail and water transport.</li> </ul>
<p>Delivering SO6: CP66 – Strategic transport network</p>	<ul style="list-style-type: none"> <li>• Add Westbury railway station to list of stations to be improved.</li> <li>• Options evaluated in SA are poor quality.</li> <li>• Improving journey time reliability is only achievable in the short term and conflicts with the sustainable transport aims.</li> </ul>

	<ul style="list-style-type: none"> <li>• Wiltshire and B&amp;NES need to work together and take an integrated view of the options, benefits and problems associated with managing HGVs from Southampton to the M4.</li> <li>• Description of Transwiltts rail line is missing. Should mention joint working with West of England Partnership on transport.</li> <li>• The inclusion of Corsham railway station is welcomed.</li> <li>• Greater emphasis for the need for railway station at RWB especially in relation to developments at Lyneham.</li> <li>• More detail about proposals should be in policy. Unhappy at pressure being exerted by Swindon from development and design.</li> <li>• Policy is more appropriate as part of a Development Management DPD.</li> <li>• It is considered that the policy should be amended to make reference to the proposed access off the A350 to serve land at Showell Farm.</li> <li>• There is concern that Melksham Station is being put in the same category as Corsham and Wootton Bassett even though the latter two towns do not actually have railway stations as yet.</li> </ul>
<p>Delivering SO6: CP67 – Flood risk</p>	<ul style="list-style-type: none"> <li>• Should be a general presumption in favour of locating all new development outside flood zones 2 and 3. CP67 should make this absolutely clear.</li> <li>• Risk of flooding should be viewed as part of a range of planning considerations rather than an absolute constraint.</li> <li>• CP67 is too detailed and should be included in a Development Management DPD.</li> </ul>
<p>Delivering SO6: CP68 – Water resources</p>	<ul style="list-style-type: none"> <li>• CP68 offers little or no support for the protection of water resources in the River Kennet.</li> <li>• CP68 does not offer the level of restraint required to limit over abstraction in the River Kennet catchment. Towns like Marlborough should not be permitted to grow without first ensuring the issue of water supply is robustly addressed.</li> <li>• The Core Strategy is unsound because it fails to adequately and sustainably address the issue of water supply / security.</li> <li>• CP68 fails to address the requirement that <u>all</u> development</li> </ul>

	<p>should present water efficiency measures.</p> <ul style="list-style-type: none"> <li>• The trend of over abstraction of many of Wiltshire’s rivers cannot be allowed to continue.</li> <li>• Overall levels of growth:             <ul style="list-style-type: none"> <li>○ The Plan should reduce the projected housing and employment land quantum in order to ensure that water resources and natural systems are not compromised.</li> <li>○ The Plan is not supported by evidence to prove that water supplies can be delivered to support growth in a sustainable manner.</li> </ul> </li> </ul>
<p>Delivering SO6: CP69 – Protection of the River Avon SAC</p>	<ul style="list-style-type: none"> <li>• CP69 should provide the same level of protection to the River Kennet SSSI as that afforded to the River Avon SAC.</li> <li>• CP69 is too detailed and should appear in a Development Management DPD.</li> <li>• CP69 must be re-drafted to fully comply with the rigour of the Habitats Directive and the requirements of the Appropriate Assessment regime.</li> </ul>
<p>7. Monitoring and review</p>	<ul style="list-style-type: none"> <li>• Mitigation already identified in previous studies needs to be included in all of the individual Place Shaping Requirements to ensure future development conserves the historic environment.</li> <li>• There are inaccuracies in relation to the 'Land East of the Dene'.</li> <li>• Recommendation to include additional policy targets including:             <ul style="list-style-type: none"> <li>○ Contributions secured to maintain and improve heritage assets.</li> <li>○ The reduction in the number of heritage assets on the national at risk register.</li> </ul> </li> </ul>
<p>8. Glossary and common acronyms</p>	<ul style="list-style-type: none"> <li>• Request for definition of ‘sustainable development’</li> <li>• General request for clarification in a number of places in the glossary.</li> </ul>
<p>Appendix A: Development templates for strategic allocations</p>	<ul style="list-style-type: none"> <li>• General comments:             <ul style="list-style-type: none"> <li>○ Development templates have not been subject to formal public consultation.</li> <li>○ Welcome that strategic allocations will be brought forward through a master planning process agreed between the community, LPA and the developer.</li> <li>○ Clarification needed that if the community identify further requirements not set out in the development templates then these must also be considered.</li> <li>○ Core Strategy includes only a brief generic reference to instances where sites will affect heritage assets, including their setting, and features of archaeology of significance. This should be</li> </ul> </li> </ul>

	<p>revised to reflect national planning policy more fully, particularly paragraphs 169 and 170 of the NPPF.</p> <ul style="list-style-type: none"><li>○ 40% affordable housing might not be achievable. All provisions and contributions should be subject to viability. Development templates should be revised to reflect this or it should be an upper limit. The SHMA is only a snapshot in time and it is not necessarily the case that new urban extensions should seek to replicate the precise proportions.</li><li>● Issues affecting more than one site:<ul style="list-style-type: none"><li>○ In the development templates for land at Salisbury Road, Marlborough and land west of Warminster the capacity of the AONB's to produce sustainable wood fuel should be considered.</li><li>○ Natural England disagree the landscape at the West Warminster Strategic Site and land at Salisbury Road, Marlborough have the capacity to accommodate the allocation with appropriate mitigation. Natural England advise that the Core Strategy is unsound on this basis and request that a full Landscape and Visual Impact Assessment be undertaken. Should this conclude that the sites cannot be developed without unacceptable landscape changes, then the strategic allocation must be withdrawn.</li></ul></li><li>● Land at Kingston Farm, Bradford on Avon:<ul style="list-style-type: none"><li>○ Remove requirement for pedestrian/cycling link to the town centre which avoids the B3107</li><li>○ Land identified as 'indicative greenspace' is not available for public use.</li><li>○ Employment quantum should be expressed as new build floorspace (and should be reduced).</li></ul></li><li>● Chippenham sites:<ul style="list-style-type: none"><li>○ Should remove reference to delivery of a railway bridge in relation to Rawlings Green and the North Chippenham Strategic Site.</li></ul></li><li>● North Chippenham Strategic Site:<ul style="list-style-type: none"><li>○ Amend extent of strategic site to reflect current application.</li><li>○ Remove restrictive phasing for employment/housing.</li><li>○ Template should recognise need to ensure viability on this site.</li></ul></li><li>● Rawlings Green, East Chippenham Strategic Site:<ul style="list-style-type: none"><li>○ Remove reference to employment development coming forward in advance of further residential development.</li><li>○ Amend text in relation to employment provision, including amending to cover all relevant use classes and to include reference to demand and viability.</li></ul></li><li>● South West Chippenham Strategic Site:<ul style="list-style-type: none"><li>○ Ensure that delivery of employment land is not over burdened by contributions.</li></ul></li></ul>
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	<ul style="list-style-type: none"><li>○ Unclear what the Chippenham strategy will require.</li><li>● Land at Horton Road, Devizes:<ul style="list-style-type: none"><li>○ Natural England advise that the area of the site retained for public recreation should be landscaped naturally and screened from the main development. Footpath BCAN6 should be linked to the area.</li></ul></li><li>● Land at Drummond Park, Ludgershall:<ul style="list-style-type: none"><li>○ Outline Drummond Park planning application was designed on the basis that a future phase of development would come forward on the site to the west to provide future pedestrian and street linkages. This site should be reinstated as per the 2011 version of the CS.</li></ul></li><li>● Land at Salisbury Road, Marlborough:<ul style="list-style-type: none"><li>○ Add potential for hotel use.</li></ul></li><li>● Ashton Park Urban Extension, Trowbridge:<ul style="list-style-type: none"><li>○ Strategic site should include land south of West Ashton Road.</li><li>○ Should be a requirement for 100m buffer for all ancient woodland.</li><li>○ Promoters of the site believe a 100m buffer would be excessive, and the extent of the buffer should be determined as part of the masterplan and design process.</li><li>○ Promoters of the site note that all provisions and contributions will be subject to viability.</li><li>○ Important that the pro-forma only relates to land within the development.</li></ul></li><li>● Land at West Warminster<ul style="list-style-type: none"><li>○ Core Strategy is relatively silent on development affecting Cley Hill Scheduled Monument and its setting.</li><li>○ Precise capacity should not be determined until after the master plan has been undertaken. Land south of Bugley Barton Farm is not essential to the delivery of the majority of the site. The overall requirement at the West Warminster Strategic Site should be reassessed.</li></ul></li><li>● Land at Mill Lane, Hawkeridge, Westbury:<ul style="list-style-type: none"><li>○ Comments covered in the Westbury area strategy section.</li></ul></li><li>● Land at Station Road, Westbury:<ul style="list-style-type: none"><li>○ Persimmon Homes &amp; BRB (Residuary) Ltd are concerned about the viability of the Station Road strategic site. The site should be enlarged and the overall scale of development increased to 500 dwellings. An alternative site area is proposed.</li></ul></li><li>● South Wiltshire Development Templates:<ul style="list-style-type: none"><li>○ Assessment of essential infrastructure requirements has not been as rigorous as for those in the rest of the county. Natural England raises a concern about development having adequate accessible natural greenspace.</li><li>○ Format of South Wiltshire IDP and development</li></ul></li></ul>
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	<p>templates should be the same as the rest of the county.</p> <p>Detailed comments on infrastructure provision, other requirements and the wording of the templates will be available in an appendix to the wider consultation report. In addition, some comments relating to the strategic sites are dealt with in the relevant community area sections.</p>
<p>Appendix B: List of topic papers</p>	<ul style="list-style-type: none"> <li>• Not all documents were available during the previous consultation (June to August, 2011).</li> <li>• Topic Paper 8 should include fire mains where it mentions fire hydrants.</li> <li>• The 35% Brownfield target, referenced in Topic Paper 2, is at odds with SO7 and the NPPF.</li> <li>• Topic Paper 2 needs some proof-reading, e.g. paragraph 2.1, which states that there will be further revision before the final policy wording before the end of 2011.</li> </ul>
<p>Appendix C: Housing trajectory</p>	<ul style="list-style-type: none"> <li>• No detailed demonstration of the 5 year land supply.</li> <li>• Lack of evidence to support the proposed housing numbers.</li> <li>• Information about discussions with developers hasn't been included.</li> <li>• Supply from other three former districts (not Salisbury from where it is assumed that early delivery of sites will come) is unlikely until later in the plan period.</li> <li>• Housing trajectory:             <ul style="list-style-type: none"> <li>○ Not detailed enough in the Core Strategy to allow analysis to be undertaken. It is not clear what sites are included and how these are to be implemented.</li> <li>○ Housing trajectories are too optimistic, especially in the first 5 years of the plan.</li> <li>○ Questionable whether trajectory has taken into account latest LDS or recent economic downturn.</li> </ul> </li> </ul>
<p>Appendix D: Saved policies and policies replaced</p>	<ul style="list-style-type: none"> <li>• Policy T1a Westbury Bypass Package. Large public response looking to remove the bypass policy as has been rejected in a public enquiry.</li> <li>• Policies HC2, ED21 &amp; ED22 (Kennet District Local Plan) should be removed as planning for sites has overtaken policy for a variety of reasons.</li> <li>• Policies R7, H8 &amp; H9 West Wilts Local Plan should be</li> </ul>

	<p>saved for variety of reasons. Policy E1a needs to be checked as sites appear as different sizes.</p>
<p>Appendix E: List of settlement boundaries retained and Appendix F: List of settlement boundaries removed</p>	<ul style="list-style-type: none"> <li>• Proposed removal of settlement boundaries has not been communicated to the electorate in an active manner. There has not been an open debate on this matter.</li> <li>• Durrington and Bulford need to be listed in appendix E. Changes proposed to Ramsbury boundary with reference to site at land rear of Penllyne.</li> </ul>
<p>Appendix G: Principal Employment Areas</p>	<ul style="list-style-type: none"> <li>• The Principal Employment Area at Southampton Road, Salisbury should reflect the existing employment provision and be extended accordingly.</li> </ul>
<p>Appendix H: Proposals map</p>	<ul style="list-style-type: none"> <li>• The proposed Wilts and Berks canal route wasn't on the Proposals Map.</li> <li>• The proposals map wasn't made available to comment on as part of this consultation therefore not allowing comments to be made.</li> </ul>
<p>Infrastructure Delivery Plan</p>	<ul style="list-style-type: none"> <li>• Strategic infrastructure:             <ul style="list-style-type: none"> <li>○ Add need for improvements to J17 of the M4</li> <li>○ Provisions for Corsham Cycle Network and green corridor between Chippenham and Corsham are not likely to be delivered by the Core Strategy.</li> </ul> </li> <li>• Strategic sites:             <ul style="list-style-type: none"> <li>○ Clarify which of the Chippenham sites need to contribute to the railway crossing.</li> <li>○ Rawlings Green, Chippenham site is likely to be expected to deliver infrastructure not identified in the IDP.</li> <li>○ IDP does not mention the need for a country park at Rawlings Green, Chippenham.</li> <li>○ Amend costs of site access to Land at Mill Lane, Westbury.</li> <li>○ IDP contains reference to infrastructure to be delivered with Land South of Netherhampton Road strategic allocation, which has been removed.</li> </ul> </li> <li>• Level of information on infrastructure projects:             <ul style="list-style-type: none"> <li>○ Infrastructure schemes need to be fully justified,</li> </ul> </li> </ul>

	<p>costed and include information on how and when they will be delivered.</p> <ul style="list-style-type: none"><li>○ Change format of the south Wiltshire sections of the IDP to match those of the rest of the county.</li><li>○ IDP should provide relevant information on water resources</li><li>○ IDP should place more importance on town centres.</li></ul> <ul style="list-style-type: none"><li>● Preparation of the IDP:<ul style="list-style-type: none"><li>○ Infrastructure requirements need to be agreed between the council, infrastructure providers and developers.</li><li>○ When will the IDP be reviewed?</li></ul></li><li>● Publication of the Infrastructure Delivery Plan<ul style="list-style-type: none"><li>○ The IDP was not included as evidence for earlier stages of the consultation.</li></ul></li></ul>
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## APPENDIX 2: SCHEDULE OF PROPOSED CHANGES TO WILTSHIRE CORE STRATEGY PRE-SUBMISSION DOCUMENT DEVELOPMENT PLAN DOCUMENT (DPD)

- The following table sets out changes proposed to be made in the interests of improving clarity and understanding of the document and to update it to improve consistency with the National Planning Policy Framework (NPPF). These are considered to be minor in nature and not alter the overall substance of the Core Strategy.
- It is proposed that this be submitted to the Secretary of State alongside the DPD.

NB: Page numbers refer to those within the printed version of the DPD and not the PDF version on the Council's website.

### Part A: Minor changes

Ref'	DPD Ref'	Change	Reason
	<b>Chapter 1- Introduction</b>		
	Page 3, Insert new paragraph after 1.1	<i>Add paragraph to read:</i>  <i>'The purpose of the planning system is to contribute to the achievement of sustainable development. The policies and proposals contained within this strategy, taken as a whole, constitute what sustainable development in Wiltshire means in practice for land use planning.'</i>	Recognises the emphasis within the NPPF to deliver sustainable development. Adds clarity to the local meaning of sustainable development in relation to land use planning.
	Page 3, Para 1.3, Bullet 5	<i>Amend sentence to read:</i>  <i>'...enhancement of the natural, historic and built environments, <del>wherever possible</del>, including maintaining, enhancing...'</i>	No other bullet qualified in this way. Brings continuity to approach.
	Page 4, Para 1.7	<i>Add to end of paragraph:</i>  <i>'...to identify the approach that best suits the needs of each individual community <u>this may include supplementary guidance in the form of village design statements...</u>'</i>	Recognises the importance, and significance, of village design statements.
	Page 5, Para 1.10	<i>Add new bullet to list of strategies and plans:</i>  <i><u>'Adopted and emerging plans of neighbouring authorities.'</u></i>	Highlights that the plan has regard to the plans and strategies of neighbouring authorities.
	Page 6, After Para 1.14	<i>Add new paragraph to read:</i>  <b><u>'A strategy that is based on collaborative working relationships</u></b>  <u>The Localism Act introduces a 'duty to cooperate which requires local authorities to work with neighbouring authorities and other prescribed bodies in preparing their development plan documents. Section 110 of the Localism Act inserts a new section 33A into the Planning and Compulsory Purchase Act 2004 to bring in this duty.</u>	Acknowledges that the council has been fulfilling its duty to co-operate.

Ref'	DPD Ref'	Change	Reason
		<p><u>Wiltshire Council has undertaken proper and meaningful discussion with neighbouring authorities and prescribed bodies to inform the policies in this core strategy and to understand the implications of the proposed policies for these organisations<sup>1</sup>. In the earlier stages of plan preparation neighbouring authorities and prescribed bodies were invited to comment at each stage of consultation and their views were taken into consideration at each stage in the plan's development. In some instances specific working parties were created as a forum to discuss specific issues. Since the introduction of the 'duty to co-operate' in November 2011 further discussions have taken place to understand better the specific relationships between the many authorities which abut the council's area (see figure xx). Arising from these discussions two forms of relationship have been identified:</u></p> <ul style="list-style-type: none"> <li>• <u>Strategic cross boundary relationships relating to homes, jobs and infrastructure;</u></li> <li>• <u>Locally significant relationships relating to specific areas and land uses for example Cotswold Water Park and North Wessex Downs AONB.</u></li> </ul> <p><u>There is a significant cross border relationship with Swindon Borough Council. Historically it has been proposed that part of Swindon's housing need be met in an area to the west of Swindon within Wiltshire. Due to the levels of growth being proposed for Swindon through Swindon Borough Council's emerging Core Strategy there is no longer a need to provide growth on the west due to alternative proposals. Should the proposed strategy and level of growth for Swindon change or be amended through continuing consultation on their emerging core strategy Wiltshire Council and Swindon Borough Council will continue to discuss the most appropriate strategy for Swindon's future growth. If the west of Swindon area becomes a potential option for growth again appropriate consultation will be undertaken and if necessary the two authorities will pursue a single issue joint Site Allocations DPD for the west of Swindon area.'</u></p>	

<sup>1</sup> For further detail refer to the statement on how Wiltshire has sought to fulfil the duty to co-operate provided as part of the evidence base to support the core strategy.

Ref'	DPD Ref'	Change	Reason
<b>Chapter 2 – Spatial Portrait</b>			
	Page 13, After Para 2.14	<p><i>Add following text to read:</i></p> <p><b><u>'4. Planning for resilient communities</u></b></p> <p><u>Wiltshire is a large and diverse part of the Country and the issues and challenges within it vary from place to place. It would be a mistake to develop a strategy which is based on a 'one size fits all' premise. The predominant rural character of Wiltshire means that transport choices to access a range of services are often extremely limited and especially in the more remote rural areas there is a reliance on the private motor car. Identifying the role that Wiltshire's settlements have with regard to the sustainable location of services, jobs and housing is an important consideration in trying to balance the needs of promoting a sustainable pattern of growth with the needs of more rural communities. A key challenge is to ensure that this Core Strategy responds to the distinctive character of specific places throughout Wiltshire and is effectively tailored to addressing their particular sets of problems.'</u></p>	Drafting error. First part of Challenge 4 omitted from pre-submission document.
<b>Chapter 3 – Spatial Vision</b>			
	Page 15, Spatial Vision	<p><i>Revise second paragraph of 'spatial vision' to read:</i></p> <p><u>'Wiltshire's important natural and built and historic environment will have been safeguarded and...'</u></p>	Change requested by English Heritage for clarity.
	Page 16, Para 3.4, Bullet 1  Page 27, Para 4.22	<p><i>Add footnote to 27,500 new jobs to read:</i></p> <p><u>'Page 7, Para 2.1, Future Employment Needs in Wiltshire- Employment Floorspace and Land Forecasts – April 2011.'</u></p> <p><i>Add footnote to '178 ha' to read:</i></p> <p><u>'This is made up of 132 ha as identified on page 87 of Topic Paper 7: economy plus that that employment land identified in the South Wiltshire Core Strategy.'</u></p>	Adds clarity and signpost to how the figure of 27,500 new jobs and 178ha of employment land is arrived at.
	Page 16, Para 3.4, Add after final bullet point	<p><i>Add new key outcome after final bullet point to read:</i></p> <p><u>'The provision of 16 + education including higher education will have been enhanced especially to provide trained employees necessary to deliver economic growth from our target sectors'</u></p>	This area had been omitted from the pre-submission draft. It is however fully supported by the evidence as summarised in the economy TP.
	Page 18, Para 3.9, First sentence	<p><i>Amend sentence to read:</i></p> <p><u>'Wiltshire's rich and diverse natural, historic and built environments are a significant asset and this strategy will be based on taking steps to use these as a catalyst to attract inward</u></p>	Minor amendments will bring clarity to the paragraph and strike a more appropriate balance.

Ref'	DPD Ref'	Change	Reason
		investment in a manner which <del>as far as possible</del> <u>also at the same time</u> protects and enhances them.'	
	Page 19, Para 3.10, Bullet 2,	<i>Amend bullet to read:</i>  'Appropriate place shaping infrastructure, such as leisure and open space, green infrastructure, libraries, <u>meeting places, places of worship</u> , public art and cultural facilities, will have been secured on a priority basis.'	Recognises other important place making infrastructure.
<b>Chapter 4 – The Spatial Strategy</b>			
	Page 23, Para 4.29	<i>Amend paragraph to read:</i>  '...infill is defined as a small gap with the village that is only large enough for <u>not more than a few dwellings, generally only one</u> dwelling. Exceptions to this approach will only be considered through the neighbourhood plan process.'	For clarification and flexibility (previously approved by Wiltshire Cabinet).
	Page 27, Para 4.24, Bullet 6	<i>Amend bullet to read:</i>  'non-strategic sites identified through community-led planning policy documents, including neighbourhood plans <u>village design statements, and neighbourhood development orders</u> .'	Recognises other appropriate sources of supply.
	Page 27, Para 4.26	<i>Insert new words for consistency with Core Policy 2:</i>  '...the Core Strategy only allocates sites that are strategically important for the delivery of the overall strategy for Wiltshire, additional specific sites (non-strategic allocations) <u>on the edge of settlements adjacent or well related to the limits of development</u> may also need to be identified'	Minor amendment to supporting text to improve consistency with Core Policy 2.
	Page 28, Paragraph 4.27	<i>Amend paragraph to read:</i>  'The sources of supply have been assessed to ensure that there is a deliverable supply of housing (with additional contingency <u>to comply with the NPPF</u> ) relative to the targets for defined sub county areas, which are based on the housing market areas (HMAs) presented below. <u>This is detailed in Appendix C - Housing Land Supply</u> .'	For clarification and in line with the NPPF.
	Page 28, Para 4.28	<i>Replace paragraph to read:</i>  'These housing market areas (HMAs) <u>form the appropriate scale for disaggregation across Wiltshire, as they define areas within which the majority of household moves take place. It is against these HMA requirements that housing land supply will be assessed. This is in accordance with the methodology identified in the NPPF. However, in order to ensure an appropriate distribution of housing across Wiltshire that supports the most sustainable pattern of growth, requirements</u>	Adds clarification to approach with regards to disaggregation and housing requirement.



Ref'	DPD Ref'	Change	Reason
		<p><u>are also provided at a community area and settlement level within the Core Strategy. These more localised requirements as set out within the Area Strategy Core Policies are intended to prevent settlements receiving an unbalanced level of growth justified by under or over delivery elsewhere. Neighbourhood Plans should not be constrained by the specific housing requirements within the Core Strategy and additional growth may be appropriate consistent with the Settlement Strategy (Core Policies 1 and 2). In addition, sustainable development within limits of development or at Small Villages should not be constrained just because requirements have been reached. For these reasons the housing requirement is shown as "at least".</u></p>	
	Page 30/31/32, Core Policy 2	<p><i>Amend first paragraph to read:</i></p> <p>'Development outside of the limits of development, as defined on the <u>Proposals Map</u>, will only be permitted where it has been identified through community-led planning...'</p> <p><i>Amend fifth paragraph to read:</i></p> <p>'Proposals for development <u>at the small villages</u> will be supported where they seek to meet local housing needs and/or employment...'</p> <p><i>Amend sentence beneath 'Strategic development' to read:</i></p> <p>'Development will be supported at the following sites in accordance with the area strategies and that meet the requirements of the development plan including those set out in the development templates at appendix A.'</p> <p><i>Amend list of strategic development sites to include:</i></p> <p><u>'Local Plan allocations' and 'Vision Sites'</u></p> <p><i>Change reference to 'East Chippenham' to:</i></p> <p><u>'Rawlings Green, East Chippenham'</u></p>	<p>Adds clarity.</p> <p>Adds clarity.</p> <p>Adds clarity.</p> <p>Will give clarity to the sites which have been identified as sources of supply.</p> <p>Adds clarity.</p>
	Page 35, Core Policy 3, Para 3	<p><i>Amend paragraph to read:</i></p> <p><del>'All proposals for new development should be supported by an independent viability assessment. A viability assessment, undertaken by an independent third party but on terms agreed by the council and funded by the developer, will be required in the event of concerns that infrastructure requirements may render the development unviable. This will involve an 'open book' approach. If the</del></p>	<p>In response to representations.</p> <p>Not appropriate to request independent viability assessment for all development proposals.</p>

Ref'	DPD Ref'	Change	Reason
		viability assessment adequately demonstrates...'	
<b>Chapter 5 - Area Strategies (General comments)</b>			
	Pages 36-154, Community Area Strategy Core Policies, Delivery responsibility	<i>Add sentence to each to read:</i>  '...and town and parish councils through <u>community-led planning processes such as neighbourhood planning.</u> '	In response to representations received to recognise the role of neighbourhood planning in delivering the requirements set within the community area strategies.
	Pages 36-154, Community Area Strategy Core Policies which include AONB	<i>Amend 'The Strategy for the xxx Area' text to include the following:</i>  'The strategy will respond to the Community Area's location (in full or part) within a <u>nationally designated landscape. It will deliver, within the overall objective of conserving the designated landscape, a modest and sustainable level of development.</u> '	In response to representations.  Strengthens the objective to conserve the AONB.
<b>Amesbury Area Strategy</b>			
	Page 39, Para 5.15	<i>Amend paragraph to read:</i>  'The town is surrounded by an ancient landscape: it is close to the <del>Neolithic site of</del> <u>World Heritage Site of Stonehenge – a World Heritage Site (WHS), which attracts over a million visitors a year.</u> '	Clarity.
	Page 39, Para 5.19	<i>Amend final sentence of bullet 5 to read:</i>  'Wiltshire Council will work collaboratively with agencies, such as the Highways Agency, the Department of Transport and <u>English Heritage</u> to try and achieve an acceptable solution to the dualling of the A303 <u>that does not adversely affect the Stonehenge World Heritage Site and its setting.</u> '  <i>Bullet point 11 reword as:</i>  'An acceptable solution to the need for dualling the A303 is needed which must incorporate environmental measures to <u>avoid adverse impacts on the Stonehenge World Heritage Site. In 2007 the government identified a bored tunnel as the only acceptable solution to this.</u> '  <i>Bullet point 14 add words:</i>  'Development around Amesbury should be carefully designed so as not to <u>adversely</u> affect the Stonehenge World Heritage Site or its setting'	Minor amendments will bring clarity to the para.  Minor amendments will bring clarity to the para.  Minor amendments will bring clarity to the para.
	Page 43, Core Policy 4	<i>Amend small villages to read:</i>	Core Policy 4

Ref'	DPD Ref'	Change	Reason			
		'Gomeldon/ <u>East Gomeldon</u> '	identifies Gomeldon as a small village when in fact that 'The Gomeldons' comprise three settlements of Gomeldon, East Gomeldon and West Gomeldon.  This clarification will ensure the distinction between settlements.			
<b>Calne Area Strategy</b>						
	Page 55, Core policy 8	<p><i>Reinsert paragraph on the amount of employment to be identified and saved LP allocations as follows:</i></p> <p>Over the plan period, 6 hectares of employment will be provided, including:</p> <table border="1"> <tr> <td>Land East of Beversbrook Farm and Porte Marsh Industrial Estate</td> <td>Saved North Wiltshire District Plan Allocation</td> <td>3.2 hectares</td> </tr> </table>	Land East of Beversbrook Farm and Porte Marsh Industrial Estate	Saved North Wiltshire District Plan Allocation	3.2 hectares	Drafting error, omitted from the final pre-submission draft.
Land East of Beversbrook Farm and Porte Marsh Industrial Estate	Saved North Wiltshire District Plan Allocation	3.2 hectares				
<b>Chippenham Area Strategy</b>						
	Page 30, Core Policy 2, Strategic development, List of strategic sites	<p><i>Provide footnote to Table 5.4 (against 2,400 on strategic sites) to read:</i></p> <p><u>'Includes Land South West of Abbeyfield School (Landers Field).'</u></p>	Provides clarity.  The numbers on strategic sites at Chippenham are inconsistent between CP2 and Table 5.4. This is due to the exclusion of Landers Field from the Strategic development list in CP2.			
	Page 56, Para 5.47	<p><i>Add sentence to end of paragraph to read:</i></p> <p><u>'Proposed strategic housing and employment allocations to the south of Chippenham are to support the spatial strategy for Chippenham but are located within the Corsham community area.'</u></p>	For clarity No strategic sites at Corsham but there are strategic sites in the Corsham community area i.e. Chippenham sites.			
	Page 57, Para 5.48, Bullet Point 12	<p><i>Add following sentence to end of bullet point:</i></p> <p><u>'Contributions towards enhanced health and emergency services provision will be sought, where appropriate, from any proposed development at Chippenham, subject to viability and timing.'</u></p>	There are three strategic sites at Chippenham. It is not the case that each site will be expected to provide a site for new GP,			

Ref'	DPD Ref'	Change	Reason
		Amend following text of bullet point to read:  'A shared site <u>and/or contributions</u> '	Fire, Police and ambulance facilities.  Adds clarity.
	Page 60, Para 5.53	<i>Amend sentence to read:</i>  The council <del>will work with</del> is working with developers to ensure viable and comprehensive site solutions are delivered, which will secure investment in Chippenham.	To reflect on the work which is already taking place in Chippenham.
	Page 62, Figure 5.5, Chippenham Central Area of Opportunity	<i>Expand area of opportunity to include:</i>  'Cocklebury Road Campus'	Only viable option for college to deliver upgrade is to rationalise Cocklebury Road, release land for development and use receipt for reinvestment in the campus. College has an important role in driving the economy.
	Page 63, Core Policy 11	'Include <u>Grittleton</u> as a small village.'	Facilities and employment opportunities at the village support its designation as a small village.
<b>Corsham Area Strategy</b>			
	Page 65, Para 5.58	<i>Add sentence to end of paragraph to read:</i>  ' <u>Proposed strategic housing and employment allocations to the south of Chippenham are to support the spatial strategy for Chippenham but are located within the Corsham community area.</u> '	For clarity. No strategic sites at Corsham but there are strategic sites in the Corsham community area i.e. Chippenham sites.
	Page 67, Fig 5.6	<i>The indicative green spaces of the Chippenham strategic sites are missing and need to be added to be consistent with the other community area figures.</i>	For consistency and clarity.
<b>Melksham Area Strategy</b>			
	Page 85, Para 5.77	<i>Amend paragraph to read:</i>  'Community and health facilities in Melksham are under pressure, with most GP surgeries at capacity, <del>particularly to the west of the town.</del> '	To correct inaccuracy. There are no GP surgeries to the west of the town.
	Page 85, Para 5.79	<i>Specific change to text:</i>  A high level of residential development is already proposed in Melksham, including a planned urban extension to the east of the town, <u>on land identified in the West Wiltshire District Plan (2004).</u> This planned development will go some way towards addressing the future affordable housing need in the town.	To clarify that the reference to the planned development to the east is referring to a site which has already been identified, and is not implying that new greenfield sites to the east would be given preference.

Ref'	DPD Ref'	Change	Reason
	Page 86, Para 5.80, Bullet 6	<i>Amend bullet point to read:</i>  'But the town centre is in need of regeneration and the retail offer has suffered for a number of years. Community and health facilities in Melksham are under pressure, with most GP surgeries at capacity, particularly to the west of the town. <u>Developer contributions from future housing growth should help to deliver infrastructure necessary in the town. In particular, there is a need to increase the capacity of GP surgeries. Additional cemetery capacity is also needed</u> '	To emphasise the importance of securing adequate GP provision and additional cemetery capacity.
	Page 86, Para 5.80, Bullet 9	<i>Amend bullet point to read:</i>  'a need to improve public transport provision in the area has been identified including improving bus services; <u>improving the railway station and examining whether the frequency of rail services could be increased, and improving the railway station if more frequent services can be established</u> '	Improvement of the railway station is conditional upon an improved frequency of rail services. If there is no increase in frequency (currently two trains each way per day), then no improvement of the station could be justified.
	Page 88, Core Policy 15	'Include the village of <u>Great Hinton</u> in the list of Small Villages'	Local support, facilities and employment opportunities at the village support its designation as a small village.
	Page 89, Para 5.82	<i>Amend paragraph to read:</i>  'It also offers an opportunity to promote sustainable transport through the provision of walking and cycling routes, <u>including providing linkages between Semington and Berryfield and Melksham town centre.</u> '	To emphasise the particular opportunity for the canal to provide links between these villages and Melksham town centre.
<b>Mere Area Strategy</b>			
	Page 93, Figure 5.11	Amend map to remove the Principal Employment Area of:  ' <del>woodlands Industrial Estate</del> '	An error in the draft evidence was identified and this site is not a 'Principal Employment Area'.
	Page 94, Core Policy 17	<i>Amend text to read:</i>  ' <del>The following Principal Employment Area will be supported in accordance with CP35: Woodlands Industrial Estate</del> ' <u>'There are no Principal Employment Areas in the Mere Community Area'</u> .	An error in the draft evidence was identified and this site is not a 'Principal Employment Area'.
<b>Royal Wootton Bassett and Cricklade Area Strategy</b>			
	Page 99, Para 5.99, Bullet point 2	<i>Amend bullet point to read:</i>  '...deliver infrastructure necessary in the town	To make it clear what towns the text is referring to.

Ref'	DPD Ref'	Change	Reason
		<u>community</u> . In particular, improved pedestrian and cycle linkages are needed between the town centres of <u>Royal Wootton Bassett and Cricklade</u> and local community facilities; to include enhancements to the Cricklade Country Way and a cycle way between Royal Wootton Bassett and Windmill Hill Business Park. Other infrastructure priorities include the completion of a Wessex Water scheme to reduce flood risk to areas in Royal Wootton Bassett, the expansion or re-location of one or both of the existing GP surgeries in the Royal Wootton Bassett, and additional...'	
	Page 100, Para 5.99, Bullet point 10	<i>Amend last sentence to read:</i>  'These include Ballards' Ash Sports Hub, Cricklade Country Way and the restoration of the Wilts and Berks and Thames and Severn canals.'	Recognises the need to identify how improvements to the Thames and Severn canal can be delivered.
	Page 102, Fig 5.13	<i>Change marked route of Wilts and Berks canal:</i>  The canal does not stop at RWB as shown but goes on eastwards on its historic route to the boundary with Swindon Borough.	To improve accuracy of plan.
	Page 102, Figure 5.13	Improve clarity of map by making it clearer that the status of Bradenstoke is a 'Small village'.	To improve clarity of map.
	Page 104, Para 5.101	<i>Amend paragraph to read:</i>  '...future growth in Swindon should be considered holistically and with appropriate co-operation between neighbouring authorities and involve <u>collaborative working with the Wiltshire and Swindon Local Enterprise Partnership and the Wiltshire and Swindon Local Nature Partnership.</u> '	To acknowledge collaborative working and the Wiltshire and Swindon Local Nature Partnership.
<b>Salisbury Area Strategy</b>			
	Page 105, Para 5.109	Add bullet to list at paragraph 5.109 to read:  ' <u>transport solutions will be delivered in accordance with the emerging Salisbury Transport Strategy, and will support growth, as concluded through the Options Assessment Report, based on the radical option identified which would best enable Salisbury to meet the challenges of addressing future growth in travel demand in a sustainable manner</u> '	In response to representations. For consistency with the adopted South Wiltshire Core Strategy.
	Page 106, Para 5.109, Bullet point 8	<i>Amend bullet point to read:</i>  '...These will include <del>expansion of the fire station</del> <u>alterations to the Wiltshire Fire and Rescue Service infrastructure</u> to serve new development, and improvements to green infrastructure in the city.'	To add flexibility to the outcome.
	Page 110, Key projects map 5.115	<i>Amend first figure to read:</i>	To correct incorrect reference on map.

Ref'	DPD Ref'	Change	Reason
		'Longhedge 450 dwellings 8ha employment' replace with 'Hampton Park 500 dwellings 0 ha employment'.	
<b>Southern Wiltshire Area Strategy</b>			
	Page 118, Fig 5.16 and Page 119, Core Policy 24	<i>Amend figure and core policy:</i>  Add the parish of <u>Laverstock and Ford</u> to map and recognise in Core Policy 24 in list of villages.	To recognise the existence of Laverstock and Ford.
<b>Tidworth Area Strategy</b>			
	Page 122, Para 5.137, Bullet 4	<i>Amend bullet point to read:</i>  'In addition the fire and rescue service <u>would consider relocating the fire station within</u> <del>are considering relocating</del> Ludgershall fire station to Tidworth and additional facilities may be required.'	No reason to limit relocation.
<b>Trowbridge Area Strategy</b>			
	Page 130, Para 4.147, Bullet 5	<i>Amend bullet point to read:</i>  'there is a requirement to provide a <u>site for a</u> secondary school to the south east of Trowbridge...'	Clarification.
	Page 131, Para 5.147, Bullet point 8	<i>Add sentence at end of bullet to read:</i>  ' <u>The Assessment and relevant applications should optimise linkages providing permeable road, cycle and footpath connections between Ashton Park and the existing and committed improvements to the strategic road system at East Trowbridge.</u> '	Clarification.
	Page 132, Para 5.147 Bullet point 16	<i>Add sentence at end of bullet to read:</i>  ' <u>Flood mitigation should relate to development impact only.</u> '	Clarification.
	Page 133, Fig 5.19 and Page 262, Appendix A map, Ashton Park Urban Extension, South East of Trowbridge	<i>Amend maps to:</i>  Depict a slightly larger strategic site by the addition of an area of land between West Ashton Road and the River Biss within Ashton Park.	The incorporation of this area will allow optimal improvements to the River Biss Corridor and linkages to West Ashton Road and the new eastern distributor road system at Trowbridge.
	Page 133, Fig 5.19	<i>Amend map to show:</i>  'Significant permissions at Green and East of Paxcroft Mead. Show Hilperton Gap relief road which will be completed during the first part of the plan period.'	Up to date position and clarification.
	Page 135, Fig 5.20	Remove areas 7,12 and 17 and their descriptions, the part of area 11 south east of road, and the River Biss corridor (marked green). Renumber accordingly.	To reflect up-to-date situation / clarity.
	Page 134, Para 5.150	<i>Insert new wording at the end of paragraph to</i>	In response to

Ref'	DPD Ref'	Change	Reason
		<p><i>read:</i></p> <p><u>'Where it is clearly demonstrated, through an open book approach, and agreed by the local planning authority that the uses proposed in the Masterplan are not viable, alternative uses may be supported where they are consistent with the objective of securing a sustainable mix of uses for the Regeneration Area as a whole and would not be to the detriment of the delivery of other sites.'</u></p>	representations received and to add flexibility to approach.
<b>Warminster Area Strategy</b>			
	Page 142, Para 5.153	<p>Amend paragraph to read:</p> <p><u>'...Cardiff to Portsmouth railway line. The town has strong functional linkages for employment and shopping with Frome. Warminster has been identified...'</u></p>	Recognises the relationship of Frome to the west Wiltshire towns.
<b>Westbury Area Strategy</b>			
	Page 148, Para 5.162	<p><i>Amend paragraph to read:</i></p> <p><u>'Overall, the town should not seek to compete with the larger nearby centres, including Frome, but rather consolidate...'</u></p>	Recognises the relationship of Frome to the west Wiltshire towns.
	Page 149, Para 5.163, Bullet point 9	<p><i>Amend bullet to read:</i></p> <p><u>'...pressure upon the Special Protection Area will not be permitted unless proportionate developer contributions are made to offset impacts through the Wessex Stone Curlew Project.'</u></p>	To add clarity.
	Page 149, Para 5.163, Bullet point 10	<p><i>Add a 5<sup>th</sup> point to list to read:</i></p> <p><u>'V. The rail connection to the former Lafarge site should be retained.'</u></p>	<p>Consistent with policy Core Policy 65 Movement of Goods.</p> <p>Rail sidings at former Imerys Quarry, Salisbury are being retained.</p>
<b>Chapter 6 – Core Policies</b>			
<b>Core Policy 34 – Additional employment land</b>			
	Page 161, Core Policy 34	<p><i>Amend i. to read:</i></p> <p><u>'are on the edge of these settlements that seek to retain or expand businesses currently located within or adjacent to the settlements identified in Core Policy 1'</u></p>	Improve clarification and consistency with Core Policy 2 as defined in Para 6.13.
<b>Core Policy 35 – Existing employment sites</b>			
	Page 163, Core Policy 35, Para 1	<p><i>Amend paragraph to read:</i></p> <p><u>'Wiltshire's Principal Employment Areas (as listed in the Area Strategies) <del>will</del> should be retained for employment purposes within use classes B1, B2 and B8 to safeguard their contribution to the Wiltshire economy and the role and function of individual towns. Proposals for renewal and intensification of the above employment uses within these</u></p>	In order to make the policy more flexible with respect to the Principal Employment Areas.



Ref'	DPD Ref'	Change	Reason
		areas will be supported <u>and any change of use away from B1, B2 and B8 uses will be considered in line with the following criteria.</u>	
	Page 163, Core Policy 35, Para 2	<i>Amend paragraph to read:</i>  ' <u>Elsewhere Within the principal settlements, market towns, local service centres and Principal Employment Area's proposals...</u> '	In order to make the policy more flexible with respect to the Principal Employment Areas.
	Page 163, Core Policy 35, Para 2	<i>Amend paragraph to read:</i>  '...classes B1, B2 and B8 must demonstrate that they meet <u>and will be assessed against</u> <del>s</del> <u>at least one of the following criteria...</u> '	Clarity.
<b>Core Policy 38 – Retail and leisure</b>			
	Page 166, Para 6.27	<i>Amend paragraph to read:</i>  '... assessment of impacts on centres. However, <u>evidence has identified that a succession of planning applications.....</u> '.  Footnote to be added after 'evidence' to read:  ' <u>Wiltshire Council, Town Centre and Retail Study, GVA Grimley, page 201, para 9.3 and 9.4</u> '	To ensure it is clear that the requirement is based on comprehensive qualitative and quantitative evidence.
<b>Core Policy 40 – Hotels</b>			
	Page 169, Core Policy 40, Para 1	<i>Amend paragraph to read:</i>  'Proposals for new hotels, bed and breakfasts, guesthouses or conference facilities, <u>together with the sensitive extension, upgrading and intensification of existing tourism accommodation facilities</u> within the Principal Settlements and Market Towns will be supported '.	To make it clear that the policy also relates to extension / upgrading and intensification in the principal settlements and market towns.
<b>Core Policy 41 – Climate change</b>			
	Page 170, Core Policy 41, Para 6.33	<i>Amend paragraph to read:</i>  'The government has pledged to reduce the UK's total carbon emissions by at least 34% by 2020, <u>and by at least 80% by 2050, relative to 1990 levels. The government has also pledged</u> for 15% of energy to be derived from renewable sources by 2020".  [Keep footnote as presented within pre-submission draft].	Plan period goes beyond 2020 so reference to 2050 target is considered appropriate.
<b>Core Policy 42: Standalone renewable energy installations</b>			
	Page 174, Para 6.37	<i>Add following sentence at end of paragraph:</i>  ' <u>It should also be noted that some renewable energy technologies require additional permissions over and above planning, such as abstraction licenses, flood defence consents and environmental permits</u> '.	For clarification. Supporting text is considered more appropriate place for this text, rather than policy.
	Page 175, Core Policy 42	<i>Add new criterion viii:</i>  ' <u>best and most versatile agricultural land.</u> '	To ensure that potential impacts on best and most versatile agricultural

Ref'	DPD Ref'	Change	Reason
		<i>Remove 'and' from end of criterion vi and remove full stop and insert 'and' at end of criterion vii.</i>	land are taken into account.
<b>Core Policy 43 – Affordable Housing</b>			
	Page 175, Para 6.39	<i>Amend paragraph to read:</i>  'Core Policy 2 identifies the requirement for <u>at least 37,000 new homes to be provided over the plan period including affordable homes.</u> '	Consistency.
<b>Core Policy 47 – Gypsies and travellers</b>			
	Page 183, Para 6.57	<i>Amend paragraph to read:</i>  ' <u>In March 2012 the government published the National Planning Policy Framework and 'Planning Policy for Travellers'. These documents</u> <del>In 2011, the government published a draft Planning Policy Statement on planning for traveller sites</del> which includes the general principle of aligning planning policy for travellers more closely with other forms of housing. It <del>also</del> requires the council to demonstrate a five year supply of pitches against a long term target based on clear evidence (See Appendix C). Core policy 47 reflects this approach by introducing a set of criteria <u>which define broad locations where sites would be appropriate and</u> against which potential sites will be tested. The policy identifies a specific requirement for new pitches to 2021. The criteria...'  <i>Add footnote to signpost new guidance to replace footnote 60.</i>	Update to reflect publication of the NPPF and Planning Policy for Travellers.
	Page 185, Core Policy 47	<i>Split criterion iii by dividing into two points to read:</i>  <u>iii the site can be properly serviced and is supplied with essential services, such as water, power, sewerage and drainage, and waste disposal.</u>  <u>iv The site must also be large enough to provide adequate vehicle parking, including circulation space, along with residential amenity and play areas</u>  <i>Amend criteria iv to read:</i>  '...schools and essential health services. <del>This will be defined in detail in the methodology outlined in the Site Allocations DPD, and...</del> '  Change criterion <del>iv</del> to <u>v</u> . Change criterion <del>v</del> to <u>vi</u> .  <i>Add additional criterion to bottom of criteria as follows:</i>  ' <u>vii adequate levels of privacy should be</u>	For consistency with adopted S Wilts Core Strategy and for better consistency with new national policy.  General point of consistency with SWCS raised by a number of respondents  Implementation of policy should not be left to a subsequent document.

Ref'	DPD Ref'	Change	Reason
		<p><u>provided for occupiers.'</u></p> <p><i>and</i></p> <p><u>'viii development of the site should be appropriate to the scale and character of its surroundings and existing nearby settlement.</u></p> <p><u>ix The site should not compromise a nationally or internationally recognised designation nor have the potential for adverse effects on river quality, biodiversity or archaeology.'</u></p>	
	Page 186, Core Policy 47, monitoring and review section of policy	<p><i>Amend so sentence reads:</i></p> <p>'Number of <u>permanent and transit</u> Gypsy and Traveller pitches <u>and Travelling show people plots</u> to be monitored through the Wiltshire Monitoring Framework.'</p>	For clarity.
<b>Core Policy 48 – Supporting rural life</b>			
	Page 186, Para 6.60	<p><i>Add to bulleted list:</i></p> <p><u>'provision of meeting halls and places of worship'</u></p>	Provision of meeting halls and places of worship will help build resilient communities.
	Page 187, Para 6.63	<p><i>Amend paragraph to read:</i></p> <p>'Proposals to convert redundant buildings for employment, tourism or residential uses, <u>community uses, meeting rooms or places of worship</u> will need to fulfil the requirements set out in Core Policy 48.'</p>	To recognise community uses, meeting rooms and places of worship as conversion opportunities.
	Page 188, Core Policy 48, Para 1	<p><i>Add additional sentence at the end of Para 1 as follows:</i></p> <p><u>'Proposals for accommodation to meet the needs of employment essential to the countryside should be supported by functional and financial evidence to support the application.'</u></p>	Provides a mechanism to ensure that development delivered through this policy is essential.
	Page 188, Core Policy 48	<p><i>Amend sentence after heading 'Reuse of redundant agricultural buildings' to read:</i></p> <p>'Proposals to convert redundant <del>agricultural</del> buildings for employment, <u>tourism, cultural and community uses</u> will be supported where it satisfies the following criteria...'</p>	Widens the opportunity to utilise the appropriate use of redundant agricultural buildings – and accords with national planning policy framework provisions.
<b>Core Policy 50 – Biodiversity</b>			
	Page 191, Para 6.71	<p><i>Amend paragraph to read:</i></p> <p><u>'...particularly valuable where it contributes towards <del>landscape scale projects</del> Nature Improvement Areas or other landscape scale projects identified by Local Nature Partnerships.</u></p>	NIA's and LNPs have recently been given status in planning through the NPPF. Also provides useful clarity on the term 'landscape scale projects'.

Ref'	DPD Ref'	Change	Reason
<b>Core Policy 51 – Landscape</b>			
	Page 195, Para 6.77	<i>Add to last sentence of Para 6.77 to read:</i>  'Development affecting Stonehenge and Avebury World heritage Site and its setting should be considered in light of Core Policy 59, <u>while any development in the setting of the Bath World Heritage Site should have regard to the findings of the Bath World heritage Site Setting Study (2009) and any associated Supplementary Planning Document as a material planning consideration.</u> '	The cross-boundary effects of development in Wiltshire on the setting of the Bath WHS have only recently come to light through discussions.
	Page 196, Core Policy 51, Para 1	<i>Amend last sentence to read:</i>  'In particular, proposals will need to demonstrate that the following aspects of landscape character have been <del>considered</del> <u>conserved</u> and where possible enhanced.'	The term 'considered' does not require the applicant to do anything.
<b>Core Policy 52 – Green Infrastructure</b>			
	Page 199, Core Policy 52, Para 1, Bullet point 5	<i>Amend bullet point to read:</i>  ' <u>identify and provide</u> opportunities to enhance and improve linkages between the natural and historic landscapes of Wiltshire'	Previous wording did not require the applicant to do anything.
<b>Core Policy 53 – Wilts and Berks and Thames and Severn canals</b>			
	Page 200, Para 6.96	<i>Add sentence at end of paragraph to read:</i>  ' <u>The use of SUDS should be encouraged wherever possible, unless this could risk groundwater resources through infiltration.</u> '	Possible risk to groundwater from canals due to poor water quality.
	Page 200, Para 6.98	<i>Amend paragraph to read:</i>  'The Kennet and Avon Canal is a significant asset within Wiltshire's <u>sustainable transport and green infrastructure network...</u> '	Need to recognise the K&A's function as a sustainable transport route.
<b>Core Policy 55 – Air Quality</b>			
	Page 204, Core Policy 55	<i>Add criteria to policy:</i>  ' <u>Where appropriate contributions will be sought toward the mitigation of the impact a development may have on levels of air pollutants.</u> '	This should be a tool highlighted in the policy.
<b>Core Policy 57- Design and place shaping</b>			
	Page 207, Para 6.126	<i>Add following text to end of Para 6.126:</i>  ' <u>this includes Village Design Statements that are up to date and approved by the local authority as providing guidance on the implementation of policy CP57 for a local area.</u> '	Responds to issues raised in rural workshops. Recognises status of VDS.
	Page 209, Core Policy 57, Criteria ix	<i>Amend criterion to read:</i>  'Are designed to create places of character which are legible, <u>safe</u> and accessible.'	Road safety for small scale developments not included elsewhere in the plan.
	Page 209, Core Policy 57, Criterion xii	<i>Amend criterion to read:</i>	Minor amendments will bring clarity to

Ref'	DPD Ref'	Change	Reason
		'the use of high standards of building materials, finishes and landscaping, including the provision of street furniture <u>and the integration of art and design in the public realm.</u> '	the policy.
<b>Core Policy 58 – Conservation of the built Environment</b>			
	Page 209, Para 6.130	<i>Add footnote to 6.130 to read:</i>  'The policy recognises that the setting of the Bath World Heritage site may include <u>elements within Wiltshire. Wiltshire council will work with Bath and North East Somerset Council to develop guidance on how the outstanding universal value of this world heritage site should be protected.</u> '	Core strategy needs to recognise that the council will work with Bath to protect this international heritage asset.
	Page 211, Core Policy 58, Para 2	<i>Amend criteria to read:</i>  i. archaeological remains <del>and their setting</del> ii. the World Heritage Site iii. buildings and structures of special architectural or historic interest <del>and their settings</del> iv. the special character or appearance of conservation areas <del>and their settings</del> v. historic parks and gardens <del>and their setting</del>	Minor amendments will bring clarity to the policy.
	Page 211, Core Policy 58, Para 2	<i>Amend criterion vi to read:</i>  'important landscapes, <u>including registered battlefields and townscapes.</u> '	To recognise importance of registered battlefields.
	Page 211, Core Policy 58	<i>Add following text to 'monitoring and review':</i>  'Where appropriate at risk surveys will be <u>carried undertaken to ensure there is an understanding of what is at risk.</u> '	Response to statutory response.
	Page 211, Core Policy 58, Criteria ii)	<i>Amend criteria to read:</i>  'World Heritage Sites <u>within and adjacent to Wiltshire</u> '	To recognise Bath WHS setting includes elements of Wiltshire.
<b>Core Policy 59 – World Heritage Site</b>			
	Page 201, Core Policy 53	<i>Amend CP53, fourth paragraph to read:</i>  'Proposals for the reinstatement of canal along these historic alignments <u>or any alternative alignments</u> will need to demonstrate that the cultural, historical and natural environment will be protected...'	Alternative alignments could also have environmental impacts which will need to be considered.
	Page 212, Para 6.137	<i>Amend Para 6.1.37 to read:</i>  'Wiltshire's World Heritage Site (WHS)... <u>present and transmit to future generations its WHS which, because of their exceptional qualities are considered to be of Outstanding Universal Value (OUV).....decisions concerning development management in the WHS. ....sensitive management in order to protect the Site and sustain its OUV.</u> '	Minor amendments more closely reflect the obligations under the UNESCO World Heritage Convention (1972)
	Page 211, Core Policy 58, Para 4	<i>Amend paragraph to read:</i>	Minor amendments will bring clarity to

Ref'	DPD Ref'	Change	Reason
		'...benefits will be exploited, <u>where appropriate and in a sensitive manner, including.</u> '	the paragraph.
	Page 212, Para 6.138	<i>Amend paragraph to read:</i>  " <del>... comprising its significance, authenticity and integrity.</del> <u>Since that time, a Statement of Significance (see Stonehenge Management Plan, 2009, pp. 26-27) and a Draft Statement of OUV for the WHS have been drawn up. The World Heritage Site requires protection and where appropriate enhancement in order to preserve its OUV. The UNESCO Statement of Significance and Draft Statement of OUV ...for identification of the attributes of OUV, as well as other important aspects of the WHS, and for reaching decisions on the effective protection and management of the Site.</u> "□	Adds clarity and accuracy
	Page 212, Para 6.139	<i>Amend paragraph to read:</i>  'mortuary practices through 2,000 years...Their careful <u>design</u> in relation...'	Minor amendments for accuracy
	Page 212, Para 6.140	<i>Amend paragraph to read:</i>  Sentence 1: <u>...impact on the Site and its attributes of OUV.</u>  Sentence 5: <u>...impact on the WHS and its attributes of OUV.</u>	For clarity
	Page 212, Para 6.141	<i>Amend paragraph to read:</i>  4th sentence " <u>... management of the site in order to sustain its OUV, taking into account....</u> "	For consistency
	Page 213, Para 6.142	<i>Amend paragraph to read:</i>  Second sentence: <u>....no adverse effect upon the Site and its attributes of OUV.</u>	For consistency
	Page 213, Para 6.143	<i>Amend paragraph to read:</i>  last sentence: <u>...to assess impact on the WHS and its attributes of OUV.</u>	For consistency
	Page 213, Para 6.144	<i>Amend paragraph to read:</i>  " <u>...protecting and enhancing the World Heritage Site and its setting in order to sustain its OUV....This will include considering the use of further Article 4 Directions ....adverse effect on the WHS and its attributes of OUV.</u>	For consistency
	Page 214, CP59	<i>Amend policy to read:</i>  The Stonehenge, Avebury and Associated Sites World Heritage Site  The Outstanding Universal Value (OUV) of the World Heritage Site <del>and its setting</del> will be protected and enhanced by:	Minor amendments to the policy will clarify that the setting contributes to OUV but is not of

Ref'	DPD Ref'	Change	Reason
		<p>i. giving precedence to the protection of the <del>OUV of the</del> World Heritage Site and its setting</p> <p>ii. development not adversely affecting the <del>OUV of the</del> World Heritage Site <u>and its attributes of OUV significance, authenticity, or integrity, or its setting</u>. This includes the physical fabric, character and appearance, setting or views into or out of the World Heritage Site</p> <p>iii. seeking opportunities to support and <del>sustain</del> <u>maintain</u> the positive management of the <del>OUV of the</del> World Heritage Site through development that delivers improved conservation, presentation and interpretation and reduces the negative impacts of <u>roads</u>, traffic and visitor pressure</p> <p>iv. requiring developments to demonstrate that full account has been taken of their impact upon the <del>OUV of the</del> World Heritage Site and its setting. Proposals will need to demonstrate that the development will have no individual, cumulative or consequential adverse effect upon the <u>Site and its</u> OUV. This will include proposals for climate change mitigation and renewable energy schemes.</p> <p>Consideration of opportunities for enhancing the <del>OUV World Heritage Site and its attributes of OUV</del> should also be demonstrated.</p>	<p>OUV itself.</p> <p>It will add clarity by removal of specialised UNESCO terminology</p> <p>It is not only the traffic which causes the negative impact but the roads and associated clutter. This reflects the World Heritage Site Management Plans and SOUV.</p> <p>Change order of sentences. In response to representations to clarify meaning. As drafted, it could be interpreted to mean that the enhancement issue is referring to renewable energy only.</p>
<b>Core Policy 60 – Sustainable transport</b>			
	Page 215, Core Policy 60, Para 1 and final paragraph	<p><i>Amend paragraph to read:</i></p> <p>'...to help reduce the need to travel <u>particularly by private car</u>'</p> <p><i>Delete final paragraph from Core Policy 60 and insert as supporting text at the end of Paragraph 6.146.</i></p>	To clarify meaning and correct drafting error.
<b>Core Policy 61 – Transport and development</b>			
	Page 216, Core Policy 61, Para 1	<p><i>Amend paragraph to read:</i></p> <p>'...to help reduce the need to travel, <u>particularly by private car.</u>'</p>	To clarify meaning.
<b>Core Policy 63 – Transport strategies</b>			
	Page 218, Core Policy 63	<p><i>Amend criterion (vi), as follows:</i></p> <p>'interchange enhancements that are <u>safe</u> and accessible by all'</p>	To correct drafting error.
<b>Core Policy 65 – Movement of goods</b>			
	Page 221, Paragraph 6.163	<p><i>Insert wording at the end of paragraph as follows:</i></p> <p>'Further details on the council's approach to</p>	In the interests of clarification.

Ref'	DPD Ref'	Change	Reason
		freight management are contained in the <u>Wiltshire Local Transport Plan 2011-2016 Freight Strategy.</u>	
<b>Core Policy 66 – Strategic transport network</b>			
	Page 222, Paragraph 6.168	<p><i>Insert new paragraph after Paragraph 6.168, as follows:</i></p> <p><u>'The strategic transport network is made up of the following:</u></p> <p><u>(1) The national primary route network (including the strategic road network):</u></p> <p><u>Strategic Road Network - M4, A303, A36, A419</u>  <u>Primary Route Network - A4 (west of Chippenham), A30 (St. Thomas's Bridge to Salisbury), A338 (south of Burbage), A346 (M4 junction to Burbage), A350, A354, A361 (west of Semington), A429.</u></p> <p><u>(2) The strategic advisory freight route network – M4, A303, A350, A36, A419, A34 (east of Wiltshire).</u></p> <p><u>(3) The strategic bus network: services linking the towns and larger villages with each other and with higher order centres, or providing them with access to the rail network if they do not have a rail station.</u></p> <p><u>(4) The rail network:</u></p> <p><u>Berks &amp; Hants Line (London - South West England via Westbury)</u>  <u>Greater Western Main Line (London - Bristol/South Wales)</u>  <u>Heart of Wessex Line (Bristol - Weymouth)</u>  <u>Waterloo-Exeter Line</u>  <u>Wessex Main Line (Cardiff - Portsmouth)</u>  <u>Westbury-Swindon Line (via Melksham)'</u></p>	In the interests of clarification.
	Page 223, Core Policy 66	<p><i>Make the following changes to policy:</i></p> <p><i>Insert footnote to clarify that the bus network is not shown on the key diagram.</i></p>	In the interests of clarification.



Ref'	DPD Ref'	Change	Reason
		<p>Insert '<u>neighbouring authorities</u>' before other agencies in first sentence of policy.</p> <p>Insert '(including the strategic road network)' after 'the national primary route network' in point (1).</p> <p>Reword point (3) as follows:</p> <p>'The <u>strategic key bus network route</u>.'</p> <p>Amend first paragraph:</p> <p>Replace 'assist employment' with '<u>support development</u>'.</p> <p>Insert paragraph at end of policy to read:</p> <p>"<u>The land required for these and other realistic proposals on the strategic transport network which support the objectives and policies in the core strategy and local transport plan will be protected from inappropriate development.</u>"</p>	
<b>Core Policy 68 – Water Resources</b>			
	Page 224, Para 6.173	<p>Amend Para. 6.173 Second sentence to read:</p> <p>'Three River Basin Management Plans have been prepared to meet the requirements of the Water Framework Directive for Wiltshire and surrounding areas; namely the Severn, South West and Thames River Basin Management Plans. <u>In addition, a number of Catchment Management Plans are currently in preparation and will provide relevant targets and actions at a local level.</u>'</p>	EA have recently announced the development of River Catchment Management Plans, which will provide greater levels of detailed action for delivery of WFD targets at a local level.
	Page 225, Core Policy 68, Para 1	<p>Amend first paragraph to read:</p> <p>'Development must not prejudice the delivery of the actions and targets of the relevant River Basin or <u>Catchment Management Plan</u>, and should contribute to their plan where possible'.</p>	EA have recently announced the development of River Catchment Management Plans, which will provide greater levels of detailed action for delivery of WFD targets at a local level.
	Page 225, Para 6.176	<p>Amend paragraph to read:</p> <p>'Development <u>within the catchment in close proximity to the river</u> has the potential to have a detrimental effect upon its qualifying features...'</p>	To appropriately reference the fact that development within the River Avon Catchment has the potential to present adverse impacts.
<b>Development templates for strategic allocations</b>			

Ref'	DPD Ref'	Change	Reason
	<b>Land at Kingston Farm, Bradford-on-Avon</b>		
	Page 236, Heading	<p><i>Add generic text under heading 'Appendix A: Development templates for strategic allocations'</i></p> <p><u>'The requirements in these development templates are sought to serve the proposed development and mitigate any associated impact of the development.'</u></p>	
	Page 236, Land at Kingston Farm, Bradford on Avon development template	<p><i>Under 'Key Objectives' amend 4<sup>th</sup> bullet to read:</i></p> <p><del>'To facilitate the retention and expansion of an existing two local employers, already located in close proximity to the site'</del> To facilitate the retention and expansion of two local employers already located in close proximity to the site.</p>	For accuracy
	Page 237, Land at Kingston Farm, Bradford on Avon development template	<p><i>Under 'transport', amend bullet 1 to:</i></p> <p><u>'Appropriate public transport, walking and cycling links should be provided to the town centre. This should include provision of a safe pedestrian/cycling route avoiding the B3107 (from the Cemetery through to the Springfield/Holt Road junction followed by an upgraded pedestrian link to the town centre).'</u></p>	For clarity
	Page 237, Land at Kingston Farm, Bradford on Avon development template	<p><i>Under 'Social and Community' amend 5<sup>th</sup> bullet to read:</i></p> <p><u>'Financial contributions required towards the extension of the existing cemetery, or additional land in the masterplan will be provided considered for an expansion to of the existing cemetery, either as a conventional cemetery, or as a possible 'green/woodland' cemetery. A footpath link to the cemetery should be considered.'</u></p>	For clarity
	Page 237, 'Physical Requirements' section within Bradford on Avon development template	<p><i>Reword 'Physical Requirements' section as follows:</i></p> <p><b>Physical Requirements</b></p> <ul style="list-style-type: none"> <li><del>Development will require up-sizing of sewers through the town, construction of on-site sewers and improvements will be required to the downstream network.</del></li> <li><del>Dedicated pumping stations and rail and river crossings to the sewage treatment works (which is to the west of the site) would be required.</del></li> <li>Development will require on-site water mains. Financial contribution will depend upon phasing, layout and minor off-site improvements.</li> <li><u>Foul and surface water drainage from the site will need to be adequately addressed. The developer is</u></li> </ul>	To reflect updated information from Wessex Water and the promoters of the site.

Ref'	DPD Ref'	Change	Reason
		<p><u>investigating the possibility of a 'living water' sustainable drainage system which could address both foul and/or surface water drainage from the site as an alternative to a conventional system.</u></p> <ul style="list-style-type: none"> <li>• <u>Wessex Water in conjunction with Wiltshire Highways have investigated and modelled the adjacent foul and surface water systems in pursuit of a more conventional solution. The modelling confirms what route and associated amendments to their systems these require. The results of the study show that it is possible to mitigate some downstream issues by removing surface water from the foul system and redirecting back into a surface water system that has adequate capacity. Following this a conclusion will be made about which option will be pursued. This provides for a more sustainable solution over disruptive and extensive upsizing options for downstream sewers.</u></li> <li>• <u>Improvements to the Springfield pump station are required and an option study is required to agree these improvements.</u></li> <li>• <del>A financial contribution will be required for off-site works to mitigate against the impact of this development to reduce the risk of downstream sewer flooding, and increased risk of overflow spills.</del></li> <li>• <del>The developer is investigating the possibility of a 'living water' sustainable drainage system which could address both foul and surface water drainage from the site. They have also indicated that it has been agreed that Wessex Water will model two foul systems as a more conventional solution. The modelling will confirm what route and associated amendments to their systems these may require.</del></li> <li>• <del>Following this a conclusion will be made about which option will be pursued.</del></li> </ul>	
	Page 238, Land at Kingston Farm, Bradford on Avon, development template	<p><i>Under 'Green Infrastructure' add an additional bullet:</i></p> <p>'There are a number of large trees on the site that should be maintained and masterplanned into the proposed development'.</p>	This is considered to be a valid point, and reference to the large trees would be appropriate in the development template.
<b>North Chippenham Strategic Site</b>			
	Page 240, North	<i>Amend map to show extent of the strategic</i>	Clarification of site

Ref'	DPD Ref'	Change	Reason
	Chippenham strategic site development template	<i>site that reflects the site which is the subject of a current planning application.</i>	boundaries.
	Page 242, North Chippenham Strategic Site development template.	<p><i>Under 'Landscape' amend as follows:</i></p> <p><i>Amend bullet 1 to read:</i></p> <p>'Employment provision on the west of the site will form a gateway to the town and should be of <del>outstanding</del> <u>high quality design</u>, incorporating.....'</p> <p><i>Amend 4<sup>th</sup> bullet to read:</i></p> <p>'The required road link <del>between the proposed development and Bird's Marsh Wood</del> shall be appropriately mitigated in landscape and visual terms'.</p>	Clarification. Current wording is unquantifiable.
<b>Rawlings Green, East Chippenham Strategic Site</b>			
	Page 244, Rawlings Green, East Chippenham development template	<p><i>Amend 'Use' to read:</i></p> <p>'6 hectares of employment land, 700 houses, community facilities <u>and open space</u>'.</p>	To better reflect the emerging development proposals.
	Page 244, Rawlings Green, East Chippenham development template	<p><i>Amend bullet 1 under 'Key Objectives' to read:</i></p> <p>'To deliver a sustainable urban extension containing 6 ha of employment land, 700 dwellings, community facilities and <u>open space</u> which will contribute to improving the critical mass of the town thereby supporting improved services and helping to deliver enhances infrastructure.'</p>	To better reflect the emerging development proposals.
	Page 245, Rawlings Green, East Chippenham development template	<p><i>Under 'Physical Requirements':</i></p> <p><i>Amend bullet 1 to read:</i></p> <p>'A drainage strategy is required, to be agreed with Wessex Water or the <u>appropriate drainage body</u>. Where network modelling is required, financial contributions will be sought to cover additional appraisal and survey costs. The developer will be responsible for the construction of the on-site drainage <u>infrastructure</u> to the <u>appropriate standard</u>.'</p> <p><i>Amend bullet 2 to read:</i></p> <p>'Financial contribution required for off-site works to mitigate against the effect of this <u>proposed development</u> and reduce the risk of <u>off-site or downstream sewer flooding</u>. Development should not precede necessary off-site works, <u>unless it can be satisfactorily demonstrated that phase will not result in off-site or downstream</u></p>	To provide more clarification to improve effectiveness of requirements. To give greater precision and to include policy test in terms of viability, technical and practical considerations.

Ref'	DPD Ref'	Change	Reason
		<p><u>sewer flooding.</u>'</p> <p><i>Amend bullet 3 to read:</i></p> <p>'Wessex Water advises the developer to provide on-site mains <u>water</u> under Section 41 requisition arrangements. It is predicted that a local connection will not be available and network modelling <u>will be required to confirm the extent of any off-site reinforcement necessary to serve the development.</u> Development of a particular phase should not proceed <u>unless that phase can be adequately supplied with mains water.</u></p> <p><u>A sustainable drainage scheme will be provided to an appropriate standard and arrangements for its long term operation will be agreed.</u>'</p> <p><i>Amend bullet 5 to read:</i></p> <p>'A SFRA Level 2 assessment will be required to ensure that the proposed development <u>including associated infrastructure does not unacceptably encroach</u> within the flood zone and to inform the sequential test'.</p> <p><i>Amend Bullet 6 as follows:</i></p> <p>'Proposed <u>development types</u> will need to recognise <u>and address</u> the development vulnerability of the area i.e. Groundwater Source Protection Zone 2.'</p> <p><i>Amend bullet 7 as follows:</i></p> <p>'<u>Overhead power lines</u> cross the site. <u>These should be placed underground subject to viability, technical and practical considerations.</u> Alternatively, in order to minimise costs, wherever possible, existing overhead <u>power lines</u> can remain in place with uses, such as open space, parking, garages or public highways generally being permitted in proximity to the overhead lines. Where this is not practical, or where developers choose to lay out their proposals otherwise, then agreement will be needed as to how <u>the power cables</u> will be dealt with, including agreeing costs and identifying suitable alternative routing for the circuits.'</p>	

Ref'	DPD Ref'	Change	Reason
	Page 245, Rawlings Green, East Chippenham development template	<p><i>Under 'Transport':</i></p> <p><i>Amend bullet point 1 to read:</i></p> <ul style="list-style-type: none"> <li>• Provision of <u>and/ or contributions towards the transport infrastructure, required to serve the development in line with the Chippenham Transport Strategy, where relevant.</u></li> </ul> <p><i>Amend bullet point 2 to read:</i></p> <ul style="list-style-type: none"> <li>• Development is required to deliver a road link/ <u>connection</u> across the railway in conjunction with North Chippenham <u>and enhancements to Cocklebury Road, necessary to serve the development.</u></li> <li>• The proposed development will provide, <u>and/or contribute towards,</u> improvements to public transport connectivity and pedestrian and cycling links between the town centre, railway station and Wiltshire College campuses, with improved pedestrian and cycle access along the River Avon corridor, <del>are required.</del></li> </ul> <p><i>Amend bullet point 3 to read:</i></p> <ul style="list-style-type: none"> <li>• Improvements to public transport connectivity and pedestrian and cycling links between the town centre, railway station and Wiltshire College campuses, with improved pedestrian and cycle access along the River Avon corridor, are required. Improvements to the local Rights of Way network <u>will be included within the proposed development and/ or off-site contributions towards relevant improvements will be required as identified in the IDP.</u></li> </ul>	To provide more clarification to improve effectiveness of requirements.
	Page 245, Rawlings Green, East Chippenham development template	<p><i>Under 'social and community':</i></p> <p><i>Amend bullet 3 to read:</i></p> <p><u>'The proposed development will include New facilities and/ or an off site financial contributions, necessary to serve the development and subject to overall viability and timing, for police, fire, ambulance and GP uses are required. A shared site should be considered.</u></p> <p><i>Amend bullet 6 to read:</i></p> <p><u>'Provision of and/ or financial contributions, subject to overall viability and timing, for children's play, accessible natural green space, allotments, a community orchard, and a skate park is required.</u></p>	To provide more clarification to improve effectiveness of requirements.

Ref'	DPD Ref'	Change	Reason
	Page 246, Rawlings Green, East Chippenham development template	<p><i>Under 'Green Infrastructure':</i></p> <p><i>Amend bullet 1 to read:</i></p> <ul style="list-style-type: none"> <li>Public footpath CHIP43 should be carefully incorporated into the scheme, <u>or suitably diverted if necessary</u>, to ensure <u>that</u> this green link between the town and countryside is maintained.</li> </ul> <p><i>Amend bullet 2 to read:</i></p> <ul style="list-style-type: none"> <li><u>A Riverside Park is to be provided at Rawlings Green. Riverside access will be extended alongside the site from Monkton Park (Riverside Drive) linking with LBUR1 and link to the wider countryside to the north.</u></li> </ul> <p><i>Amend bullet 3 to read:</i></p> <ul style="list-style-type: none"> <li>Provision for children's play, accessible natural green space, sports and allotments to be made to <u>the relevant national or Wiltshire standards.</u></li> </ul> <p><i>Amend bullet 4 to read:</i></p> <ul style="list-style-type: none"> <li>Development of <u>the Riverside Park and other structural public open space a country park</u> will require <u>a long term management plan and an appropriate funding mechanism</u> to implement a long term management plan.</li> </ul>	To provide more clarification to improve effectiveness of requirements.
	Page 246, Rawlings Green, East Chippenham development template	<p><i>Under 'Ecology':</i></p> <p><i>Amend bullet 1 as follows:</i></p> <p>Surveys <u>will be</u> required for habitats, bats, reptiles, breeding/ wintering birds, invertebrates, Great Crested Newts and Dormouse. <u>The Rawlings Green development should include suitable ecological with mitigation, as necessary.'</u></p>	Clarification of requirements for site.
	Page 244, Rawlings Green, East Chippenham development template	<p><i>Under 'Landscape' amend bullet 2 to read:</i></p> <p>'New woodland planting and tree belts required along ridgelines and along contours to screen and break up development on sloping higher ground and fragment the new urban edges with the countryside.'</p>	Clarification of requirements for site.
	Page 246, Rawlings Green, East Chippenham	<p><i>Under 'Landscape' add bullet:</i></p> <p>'Indicative greenspace should run to the north</p>	To enable public access to the right of way over the

Ref'	DPD Ref'	Change	Reason
	development template	<u>east of the employment site to enable public access to the right of way over the railway and act as a landscape buffer. Greenspace and public access may be appropriate along the North West side of the site.</u>	railway and act as a landscape buffer.
	Page 246, Rawlings Green, East Chippenham development template	<i>Under 'Archaeology and Historical Interest' add bullet:</i>  <u>'Further archaeological investigations should be carried out to inform any planning application'.</u>	To ensure that undiscovered archaeology has been recorded.
<b>South West Chippenham Strategic Site</b>			
	Page 248, Appendix A, South West Chippenham Strategic Site Map	<i>Amend map to show land within the Rowden Conservation Area currently shown as indicative housing to be green space instead (south west corner).</i>	In response to representations received.  The strategic sites process had regard to the Rowden Conservation area and considered that proposed housing could be appropriate along the edges, but not within the Conservation Area. The map earlier at page 59, which shows the strategic site coloured blue and indicative green space is correct.
	Page 248, Appendix A, South West Chippenham Strategic Site South West Strategic Site key Objectives	<i>Amend Key Objectives Bullet Point 5 'Development to enhance the River Avon Corridor and its connectivity to the town and wider countryside' to read:</i>  "Development to enhance and protect the landscape quality and biodiversity of the River Avon corridor, promoting its recreational use, and the sites connectivity to the town and wider countryside through enhanced pedestrian and cycle access along the corridor."	In response to representations received.  This is the wording included for the Rawlings Green East Chippenham Site, which is also appropriate for the South West Strategic Site because the site also includes land within the River Corridor.
	Page 248, South West Chippenham development template.	<i>South West Chippenham strategic site map amend map as follows:</i>  To indicate that all of land within Rowden Conservation Area is indicative greenspace.	Error on map. Development would substantially harm that character and is therefore contrary to the National Planning Policy Framework.
	Page 249, South West	<i>Under 'physical requirements' add bullet:</i>	Advice to date indicates that it



Ref'	DPD Ref'	Change	Reason
	Chippenham Proforma	<u>'Provide recognition that the extraction of minerals is likely to be problematic due to high water table and poor quality of minerals.'</u>	would be uneconomic to extract the minerals due to the amount, quality and high water table.
<b>Land at Horton Road, Devizes</b>			
	Page 254, Land at Horton Road, Devizes development template.	<i>Under 'Green Infrastructure and Biodiversity': amend bullet 2 to read:</i>  Development should not impinge on the <u>function of</u> footpath BCAN6.  <i>First bullet under Landscape remove:</i>  'Large and'	To increase flexibility.
	Page 254, Land at Horton Road, Devizes development template.	<i>Under 'Landscape' amend bullet 1 to read:</i>  The development should provide an appropriate and enhanced entrance to Devizes in keeping with the local landscape and townscape character. <del>Large and</del> Visually intrusive buildings should be avoided, particularly facing the AONB or entrances to the town.	To provide more clarification to improve effectiveness of requirements.
<b>Ashton Park Urban Extension, South East of Trowbridge</b>			
	Page 262, Appendix A, Map - Ashton Park Urban Extension, South East of Trowbridge	<i>Update map to show the consented employment area at West Ashton Road, the consented East Trowbridge Strategic Site, the North of Green Lane consented site and the Southview Farm development. These commitments are shown on the Community Area Map (Figure 5.19) but are omitted from the Plan in Appendix A.</i>	Ensures a consistent approach to all maps.
	Page 263, Appendix A. Ashton Park Urban Extension, South East of Trowbridge 'Green infrastructure', 2 <sup>nd</sup> bullet point	<i>Add 'links' so that the sentence reads:</i>  'Provision of a multifunctional green infrastructure corridor along the length of the adjacent River Biss, linking the development with the town; to provide sustainable transport <u>links</u> , informal recreation, flood mitigation, enhanced biodiversity and strengthened landscape character.'	To improve clarity.
	Page 262, Ashton Park Urban Extension development template.	<i>Ashton Park Urban Extension, South East of Trowbridge strategic site map</i>  <i>Amend map as follows:</i>  To show the consented employment area at West Ashton Road, the consented East Trowbridge Strategic Site, the North of Green Lane consented site and the Southview Farm development. Also include land south of West Ashton Road, currently omitted from the strategic site in light of the latest land control at South East Trowbridge.	To ensure a consistent approach to all maps.  To ensure the site adjoins the continuous built edge of Trowbridge
	Page 263, Ashton Park Urban Extension development template.	<i>Under 'Physical Requirements' amend bullet 6 to read:</i>	To clarify that the requirements are sought to serve the

Ref'	DPD Ref'	Change	Reason
		Capacity improvements to water supply and waste networks <u>to serve the development</u> .  <i>Amend 9<sup>th</sup> bullet point as follows:</i>  Connection to existing low or medium pressure gas mains <u>to serve the development</u> .	proposed development.
	Page 263, Ashton Park Urban Extension development template	<i>Under 'Physical Requirements' amend bullet 8 to read:</i>  'Reinforcement of the electricity network and primary sub-station <u>to serve the development</u> '.	To clarify that the requirements are sought to serve the proposed development.
	Page 263, Ashton Park Urban Extension development template	<i>Under 'Physical Requirements' amend bullet 9 to read:</i>  Connection to existing low or medium pressure gas mains <u>to serve the development</u> .	To clarify that the requirements are sought to serve the proposed development.
	Page 263, Ashton Park Urban Extension development template	<i>Under 'Social and community' amend bullet 4 to read:</i>  'Financial contributions towards childcare provision facilities or on site provision, <u>to serve the development</u> '.  <i>Amend 5<sup>th</sup> bullet as follows:</i>  Financial contributions towards a new surgery and dental provision or on-site provision <u>to serve the development</u> '.	To clarify that the requirements are sought to serve the proposed development.
	Page 263, Ashton Park Urban Extension development template	<i>Under 'Social and community' amend bullet 5 to read:</i>  Financial contributions towards a new surgery and dental provision or on-site provision <u>to serve the development</u> '.	To clarify that the requirements are sought to serve the proposed development.
	Page 263, Ashton Park Urban Extension development template.	<i>Under 'Green Infrastructure' amend bullet 2 to read:</i>  'Provision of a multifunctional green infrastructure corridor along the length of the adjacent River Biss, linking the development with the town; to provide sustainable transport links, informal recreation, flood mitigate, enhanced biodiversity and strengthened landscape character.'	To improve clarity.
	Page 263, Ashton Park Urban Extension development template.	<i>Under 'Ecology' amend bullet 1 to read:</i>  '100m woodland/ parkland buffer between <u>all ancient woodland, including Biss Wood and Green Lane Wood</u> , and built development'.	For clarity
<b>West Warminster Urban Extension</b>			
	Page 265, West Warminster Urban Extension development template.	<i>Under 'Use' add a paragraph:</i>  <u>Note: the area identified a 'indicative mixed use' represents an area of land that is much larger than that is required to deliver 900 homes and 6 ha employment and associated</u>	Representations have highlighted that the area is much larger than that that could accommodate 900

Ref'	DPD Ref'	Change	Reason
		<u>facilities. The final development area is yet to be identified through a comprehensive masterplanning process with the community. The masterplanning process will need to consider all aspects of this development template and the larger area of land provides space for further mitigation if required to cover areas such as landscape and the impact on the Warminster Conservation Area. It does not provide for additional development and the development quanta will remain set at 900 homes and 6 ha employment.</u>	dwellings and 6 ha of employment land. It is felt that a note is needed to ensure that this is the level of development delivered.
<b>Land at Station Road, Westbury</b>			
	Page 273, Land at Station Road, Westbury, development template	<i>Under 'Transport' amend bullet 2 to read:</i>  'Provision of a link road connecting Station Road and Mane Way, via a new railway bridge crossing, <u>part of the cost of this is already held in a bond.</u> '	For clarification.
	Page 273, Land at Station Road, Westbury, development template	<i>Under 'Social and Community' remove bullet 1:</i>  <del>Contribution to development of childcare provision at Leigh Park.</del>	Wiltshire Council's intention is to offer the nursery site for development in partnership with a commercial operator.
	Page 273, Land at Station Road, Westbury, development template	<i>Under 'Physical Requirements' remove bullet 9:</i>  <del>Re-instate former platform at Westbury Station.</del>	Consistency of approach because this is an operational matter for the relevant franchise operator and any perceived need for this does not clearly relate to the site.
<b>Appendix C – Housing Trajectory</b>			
	Page 311, Appendix C: Housing Trajectory	<i>Delete text and diagram in relation to:</i>  Previously developed land trajectory, (previously required by PPS 3 and no longer required by the NPPF).	Previously developed land trajectory previously required by PPS 3 and no longer required by the NPPF
	Page 311, Appendix C: Housing Trajectory	<i>Add text and diagrams in relation to:</i>  <ol style="list-style-type: none"> <li>1. Housing five year land supply statement</li> <li>2. Gypsy and Travellers five year land supply statement</li> <li>3. Housing trajectory</li> <li>4. Affordable housing trajectory</li> </ol>	Update to reflect NPPF requirements, and planning policy for traveller sites in response to consultation comments received to demonstrate the strategy plans for a 5 year supply including contingency.
	Page 311, Appendix C:	<i>Add:</i>	To provide clear

Ref'	DPD Ref'	Change	Reason
	Housing Trajectory	Detailed summary of land supply (from the AMR)	and up to date evidence base and greater transparency.
	Page 312, Appendix C: Housing Trajectory	<i>Figure C.1:</i> <i>Replace with correct diagram</i>	Drafting error. The wrong trajectory has been included at Figure C.1.
<b>Appendix D - Saved Policy</b>			
	Page 315, Appendix D: Saved Policies and policies replaced	<i>Remove Policy HC2 Devizes Hospital from list of saved policies</i>	Policy to be removed as PCT ownership is expected to continue.
	Page 315, Appendix D: Saved Policies and policies replaced	<i>Remove policies HC10 and HC11 from list of saved policies</i>	Policies to be removed as PCT ownership is expected to continue.
	Page 329, Appendix D: Saved Policies and policies replaced	<i>Save H18</i>	Drafting error
	Page 335 / 336, Appendix D: Saved Policies and policies replaced	<i>Remove policies H16, 19, 20, 21 and E18 from list of saved policies</i>	To provide consistent policy approach across Wiltshire.
<b>Appendix E - List of settlement boundaries retained</b>			
	Page 345, Appendix E: List of settlement boundaries retained	<i>Sort Appendix E: List of settlement boundaries retained by 'Large Village' and 'Small Village' and refer to this list within Core Policy 1, page 24.</i>	Will simplify the use of the plan.
	Page 345, Appendix E: List of settlement boundaries retained	<i>Add 'Durrington', 'Bulford' and 'Marlborough' to list of settlement boundaries retained.</i>	Drafting error.
<b>Glossary</b>			
	Page 229, Glossary and common acronyms	<i>Add definition of "Brownfield site" to glossary.</i>	Technical term; clear definition would add value and benefit the reader.
	Page 229, Glossary and common acronyms	<i>Add definition of "Environment Agency" to glossary.</i>	Definition of the roles and responsibilities of this organisation would be to the benefit of the reader.
	Page 229, Glossary and common acronyms	<i>Add definition of 'Green Infrastructure' to Glossary:</i>	Definition of GI required for clarity.

#### Part B: Typing and minor drafting errors

Ref'	Ref'	Change
	Page 17, Para 3.6, Bullet point 5	<i>Change paragraph to read:</i>  'Land will have been used efficiently and for all developments to be low-carbon or zerocarbon will have been <del>maximised</del> optimised...'

Page 18, Para 3.7, Bullet point 1	<i>Amend to read:</i>  End of first line reads 'lans' replace with ' <u>plans</u> '
Page 27, Para 4.23	<i>Amend to read:</i>  Remove the word 'be' from the last sentence.
Page 27, paragraph 4.24, 6 <sup>th</sup> bullet	<i>Add the text at the end of sentence:</i>  <u>'...village design statements, and neighbourhood development orders.'</u>
Page 28, Para 4.28	<i>Amend to read:</i>  The word 'rea' should be replaced with 'area'.
Page 30, Core Policy 2	<i>Change:</i>  'within the Proposals Map' to ' <u>on the Proposals Map</u> '
Page 30, Core Policy 2	<i>Local Plan allocations and Vision Sites should be included in the list of strategic developments.</i>
Page 30, Core Policy 2, Within the defined limits of development, last paragraph,	This paragraph should be moved to the end of the section on 'Outside of the defined limits of development'.
Page 30 / 35, Core Policy 1 / 2, large & small village policy text	<i>Change Wording of Core Policy 1 from:</i>  'local' to ' <u>of settlements</u> '.
Page 31, Core Policy 2	<i>Amend the strategic development site from:</i>  'South East Trowbridge' to ' <u>Ashton Park, South East Trowbridge</u> '.
Page 65, Para. 5.59, Bullet point 2 & 3	Bullet point 2 - Corsham Media Park is now called <u>Spring Park</u> .  Bullet point 3 - typo. It states MD rather than <u>MOD</u> .
Page 68, Core Policy 11	<i>Change text to read:</i>  'There will be no strategic housing or employment allocations <del>at</del> <u>in</u> Corsham.'
Page 85, Para 5.79	<i>To clarify paragraph amend to read:</i>  <u>'A high level of residential development is already proposed in Melksham, including a planned urban extension to the east of the town, on land identified in the West Wiltshire District Plan (2004). This planned development will go some way towards addressing the future affordable housing need in the town.'</u>
Page 121, Para. 5.137, Bullet point 3	<i>Amend paragraph to read:</i>  '...the use of brownfield land <del>will</del> may also enable the protection of sensitive areas...'
Page 195, Para 6.76	<i>Amend paragraph to read:</i>  'However Core Policy <del>40</del> <u>51</u> also addresses development outside these areas which could affect the setting of these highly valued landscapes.'
Page 142, Warminster Area Strategy	<i>Under 'Issues and considerations', paragraph 5.155:</i>  <i>Amend bullet 1 to read:</i>  a mix of housing and employment growth will facilitate the delivery of improved community facilities in Warminster through developer contributions. These may include <u>expansion or alterations</u> of the fire station and ambulance service centre, which are either at capacity or

		in need of major refurbishment. There is also a need for expansion or relocation of existing GP surgeries, facilities for young people in the town are also particularly lacking, the library is in need of enhancement and further cemetery provision is needed
	Page 155, Wilton Area Strategy	<i>Under 'Issues and considerations', paragraph 5.171:</i>  <i>Amend bullet 6 to read:</i>  development in the vicinity of the River Avon (Hampshire) or <del>Perseombe</del> <u>Prescombe</u> Down must protect the habitats, species and processes which maintain the integrity of these Special Areas of Conservation.
	Page 206, Core Policy 57	<i>Under 'Ensuring high quality design and place shaping':</i>  <i>Amend numeral I to read:</i>  i. enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the <del>existing</del> <u>existing</u> pattern of development and responding to local topography by ensuring that important views into, within and out of the site are to be retained and enhanced
	Page 206, Core Policy 57	<i>Under 'Ensuring high quality design and place shaping':</i>  <i>Amend numeral ii to read:</i>  ii. the retention and enhancement of existing important <del>landscaping</del> <u>landscape</u> and natural features, (for example trees, hedges, banks and watercourses), in order to take opportunities to enhance biodiversity, create wildlife and recreational corridors, effectively integrate the development into its setting and to justify and mitigate against any losses that may occur through the development
	Page 206, Core Policy 57	<i>Under 'Ensuring high quality design and place shaping':</i>  <i>Amend first paragraph to read:</i>  A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being <del>complimentary</del> <u>complementary</u> to the locality. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through:
	Page 226, Para 6.178	In paragraph 6.178 (2 <sup>nd</sup> sentence), replace the word 'preclude' with ' <u>prejudice</u> '.
	Page 272, Land at Station Road, Westbury development template	<i>Under 'Key Objectives':</i>  <i>Amend bullet 4 to read:</i>  To minimise the realignment of the lake in securing a link road connecting Station Road and <del>Main</del> <u>Mane</u> Way, and make alternative suitable provision for the sailing club if required.
	Page 272, Station Rd Westbury development template	<i>Amend to read:</i>  <u>Mane</u> Way.
	Pages 276-309, South	Replace references to policy numbers within the South Wiltshire

	Wiltshire development templates (general)	Core Strategy with references to the relevant policy numbers within the Wiltshire Core Strategy.
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### **Appendix 3 Summary of key issues raised which have not led to proposed changes to the Wiltshire core strategy pre-submission document**

#### **1. Overview**

- 1.1. This report provides a summary of the key issues that were raised during the consultation where officers do not consider a change to the strategy would be appropriate to address the issue. The report begins with an overview of some of the main issues which arose across the plan as a whole, and sets out the reasons why officers do not consider changes are necessary in response to these issues. The later sections of the report then provide a more detailed overview for each section of the Wiltshire Core Strategy Pre-submission Document. It should be noted that this report only focuses on the key issues which were raised for each part of the plan, and a more detailed summary of issues raised is available in a separate report. It is also worth noting that, whilst this report focuses on issues raised which have not resulted in changes being proposed by officers, some of the more detailed overviews presented in section 2 do also refer to issues where changes have been proposed in response to the representation. The overviews make it clear where this is the case, and a list of all the changes proposed by officers is available in a separate report.
- 1.2. The consultation process on the Wiltshire core strategy pre-submission document has been successful and officers agree with a number of suggested changes to the plan to improve its clarity and implementation. However, the majority of representations received have not led to any proposed changes to the strategy. There are a number of reasons for this and some of the detailed comments are explained in the later sections of this report. In summary, it is considered that changes to the core strategy would not be justified in regard to many of the comments received for a range of reasons, including that; there is insufficient evidence to support a change, the issues raised are already covered by another area of the core strategy, and the lack of deliverability, including non-viability, of possible changes. Some examples of the headline objections that were raised to the plan and the reasons they have been set aside are provided below.
- 1.3. There have been a number of representations stating that the housing figures in the strategy are wrong. These are fairly evenly split between those parties who feel the growth levels are too low (predominantly house builders and planning agents) and those who consider the numbers too high (predominantly local residents). This is a common tension with plan making and is to be expected. Due regard has been given to all representations and it is considered that the housing numbers set out in the plan achieve the most appropriate balance taking account of the future needs of Wiltshire while respecting the environmental, social and economic characteristics of the area. The numbers are an appropriate target to help secure a viable future for our communities but proportionate to the capacity of the area to accommodate new housing in a sustainable manner. They are based on locally assessed evidence on need; a methodology already tested and found sound by an independent inspector through the South Wiltshire Core Strategy examination process.
- 1.4. Representations have been received questioning one of the core principles of the strategy, namely addressing the self-containment of our main settlements to improve their resilience and make them more sustainable. These representations state that we should accept out commuting and plan for less growth accordingly. The course of action proposed does not accord with national planning policy or the core vision of Wiltshire Council. It would lead to our main settlements providing a greater dormitory function and thereby increase out-commuting in a manner not wanted by the local community and counter to the aims of achieving sustainable development.

- 1.5. A number of developers and planning agents have suggested that the core strategy is too restrictive, especially in the rural areas, where further relaxation of planning policy should be allowed to facilitate more development. However the Wiltshire core strategy defines what is considered sustainable development within the local context and also sets a framework for neighbourhoods to make their own decisions about how their communities should grow through neighbourhood planning. Relaxing this definition would lead to high levels of speculative development in our rural areas away from services and jobs.
- 1.6. A number of respondents have stated that the start of the 'plan period' should be recast to more accurately reflect current completion rates and that reserve / contingency sites should be identified to respond to potential shortfalls over the plan period. However, it is not unusual for the base date to precede the adoption date of a plan. Clearly, the council will continue to monitor such matters as completion rates to ensure that the overall evidence base remains current and up-to-date. The council does not consider there is a justifiable need to add 'contingency sites' into the plan. An element of windfall development has been accounted for; and, in overall terms, the plan is premised on a flexible and positive approach to development. The encouragement of the preparation of appropriate neighbourhood plans to address local development needs will also help address the issue of supply over the life of the plan.
- 1.7. There have been a number of representations regarding the strategy for Chippenham. Many have questioned the scale of growth in Chippenham and whether it accords with Government policy. Many consider that the level of growth will have unacceptable environmental and other impacts and that brownfield sites should be prioritised. A number of alternative sites have also been promoted around the town. The proposals for Chippenham are in accordance with the National Planning Policy Framework and the core principles for sustainable development. There are limited opportunities for the redevelopment of brownfield sites and it is therefore necessary to identify greenfield sites on the edge of the town. The evidence which underpins this is set out in the topic papers which were published alongside the pre-submission document, and in particular in topic paper 12: site selection process. The strategic sites at Chippenham will help achieve the overall objective of improved self-containment. There is no credible evidence to suggest that alternative options put forward for the growth of Chippenham are a better alternative to those in the Wiltshire core strategy.
- 1.8. A further common theme is that the Wiltshire core strategy is not ambitious enough with regard to tackling climate change, and that more stringent policies including requiring zero-carbon development should be included. These changes are not considered appropriate as in order to pass the tests of soundness the core strategy must be deliverable and ensure economic investment opportunities are viable. Evidence indicates that moving to extreme climate change measures will undermine the growth required to meet Wiltshire's needs.

## **2. Summary of issues raised which have not led to proposed changes for each section of the core strategy**

- 2.1. The following paragraphs provide a summary of the main issues raised in relation to each section of the core strategy, and the reasons why officers have not proposed changes to the strategy in response to these issues (*reasons are presented in italics*).

## 2.2. Introduction

- The introduction became the consultation point against which many comments on the consultation process were recorded. This included concerns about the consultation process in general and specifically a lack of clarity on what comments could be made. *It is considered that the consultation process undertaken was fully compliant with the regulations and the Wiltshire Council Statement of Community Involvement.*
- It was queried as to whether there really has been a bottom up approach to the generation of housing figures. *The justification for the housing figures is set out in topic paper 15 (housing requirement technical paper). A balanced approach has been taken, which takes account of community views but which is also in line with national policy and is based on evidence of likely future housing need.*
- Concern was raised that the strategy does not adequately address diminishing water resources. *However, core policy 68 relates specifically to water resources. In addition, the core strategy has been subject to consultation with the Environment Agency and consultation with water companies has helped inform the Infrastructure Delivery Plan.*

## 2.3. Spatial portrait and spatial vision

- No key strategic issues were raised which have not either been addressed through proposed changes to the core strategy or have been covered elsewhere in this report.

## 2.4. Core policy 1: settlement strategy

- There was widespread support for the settlement strategy including representations from a number of neighbouring authorities, town and parish councils and developers. However a large number expressed preferences for minor changes in policy wording and/or approach.
- *There are no significant changes proposed to the settlement strategy. There was no substantial evidence offered that would require a change to the overall policy or any of the individual types of settlement identified.*

### **Individual settlements**

- No new evidence was brought forward that would justify a change to the status of the majority of settlements. In those cases where a change is considered appropriate this has been identified in the list of proposed changes.
- There was strong support for Trowbridge and Salisbury being identified as Principal Settlements.
- There was some support for designation of Chippenham as a Principal Settlement however a number of comments were opposed for reasons including:
  - Designation perpetuating artificially imposed policy by the Regional Spatial Strategy, in direct contradiction to Chippenham residents' expressed desire.
  - Chippenham has been, and still is a "Market Town". Its saving grace is its beautiful, rural aspect which improves the quality of life.
  - Chippenham cannot support more traffic congestion and further parking problems.

*It is considered that Chippenham should continue to be identified as a Principal Settlement, as in the pre-submission document, as this reflects the role and function of the town.*

- There was support for the majority of Market Towns.

- Comments from developers highlighted some settlements as having a need for their role in the strategy to be strengthened, i.e. that they should be at a higher level in the settlement strategy. Those settlements were Devizes, Warminster, Pewsey and Purton. *Officers have considered these comments and the evidence available, and it is considered that the classification of these settlements should remain as set out in the pre-submission document.*
- A number of minor centres were mentioned either with support or with suggested changes, and this included comments from parish councils and developers. There was support for the classifications of Mere, Chilton Foliat, Lydiard Tregoz and Hullavington. Changes were proposed to the classification of Market Lavington, Bowerhill, Easterton and Etchilhampton. The suggestions were that Easterton should be identified as a large village, that Etchilhampton should not be identified as a small village, that Bowerhill should be identified as a separate settlement rather than being included with Melksham, and that the relationship between Market Lavington and nearby settlements should be considered. *After consideration of the comments and the evidence available, it is considered that the classification of these settlements should remain as set out in the pre-submission document.*

### **Small settlements/villages**

- The majority of comments regarding the policy at villages/small settlements were from agents and landowners who felt that the policy was overly restrictive. It was contended that this would lead to a stagnation of rural life affecting the viability of these communities. The majority of comments from parishes and individuals either supported or argued that the policy was ambiguous. *Core policy 1 has identified over 70 rural settlements where there is an expectation of development to support housing, employment and facilities in rural areas. It is considered that this is a positive policy approach that allows appropriate development to come forward within these settlements and the core strategy also includes flexibility for certain types of development, such as affordable housing, to come forward outside these settlements.*
- It was suggested that the council needs to prove through the Strategic Housing Land Availability Assessment that there is capacity for infill development at the small settlements. There were also requests for changes to the policy relating to specific sites. *Changes are not considered necessary in response to these comments. Sites outside the settlements can be identified as appropriate through a neighbourhood plan or a site allocations development plan document, and the core strategy also includes flexibility for certain types of development to come forward outside the settlements. The council will monitor housing delivery and can take steps to rectify the situation (for example through a future planning policy document) if there is difficulty with the supply of infill sites.*

### **Settlement boundaries**

- Support for the retention of settlement boundaries at small villages came from parishes and some individuals. However, this was again outweighed by developers, agents and other organisations with rural agendas, arguing that settlement boundaries impose limits on development and should either be removed or redrawn, or policy should be amended to allow development outside boundaries. *The policy mechanism in core policies 1 and 2 will ensure that the right development is correctly located. The task of redrawing or creating new boundaries is unachievable as it would require a level of consultation more suited to neighbourhood plans or development plan documents. To retain boundaries at small settlements would leave an inconsistent policy approach across Wiltshire. Amending boundaries or allowing development outside boundaries is unnecessary as the policy approach provides a clear delivery mechanism through neighbourhood*

*planning or a future site allocations development plan document. Furthermore, as stated above, the core strategy includes flexibility to allow certain types of appropriate development to come forward outside settlement boundaries.*

### **Relationship with Swindon**

- Developers are promoting the inclusion of (west of) Swindon as a 'settlement' in Core Policy 1. This is neither supported by the community beyond developers nor considered necessary. *Swindon is rightly acknowledged as a major centre on the edge of Wiltshire in the spatial portrait and providing a categorisation of a non-existent settlement is artificial and would be contrary to the principles of core policy 1.*

### **2.5. Core policy 2: delivery strategy**

#### **The Plan Period**

- There were many responses suggesting that the plan period should be extended to at least a 15 year timeframe. This issue was also raised throughout the community area strategies. *The existing time frame accords to the National Planning Policy Framework, which only refers to a 15 year plan period being preferable, and there is therefore no requirement to extend this.*

#### **The Housing Requirement**

- The issue was raised that the housing requirement does not provide sufficient flexibility to respond to change. This issue was raised throughout the community area strategies. *However the requirement provides a minimum level for growth which taken in conjunction with the support of neighbourhood plans, and the potential for policy review, provides more than sufficient flexibility to respond to the market and other changes.*
- It was argued that the housing requirement does not significantly boost the supply of housing. *However, the minimum level of housing proposed is greater than that in the previously adopted plan.*
- Respondents proposed that the housing requirement should at least accord with the CLG household projections, other economic projections or with other housing projections undertaken by respondents. *This approach of adhering to trends does not conform with the requirement of the National Planning Policy Framework to objectively assess the requirement for housing and to meet that need as far as is consistent with the policies set out in the Framework. Wiltshire Council have carried out a full objective assessment of need through topic paper 15 (housing requirement technical paper).*
- Respondents identified that the housing requirement was not great enough to provide the identified level of affordable housing within the Strategic Housing Market Assessment. *However, it can be demonstrated that the core strategy will deliver the majority of homes to meet the identified need, thus optimising delivery of affordable housing.*
- There is concern at where the sub-regional housing requirement will be met given that neighbouring authorities and Wiltshire have decreased their housing requirement. *The reductions have reflected the economic decline, which has resulted in an actual decline in the housing requirement across the UK.*
- Given that the Regional Spatial Strategy proposed changes are the most recently examined housing requirements, it was argued that these should be maintained. *This negates more up to date evidence and would be wholly unjustifiable.*
- Wiltshire has capacity for a higher level of dwellings but the core strategy is not planning to deliver this many. *The core strategy is seeking to deliver a sustainable level of homes rather than building to capacity.*

- Respondents argued that the housing requirement is dependent upon commuting flows changing, which is unrealistic. *This has been considered in topic paper 15 and by considering the make-up of the labour force this can be demonstrated to be realistic.*
- It was raised that infrastructure was already over-burdened and could not cope with additional housing. *Positive steps are being taken to address infrastructure provision through the Infrastructure Delivery Plan in conjunction with the core strategy.*
- Several respondents suggested that there was no justification for the housing requirement. *The justification is set out in full in topic paper 15.*

### **The distribution of the housing requirement**

- The use of Housing Market Areas (HMAs) was questioned. *However this is in conformity with the National Planning Policy Framework.*
- It was identified that the change of housing requirements compared to that in Wiltshire 2026 is not consistent across the area. *This is a result of detailed analysis being undertaken of the issues and opportunities for each area and appropriate levels are proposed to address these.*
- Some respondents felt that the distribution of the housing requirement was too restrictive. *However, by assessing land supply across Housing Market Areas this provides flexibility to deliver in a timely manner at appropriate locations whilst also providing some certainty for areas as to the levels of growth they can expect.*

### **Phasing**

- Respondents argued that the delivery of employment should be forthcoming prior to housing. *This is supported within the strategy (including the need to manage the delivery of development on mixed use strategic sites) but there is no clear evidence to justify the need to constrain the overall housing requirement through phasing over the plan period.*
- It was also argued that a policy should exist that ensures that housing delivery is appropriately phased. *However, the same argument applies, as set out above.*

### **Employment land requirement**

- It was suggested that the employment land requirement should be amended to be a minimum in accordance with the housing requirement. *However, this is not supported by evidence and the requirement is already ambitious offering flexibility and choice.*

### **Brownfield development**

- It was argued that brownfield development outside of the settlement framework should be supported. *However, this would not be sustainable as the development would be remote from facilities.*
- Respondents argued that there should be a mechanism to prioritise brownfield development to meet the identified target. *The National Planning Policy Framework does not seek to prioritise but rather seeks opportunities to bring forward brownfield development. Furthermore, such an approach would be unenforceable.*
- Respondents argued that the brownfield target should be increased or decreased. *However no evidence was provided for this.*

## Delivery of development

- Respondents wanted further clarity on how additional sites will be brought forward. *Core policy 2 provides clarity on where development will be supported, and identifies the mechanisms by which further sites will be brought forward. Further clarity cannot be provided until the need for these is determined.*

## 2.6. Core policy 3: infrastructure requirements

### Prioritisation

- There were some requests for certain types of infrastructure, e.g. open space and green infrastructure, to be listed under essential infrastructure and not place-shaping. *However, the order of prioritisation refers to the timing of provision and not the relative importance of different types of infrastructure. Also, some types of infrastructure may provide multiple benefits.*
- There was criticism that the prioritisation of 'essential' and 'place-shaping' infrastructure is too general an approach. *However, this is applied to individual community areas in the Infrastructure Delivery Plan and the specific needs of these areas/sites are identified.*
- There were requests that a full definition of 'essential' and 'place-shaping' infrastructure should be provided. *An explanation is set out in the supporting text to core policy 3. More detail is provided in the accompanying Infrastructure Delivery Plan.*

### Payment of developer contributions

- There were requests for developer contributions to be payable so as to allow the provision of infrastructure in stages alongside development, not prior to development taking place. *However, some infrastructure needs to be provided and paid for before development takes place (e.g. utilities, access roads etc.) and, in any case, the policy requires contributions 'prior to, or in conjunction with' development.*
- Some responses commented that core policy 3 should recognise that, in some cases, a scheme will be unable to pay for all the required infrastructure even if payments are deferred to a later date. Other responses commented that planning permission itself should be deferred until the developer can afford to pay for all of the necessary infrastructure without the option to defer payments. *However, core policy 3 needs to provide a balance between ensuring the necessary infrastructure is in place to support development and not unduly putting development at risk.*

### Community involvement

- Some responses requested a firmer indication of the level of Community Infrastructure Levy (CIL) to be set and for the Infrastructure Delivery Plan for each community area to be fully costed and delivery partners made aware of the implications in each area. *However, the level of Community Infrastructure Levy to be set will need to be based upon viability evidence and not policy requirement. This viability evidence will support the establishment of a Community Infrastructure Levy charging schedule. The Infrastructure Delivery Plan is based on the best available evidence and will be updated and reviewed as further evidence comes to light. Delivery partners were involved in and supplied information contained within the Infrastructure Delivery Plan.*

## **Planning obligations/ Community Infrastructure Levy**

- Some responses requested that the guidance note on planning obligations and the Community Infrastructure Levy charging schedule should be in place alongside the submitted core strategy. *However, the charging schedule and interim guidance note/ supplementary planning document on planning obligations are programmed for adoption following the core strategy and will provide further guidance on the application of core policy 3.*

### **2.7. Community area strategies**

#### **Amesbury**

- Detailed comments were received on the wording of CP6 (Stonehenge). *Officers agree that two changes should be made, but the remainder of the comments are not accepted as they do not affect the soundness of the plan.*
- There was concern that evidence base supporting changes to Amesbury is limited through reliance on previous planning effort focused on Salisbury.
- Amesbury Town Council are concerned that the housing sought in Kings Gate area may require balancing growth in retail, road, education and leisure facilities.
- Promoters for Solstice Park argued that the Principal Employment Areas should be shown on the proposals map and that the previous local plan employment allocation at Solstice Park should be saved.
- It was suggested that the bullet points in relation to Salisbury Plain Special Protection Area and the River Avon Special Area of Conservation are not in line with the Habitats Directive and changes to the text were suggested.
- *The consultation responses regarding the proposals for the Amesbury community area did not raise any issues or present any new evidence which would undermine the soundness of the core strategy. The strategy and text for Amesbury was incorporated into the Wiltshire Core Strategy from the adopted South Wiltshire Core Strategy (SWCS). There were some minor changes made to ensure the effective amalgamation into the wider document. However the amended text is a reflection of the SWCS and the binding inspectors report. It continues to be the case that officers are of the opinion that the proposals within Core Policy 4 continue to be justified, effective and in accordance with the NPPF. A few minor changes to the text have been proposed to improve the clarity of the area strategy, and these proposed changes are listed in a separate report.*

#### **Bradford on Avon**

- Two alternative strategic sites were suggested by the development industry: Land North of Holt Road and Land at Bradford on Avon Golf Course. *Both sites have already been considered through the site selection process set out in Topic Paper 12 and as a result of the evidence available are not considered to be the preferred location for growth.*
- There was a suggestion that an alternative area should be identified for the Holt 'area of opportunity'. *There is insufficient evidence to justify any change to the Holt 'area of opportunity'. The plan is already considered sound without the suggested changes and the proposed amendments would not improve the clarity of the core strategy.*
- The promoters of the Kingston Farm site requested a number of changes to the development template, including changes to the level of employment land to be provided and the removal of the indicative green space. *The spatial strategy recognises the importance of delivering new jobs and infrastructure alongside future housing delivery. Therefore it is considered inappropriate to amend the site requirements in the core strategy.*



## Calne

- Some comments including from the development industry called for a higher housing requirement for the area. *The housing requirement for Calne is sound and provides a minimum figure for development. The Core Strategy establishes a framework to allow development above and beyond the requirement to be explored through an alternative mechanism such as either the neighbourhood plan process or a subsequent sites allocations DPD.*
- Three sites for development were put forward for development: Land at High Penn, Land at Oxford Road and Land off Castle Walk. The developer promoting Land off Castle Walk also requested that the settlement boundary be redefined to include the site. *The Core Strategy establishes a framework to allow sites to be explored and identified through an alternative mechanism such as either the neighbourhood plan process or a subsequent sites allocation DPD.*
- There was a suggestion that a direction of growth should be identified and that a site should be identified to meet the needs of elderly care provision. *Wiltshire has an ageing population and Core Policy 46 seeks to address the needs of Wiltshire's ageing population by setting out the requirements to be taken into account when planning for new housing. This includes, for example, ensuring there is adequate provision of specialist accommodation, such as extra care housing. Therefore it is not considered necessary to identify specific sites. However, consideration could be given to allocating specific sites for development through the neighbourhood planning process, or a site allocation development plan document if appropriate.*
- It was suggested that a rural buffer should be identified to the east of Chippenham. *The identification of a rural buffer is not considered necessary. The Core Strategy acknowledges Wiltshire's rich and diverse natural, historic and built environment and sets out steps which as far as possible also protects and enhances them including Core Policy 51 Landscape which seeks to enhance Wiltshire's distinctive landscape character.*
- It was suggested that there is a qualitative need for convenience retail within Calne. *The evidence set out in the Topic Papers underpinning the retail policies has included both qualitative and quantitative assessment of retail needs. It is not considered necessary to identify specific sites. It is appropriate for this matter to be considered through the emerging Neighbourhood Planning process or other planning mechanism.*

## Chippenham

### Core Policy 9

- Bath Road/Bridge Centre Site – It was suggested that the statement in CP9 that the Bath Road/Bridge Centre Site will 'provide a supermarket and comparison units' should be deleted. *This text relates to the delivery of Bath Road Car Park/Bridge Centre site for a retail extension to the town. It is not appropriate to delete the text because this has been identified as a key site through the evidence base.*

### Core Policy 10

- Comments from the development industry called for a higher housing requirement whilst comments from the local community called for a lower housing requirement. *The housing requirement for Chippenham is considered to be sound and is justified as a result of evidence set out in the Topic Papers. .*
- Some responses from the local community objected to the level of employment land proposed for Chippenham on the basis that is unrealistically high and does not bear scrutiny or meet the needs of the Chippenham community. *The proposed level of*

*employment land is necessary in order to ensure existing larger employers can be retained and new employers catered for at Chippenham.*

- Some responses say there has been a lack of consideration of brownfield opportunities in the town and the site selection is not in accordance with 'brownfield first' criteria set out in national policy. *Brownfield opportunities have been considered as part of the site selection process for Chippenham set out in topic paper 12. Given the limited opportunities for the redevelopment of brownfield sites in Chippenham, it is necessary to identify greenfield sites on the edge of the town.*
- Some responses have been made specifically about the identification of Showell Farm Employment Site, that the evidence, particularly concerning out-commuting, which has led to its selection is outdated, incomplete and contradictory and that the site isn't viable and there is no certainty that it will be developed as an employment site by the developers, particularly as a firm who were considering relocating to the site have now chosen to relocate to Melksham instead. *The evidence leading to the site selection is set out in Topic Paper 12. To accept out-commuting and not plan to improve the self-containment of the town will lead to the further decline of Chippenham contrary to the strategy for Wiltshire. Developers promoting the site have submitted representations supporting its allocation and have previously provided evidence to confirm that they are committed to the delivery of the site as an employment site. Therefore there is no new evidence to justify the removal of Showell Farm as a strategic employment allocation as part of the South West Chippenham Strategic Site from the Core Strategy.*
- Some responses have suggested that alternative sites for employment, are far more suitable for employment, but have been dismissed too easily without detailed consideration e.g. Junction 17, M4. *Evidence leading to the identification of employment sites is set out in the topic papers. The employment sites now proposed at Chippenham offer the best opportunity to achieve the strategy for the town, which is based on delivering significant job growth which will help to improve self containment.*
- Some responses from the local community and developers promoting alternative sites have suggested the South West Chippenham Strategic site does not comply with the NPPF requirement to be positive and promote a town centre environment, particularly because the South West Strategic site will lead to residents shopping out-of-town and will exacerbate rather than alleviate town centre traffic. *It is acknowledged that the area is closer to out-of town facilities along Bath Road, but it is not considered that this reason should prevent the South West Area of Search site being allocated as a strategic site. The site will still contribute to achieving the strategy for Chippenham. It includes employment and housing, will be well integrated with the town and therefore will help to improve the self-containment of Chippenham.*
- Some responses including from English Heritage have been made suggesting that development at Rawlings Green and South West Chippenham could harm the significance of heritage assets and would be contrary to the NPPF. *The proposed landscaping measures and masterplanning for the site, including appropriate uses for the sites, will address these concerns.*
- Some responses continued to object to the strategic sites identified in Core Policy 10:
  - Alternative strategic sites have been promoted by the development industry. These include Barrow Farm; Forest Farm; East Chippenham; Hunters Moon and Saltersford Lane. Some responses from the local community were opposed to the three strategic sites particularly in terms of the detrimental effect on Birds Marsh Wood; Lacock parish and village; and Monkton Park/Station Hill area.
  - Monkton Park Residents Group suggested that Rawlings Green be removed and replaced with Hunters Moon.
  - Responses from Chippenham Vision Board and Chamber of Commerce objected to the inclusion of South West Chippenham Strategic Site, requested it

be removed and for the East Chippenham site to be reinstated or alternatively that the North Chippenham and Rawlings Green strategic sites remain allocated as strategic sites, but that the location of the remaining 800 dwellings and employment land should be decided either through a Neighbourhood Plan process or as part of the Chippenham Masterplan work which is currently underway.

*At this stage new evidence has not been presented to suggest the strategic sites proposed for Chippenham should be amended or that based on the evidence available any one site or number of sites offer better alternatives to the three strategic sites proposed in the Core Strategy. Chippenham is identified as a Principal Settlement in Wiltshire and development including infrastructure provision at Chippenham should be planned for in a holistic manner rather than on a piecemeal basis.*

- Some responses from the development industry requested the removal of Land South West of Abbeyfield School because it is a non strategic site. *Although this is a small site compared to the other strategic sites at the town, it will contribute to meeting the strategic housing land requirement for Chippenham early in the plan period and will provide an opportunity to develop employment land and facilitate links between business and Abbeyfield School helping to ensure that young people can remain in Wiltshire. Therefore this site should remain identified in the Core Strategy.*
- Support has been expressed by the local community in Tytherton Lucas for the removal of the East Chippenham site, with the request that the area be formally designated as rural buffer/open space. *The identification of a rural buffer is not considered necessary. The Core Strategy acknowledges Wiltshire's rich and diverse natural, historic and built environment and sets out steps which as far as possible also protects and enhances them including Core Policy 51 Landscape which seeks to enhance Wiltshire's distinctive landscape character.*
- Many of the responses from the local community and developers promoting alternative sites expressed concern over the Chippenham Transport Strategy and the lack of evidence to inform the proposals for Chippenham. Developers promoting sites have provided their own transport modelling evidence. *To delay site selection until such time as there is more detailed transport modelling available is not appropriate. New evidence has not been provided at this stage to suggest that the strategic sites should be amended. The site selection process set out in topic paper 12 has considered a range of evidence including but not limited to the transport strategy work.*
- Some responses including from Chippenham Town Council stressed the importance of ensuring appropriate infrastructure is planned for and delivered alongside housing and employment. *Other policies elsewhere in the Core Strategy including Core Policy 3 and the specific requirements set out in the strategic site development templates will ensure that infrastructure is provided alongside further housing and employment.*

## **Corsham**

- The significant issue raised involved the South West Chippenham strategic site not being referenced in the text or development figures for the Corsham Community Area. *It is considered that amendments to the text should be included as a minor change, but that the site should not be included in the figures for Corsham. The development planned for Chippenham serves that community.*
- A number of sites were promoted for inclusion in the core strategy by the development industry. *The housing requirement for Corsham is sound and provides a minimum figure for development. The Core Strategy establishes a framework to allow sites to be explored and identified through an alternative mechanism such as either the neighbourhood plan process or a subsequent sites allocations DPD.*

## Devizes

- Comments from the development industry called for a higher housing requirement for the area. It was also suggested that there is a lack of a 5 year housing land supply in the Eastern Housing Market Area. It was suggested that named strategic sites at Coate Bridge and Lay Wood/Horton Road should be allocated. *The housing requirement for Devizes is sound and provides a minimum figure for development. The Core Strategy establishes a framework to allow sites to be explored and identified through an alternative mechanism such as either the neighbourhood plan process or a subsequent sites allocations DPD.*
- Worton do not wish to be identified as a large village. The parish consider that they do not have the facilities to support this designation. *The council have applied a consistent test to all villages across the Council area and consider, regardless of population, the facilities do exist to support the proposed designation.*

## Malmesbury

- Comments called for either a higher or lower housing requirement for the area. *The housing requirement for Malmesbury is considered to be sound and provides a minimum figure for development. The Core Strategy establishes a framework to allow development above and beyond the requirement to be explored through an alternative mechanism such as either the neighbourhood plan process or a subsequent sites allocations DPD.*
- There was a suggestion the housing requirement should not be set or delivered until it is ensured primary school places can be provided. It was also suggested that it should be made clear that greenfield sites will be required to deliver housing in the rest of the community area and that at the identified Large Villages sites of 1 hectare on the edge of the village boundaries should be allowed. Land at Park Road, Malmesbury was put forward by the developers promoting the site. *The housing requirement and specific non strategic sites will be delivered through the neighbourhood planning process or a site allocations document and primary school provision will be addressed through those processes.*
- It was suggested that the extant North Wiltshire Local Plan employment allocation on land at the Garden Centre should be removed. *The evidence set out in the Topic Papers indicates that this allocation is deliverable and is a suitable site for employment use necessary to deliver the strategy for Malmesbury.*
- It was suggested a town centre study should be carried out. *If required this can be carried through the neighbourhood planning process or an alternative mechanism.*

## Marlborough

- General objections to the amount of development and the strategic site revolved around environmental issues. Air quality was raised as development may lead to breaches of the mandatory limits set by European Directive. Other concerns included the declining condition of the River Kennet and impact on nearby Savernake Forest SSSI. *However, these concerns are covered by Core Policy 55: Air Quality and the Habitat Regulations Assessment (HRA) respectively, which ensure that these are taken into account when development at Marlborough is brought forward.*
- It was suggested that Marlborough's role as a centre of education and tourism presents a case for reinstatement of former railway from Savernake to Marlborough. *Currently rail reinstatement is unlikely due to lack of funding and priorities on the rail network. The Core Strategy should be realistic and infrastructure capable to be delivered.*

## Melksham

- Melksham Town Council expressed concerns that the lack of a strategic site could leave Melksham vulnerable to developers. Melksham Without Parish Council and Hallam Land Management suggested strategic sites for inclusion. *A strategic site is not considered appropriate at Melksham as explained in the site selection process topic paper. Although Melksham Without Parish Council and Hallam Land Management have both suggested that a site should be identified to the south of the existing east Melksham development, there is disagreement as to the scale of development. Sites can be identified through neighbourhood planning or a site allocations DPD.*
- There was a suggestion that Upside Park should not be identified as a Principal Employment Area because it is unsuitable for purely employment development. *It is considered that this site should remain as a Principal Employment Area as it previously had planning permission for employment uses.*
- There was concern that the rural buffer between Melksham and Bowerhill should be protected. *Core Policy 2 indicates that development will not be supported outside settlement boundaries unless it is identified through a neighbourhood plan or a future development plan document.*
- A concern was raised that core policy 15 does not cover the economic and social needs of the whole community area, particularly the villages. *Core policies 34, 48 and 49 cover these issues.*
- There was concern at the identification of Seend and Seend Cleeve as separate settlements. *Seend and Seend Cleeve are considered separately in current planning policy (in the Kennet Local Plan) and it is considered appropriate to continue to deal with these settlements separately for planning policy purposes.*
- There was concern at the identification of Bowerhill as part of Melksham. *It is considered that Melksham and Bowerhill operate effectively as one functional urban area and should be planned for together.*

## Mere

- There was support from a developer on Core Policy 17, with a potential site put forward to accommodate the remainder of development identified. *This can be considered by the community through a neighbourhood planning process, or can be considered through a site allocations DPD.*

## Pewsey

- A number of sites were promoted by the development industry including Land adjacent Salisbury Road, Pewsey and the low amount of development was challenged. *The housing requirement for Pewsey is considered to be sound and provides a minimum figure for development. The Core Strategy establishes a framework to allow development above and beyond the requirement and specific sites to be explored through an alternative mechanism such as either the neighbourhood plan process or a subsequent sites allocations DPD.*

## Royal Wootton Bassett and Cricklade Area Strategy

- Strategic sites were promoted at Brynard's Hill and an undefined area 'south of Wootton Bassett'. *A strategic site is not considered appropriate as explained in topic paper 12. The housing requirement will be delivered through the neighbourhood planning process or a site allocations document.*
- It was suggested that 3,000 dwellings should be allocated to the west of Swindon and that strategic sites should be identified to the west of Swindon. *Historically it has been*

*proposed that part of Swindon's housing need be met in an area to the west of Swindon within Wiltshire. The level of growth for Swindon as evidenced through the emerging Swindon Core Strategy means that there is no longer a need for this development as other alternatives exist.*

- The development industry has noted that there is a qualitative need for convenience retail. *The evidence set out in the Topic Papers underpinning the retail policies has included both qualitative and quantitative assessment of retail needs. It is not considered necessary to identify specific sites. It is appropriate for this matter to be considered through the emerging Neighbourhood Planning process or other planning mechanism.*
- Local residents and Parish comments raised the bringing back the 'rural buffer' and the need to preserve the identity of settlements located close to Swindon. *CP51 (landscape) requires proposals to demonstrate that the locally distinctive character of settlements has been considered, and CP1 (settlement strategy) and CP2 (delivery strategy) provide protection against coalescence. The issue of the rural buffer could be considered further through the preparation of a neighbourhood plan.*

### **Salisbury**

- The following issues were raised during the consultation in relation to the Salisbury community area:
  - Laverstock and Ford Parish council are concerned that there is too much development in the parish and are also seeking the deletion of Core Policy 23.
  - There was also Support for Maltings/CCP redevelopment.
  - There were also comments about the Salisbury Vision, some in support and others questioning some of the sites deliverability.
- *These matters were recently examined as part of the South Wiltshire Core Strategy and no new evidence has arisen to depart from the Inspectors conclusions and the comments do not necessitate any changes to the core strategy*

### **Southern Wiltshire**

- The main issue in this community area was concern that the bullet points are not in line with the Habitats Directive, and suggested re-wording was put forward. *However, this is not confirmed by the HRA and therefore the suggested change is not required.*

### **Tidworth**

- There is some challenge by developers regarding the amount of development being proposed. They felt this was not commensurate with the settlements size and facilities and that growth should be located elsewhere. *The policy for Tidworth and Ludgershall has been developed over a number of years in consultation with local community. The level of growth and diversification of the economy will continue to form an important part of military civilian integration work and help form a sustainable community in the Tidworth community area..*

### **Tisbury**

- There was support for balance of housing directed towards Tisbury Community Area.
- A developer suggested that Hindon could potentially accommodate a higher level of planned housing growth than Fovant or Ludwell, and that a housing allocation should be identified at Hindon, and could include land adjacent to East Street.

- *Issues relating to Tisbury were recently examined as part of the South Wiltshire Core Strategy and no new evidence has arisen to depart from the Inspectors conclusions and the comments do not necessitate any changes to the core strategy.*

### **Trowbridge**

- A number of consultees, particularly residents, felt that too much development is planned on Greenfield land and that previously developed land (pdl) should be used first for housing not for commercial uses. *Pdl opportunities have been considered as part of the site selection process for Trowbridge. It is necessary to ensure there is a mix of uses for sites.*
- Residents, community groups and developers identified issues with a single strategic allocation, in an area of high flood risk and constrained by other environmental designations, is not the most appropriate spatial strategy for the community area. It was also suggested that there is insufficient flexibility to deliver a continuous supply of housing land in Trowbridge and that it would be better to identify a number of smaller strategic sites on the edge of the urban area, such as land at Church Lane. *Site selection evidence set out in topic paper 12 has led to the identification of a single strategic allocation. Regard has been had to constraints and the development templates include appropriate landscaping and mitigation measures to ensure.*
- A number of comments questioned the consideration given to the impact upon the strategic road network, particularly the A36, of development at Trowbridge. It was stated in the Transport Strategy that increases to the capacity of the Ashton Park junction can be satisfactorily carried out without creating fresh capacity problems at junctions immediately beyond. It was therefore suggested that the proposals are unsound in their present form and need to be reduced in scale to reflect the existing and proposed highways infrastructure capacity. *Trowbridge Transport Strategy work is ongoing and will include considering mitigation measures and improvements beyond the strategic site.*
- The development industry has noted that there is a qualitative need for convenience retail. *The evidence set out in the Topic Papers underpinning the retail policies has included both qualitative and quantitative assessment of retail needs. It is not considered necessary to identify specific sites. It is appropriate for this matter to be considered through the emerging Neighbourhood Planning process or other planning mechanism.*

### **Warminster**

- It was suggested that the wording of the paragraph and bullet points is not in line with the legal requirement of the Habitats Directive. *It is not considered that any change to the text is necessary as the Habitats Regulations Assessment supporting the Wiltshire Core Strategy shows the plan to be compliant with the EU Habitats Regulations.*
- Developers queried why a number of sites were not included in the strategic site. These included sites at 44-48 Bath Rd, land east of Dene and the existence of more sustainable locations, closer to Warminster town centre. *Topic paper 12 sets out the evidence supporting the West Warminster Strategic Extension to be the most appropriate site at Warminster.*
- A number of comments suggested that various types of infrastructure in Warminster, including roads, schools and water resources, will be unable to cope with the amount of development proposed. *It is not considered that any changes are necessary as the Infrastructure Delivery Plan and development proformas identify that either there is infrastructure capacity or where developers will be required to provide additional infrastructure.*

- A number of developers have suggested that the overall level of housing for Warminster is insufficient, and therefore, more will need to be identified. *The evidence to support the housing allocation is set out in topic paper 15, the figure for Warminster is considered robust and supported by evidence.*

### **Westbury**

- The major issue related to the strategic allocation at 'Land at Station Road, Westbury'. The developers have stated that the site is unviable with 250 houses because this will not deliver all the required infrastructure improvements. They argue that the number of houses should be increased to 500 and the site expanded to include other land within Persimmon's control on the other side of the railway line (around the Penleigh Farm area). *It is not considered appropriate to change the site at this stage as the expanded site does not have sufficient evidence and has not undergone any consultation. If appropriate, an expanded site could be taken forward through a neighbourhood plan or a site allocations development plan document in the future.*
- The other most requested changes involved the need for greater protection for the Wellhead Valley and the removal of Saved Policy T1a Westbury Bypass. *The Wellhead Valley is currently protected as a Special Landscape Area (SLA) under Saved Policy C3. There will be a review of SLAs to determine sites that should retain this protection.*

### **Wilton**

- *No significant issues were raised.*

## **2.8. Delivering the strategic objectives: core policies**

### **SO1: Delivering a thriving economy**

#### **Core policy 34: additional employment land**

- It was strongly recommended that criterion viii (to not undermine strategic sites) is removed from Core Policy 34 as there is no basis and other large sites may be needed for a flexible approach that responds to market demands. *This is not considered appropriate as it is important that proposals coming forward through this policy are not of such a scale that they undermine the overall employment strategy and important employment sites either allocated or identified as principal employment sites.*
- It was suggested that sustainable development should be judged against NPPF criteria of sustainability (and not the objectives set out in the core strategy, as indicated by criterion v). *The core strategy clearly defines sustainable development in a Wiltshire context as prescribed by the NPPF and this is the criteria that the policy should be assessed against.*
- AONB management teams and other respondents that Core Policy 34 (additional employment land) should make reference to AONB policy. *This is not considered necessary as criterion v clearly states that 'the proposal must meet sustainable development objectives as set out in the policies of this core strategy'. This includes meeting the requirements of CP51 (landscape) which makes specific reference to the AONBs.*
- It was suggested that the policy lacks clarity and that there is no definition of what 'within principal settlements' means as settlement boundaries reflect residential development and not economic development. *The settlement strategy that identifies principal settlements and has been informed by a range of evidence and data including evidence with respect to jobs. The settlement boundaries referred to are those set out in the current district/local plans.*



- Individuals felt that core policy 34 represents a ‘get out of jail free’ card for developers, and that the wording should be changed to stop developers putting forward repeated planning applications on employment land for other uses and could undermine the deliverability of strategic sites. *The aim of the policy is to provide flexibility to Wiltshire’s rural business community. Other forms of development will not be allowed if a planning permission for employment has not been built out.*
- A number of developers suggested that there is no clear guidance on how other DPD’s will address employment opportunities and thus the core strategy needs to provide this guidance. *This is felt unnecessary as the plan already contains flexibility to enable sites to come forward including through neighbourhood plans or a site specific allocations DPD.*
- Again a number of developers suggested that the plan needs to recognise that employment opportunities extend in uses well beyond those defined by Use Classes B1, B2 and B8. *Other forms of employment for example tourism uses are addressed through other policies of the core strategy.*
- It was suggested that Wiltshire Council should consult with other bodies e.g. local Chambers of Commerce, Town Councils etc as to what they consider to be the wider strategic interest of Wiltshire and where they should be sited. *A change to the policy is not considered necessary as the key target sectors have been identified in consultation with Wiltshire’s business community.*

#### **Core policy 35: existing employment sites**

- A number of individuals and local organisations thought that, as in urban areas, the significance of employment sites and their value for both economic and social roles is just as important within a rural community where allowance should be made for suitable expansion of employment sites that may serve individual or groups of villages in the local area. *The importance of the rural community is acknowledged through other policies of the Core Strategy including CP34 (additional employment land) and CP48 (supporting rural life).*
- Again it was suggested that the plan needs to recognise that employment opportunities extend in uses well beyond those defined by Use Classes B1, B2 and B8. *Other forms of employment for example tourism uses are addressed through other policies of the core strategy.*
- A parish considered a new paragraph 6.18 should be included: where there is a change of use of existing employment sites or re-adjustment to modern business needs, any change of use planning application must have regard to improving the green infrastructure of the site and location. *This is not considered necessary as Green Infrastructure is a requirement under Core Policy 52.*

#### **Core policy 36: economic regeneration**

- A developer raised concerns that there is no mechanism for promoting Brownfield sites outside the main settlements. *Although this is noted, Brownfield sites outside the main settlements should be considered against the rural policies of the core strategy or Core Policy 37.*

#### **Core policy 37: military establishments**

- The Defence Infrastructure Organisation, other agents and Corsham Town Council indicated that they feel the policy is overly restrictive and should be more permissive in terms of uses on a site and the expansion of the existing footprint. *The policy allows for such changes on well located sites and there is therefore no need to change the policy.*
- Other representations indicated that there should not be a specific policy for military sites and that sustainability issues have not been properly taken into account. *The policy is location specific and responds to an acute issue within Wiltshire. It is therefore considered that the policy should remain.*

**Core policy 38: retail and leisure**

- Property owners in Trowbridge suggested that the core strategy should define a Trowbridge Town Centre Boundary in line with NPPF requirements. *Saved Local Plan policies are currently in place, which set the context for the implementation of retail policy in Trowbridge. Saved policies will be reviewed.*

**Core Policy 39: Tourist development**

- It was queried as to whether a sequential assessment is necessary for all proposals for tourist development, or whether it would be better to only require such an assessment for major proposals. *It is not considered that a change to the policy would be appropriate. The policy clearly states where tourism development will be acceptable and of what scale. Tourism is defined as a town centre use and therefore should be subject to the sequential test, especially in Wiltshire's larger settlements, as set out in Core Policy 39.*

**Core policy 40: Hotels, bed and breakfasts, guest houses and conference facilities**

- Concern was raised about criterion (i) not being justified and being against competition policy. *It is considered that the policy is sound as written.*

**SO2: To address climate change**

**Core policy 41: sustainable construction and low carbon energy**

- There was some concern from an individual that the wording of Core Policy 41 is too weak in the section on climate change adaptation. *There is not sufficient evidence on viability to require development to comply with these measures, and an encouraging approach is therefore considered appropriate.*
- A large number of objections were received from the development industry in relation to the inclusion of requirements to meet certain levels of the Code for Sustainable Homes, and the statement that development of 500 units or more will be expected to be viable to meet zero-carbon standards from 2013 (Core Policy 41). *It is considered that the policy is fully justified and includes sufficient flexibility to take account of viability.*

**Core policy 42: standalone renewable energy installations**

- There were requests (including a request from Keevil Parish Council) for a minimum threshold distance of 2,000m between wind turbines and dwellings. *This is an issue which could be addressed through a future Supplementary Planning Document if the evidence indicates that a minimum threshold is required.*
- A concern was raised that further assessment is required to find out if ground conditions in Wiltshire may be vulnerable to climate change. *There is insufficient evidence in relation to ground conditions to make a change to the strategy at this stage. This issue could potentially be considered through a future planning policy document.*

**SO3: To provide everyone with access to a decent, affordable home**

**Core policy 43: providing affordable homes**

- A large number of developers have challenged the affordable housing target. Many feel that the affordable housing viability assessment is flawed. Reasons include:
  - Lack of developer involvement and no true examples.
  - Strategy needs to take account of individual site costs, the availability of public subsidy, S.106 requirements and other scheme costs.
  - 40% relates to numbers but means area in the study, thus even assuming all of site is developable land it should be nearer 30%.

*The affordable housing viability assessment is considered sound and no evidence was offered to alter this view.*

- Other proposed changes to the policy involved tightening up of the policy. It was suggested that more information is required on any approach to open book exercises, and that the policy should include information on acceptable profit margins. *A separate Supplementary Planning Document will be prepared that will cover these issues, and current best practice can be used in the interim period.*
- It was suggested that private landlords, parish councils and any other groups should be able to provide affordable housing. *National policy is clear that affordable housing is limited to registered providers, however that does not preclude the involvement in the delivery of affordable housing by these individuals/agencies.*

#### **Core policy 44: rural exceptions sites**

- Cotswold Conservation Board expressed concern that cross subsidy of these sites will become the norm, rather than the exception, increasing landowners' expectations of the value of such sites, resulting in cross subsidy being required. It was suggested that reference to cross subsidy should be removed. *Evidence indicates that cross subsidy of these sites is vital for their delivery and historic under delivery will only be alleviated through radical measures. The policy is sufficiently stringent to ensure cross subsidy of sites is enabled in exceptional circumstances only.*
- A number of developers thought that restricting the sites to 10 dwellings is unnecessary. *Developments of over 10 dwellings are defined as major development and 'exceptions' policies are not designed to support major development.*

#### **Core policy 45: meeting Wiltshire's housing need**

- It was contended that CP45 should allow greater flexibility for viability, and that the policy should also consider market demand and enable the market to determine type and mix. *The policy is considered robust and supported by the SHMA.*

#### **Core policy 46: meeting the needs of Wiltshire's vulnerable and older people**

- A number of providers objected to extra care homes needing to provide affordable homes. *Extra care is likely to increase and will be a significant part of Wiltshire's housing requirements in the future. As such it is necessary that affordable housing is provided at these sites to help support Wiltshire's most vulnerable residents.*

#### **Core policy 47: meeting the needs of Gypsies and Travellers**

- It was suggested that the basis of the targets should not be the caravan count, and that the policy should plan for a longer period. *In both cases no new evidence has been introduced to suggest that the current evidence is flawed, and therefore no changes have been proposed by officers in response to these comments.*

#### **SO4: Helping to build resilient communities**

- It was recommended that a reference should be included on the ability of new development to facilitate the protection and enhancement of services. *The settlement strategy already recognises the roles of Large and Small Villages and that some development at these locations supports those roles. It is not necessary to duplicate this information.*

#### **Core policy 48: supporting rural life**

- The NPPF removes the requirement to prioritise economic and tourist use first when re-using rural buildings and this should be reflected in CP48. *The NPPF does not preclude the prioritisation of the re-use of rural buildings for economic and tourist use first. The Core Strategy puts an emphasis on economic growth as a driving force for creating resilient communities in rural areas, and this is reflected in the prioritisation of the re-use of rural buildings for economic or tourist use first.*

- It was stated that CP48 omits reference of an abuse of the concession being grounds for refusing permission for the re-use of rural buildings that have been allowed through permitted development rights. *This can be dealt with through the development management system.*
- Various wording changes were recommended to reflect technical issues. *The plan is already considered sound without the suggested changes and the proposed amendments would not add anything to the clarity of the core strategy.*

#### **Core policy 49: protection of services and community facilities**

- It was recommended that protecting community facilities should also refer to urban areas. *This is not considered appropriate because the protection of community facilities is a particular issue in rural areas.*
- It was suggested that the policy is unsound because it fails to involve or mention local councils as elected community leaders. *This can be recognised outside the core strategy process.*
- Various wording changes were recommended to reflect technical issues. *The plan is already considered sound without the suggested changes and the proposed amendments would not add anything to the clarity of the core strategy.*

#### **SO5: Protecting and enhancing the natural, historic and built environment**

- It was suggested that a number of the policies in this section would be more appropriate as part of a Development Management DPD. *The policies are all deemed appropriate and justified for inclusion in the core strategy to help meet the objectives of the plan and the NPPF is supports move towards fewer planning documents.*

#### **Core policy 50: biodiversity and geodiversity**

- Concerns were raised that stronger protection of statutory sites is needed. *This is not considered necessary because protection for statutory sites is clearly set out in national policy and is referenced in the Core Strategy.*
- Bloor Homes raised a concern that CP50 lacks flexibility. *It is not necessary to restate the requirement of the Community Infrastructure Levy regulations which would be applied to any planning obligation, and the wording in relation to Special Protection Area mitigation needs to be worded strictly in order to meet regulatory requirements.*

#### **Core policy 51: landscape**

- Natural England raised a strong concern that the council has not demonstrated that it has adequately considered the impacts on designated landscapes in writing its policies, particularly in relation to the ability of AONBs to accommodate non-strategic growth, how the size of allocations has been adjusted to take account of the AONBs, and that the appraisal of strategic site options does not provide adequate information. *In regards to the strategic sites, the council's appraisal indicates that the sites can, in principle, deliver the required allocation without unacceptable impacts upon the AONBs. In regard to the other issues raised, a change has been proposed to the relevant area strategies to recognise the location within an AONB, and officers will seek to resolve any remaining issues through discussions with Natural England.*
- There was a suggestion that CP51 should include protection of agricultural land. *The NPPF sets out the approach to be taken in relation to best and most versatile agricultural land and it is not necessary to duplicate it in the Core Strategy. It was considered as part of the site selection process.*
- Concerns were raised about the need for CP51 to protect against coalescence. *It is considered that the spatial strategy set out in CP1 and CP2 already provides sufficient protection against coalescence in setting out how development will come forward.*

- A concern was raised that CP51 is not in conformity with the NPPF because it does not set out criteria against which proposals can be judged. *It is considered that the policy sets out eight criteria on which the landscape impacts of developments can be judged.*

**Core policy 52: Green infrastructure**

- The need for a comprehensive audit of sports facilities (in order to be in compliance with the NPPF) was highlighted. *A review of audit facilities is being carried out by the Council and can be considered through the core strategy review if appropriate.*

**Core policy 53: Wilts and Berks and Thames and Severn canals**

- It was suggested that the saved policies for the Kennet and Avon canal are out of date and CP53 should be expanded to cover the Kennet and Avon canal as well. *The Kennet and Avon canal's landscape and natural environment will be protected through CP50, 51 and 52. Further, detailed, policy on the Kennet and Avon canal could be provided through a review of saved Local Plan policies and the LDS if required.*
- Melksham Without Parish Council raised a concern about the loss of community facilities due to canal realignment (CP53) and requested a guarantee that facilities will be replaced elsewhere. *Wiltshire Council will not be financially responsible for providing alternative sites for community facilities, but will work with local communities and developers to identify alternatives. CP49 protects rural community facilities and services where necessary.*

**Core policy 54: Cotswold Water Park**

- No significant issues were raised in relation to CP54.

**Core policy 55: air quality**

- A concern was raised that Air Quality Action Plans are still outstanding for Wiltshire and that an Air Quality Strategy Implementation Plan is required as part of the Core Strategy. *The air quality strategy is being progressed through Environmental Health as is regulatory appropriate.*

**Core policy 56: contaminated land**

- No significant issues were raised in relation to CP56.

**Core policy 57: ensuring high quality design and place shaping**

- A concern was raised about the complexity of CP57, with thirteen different factors to be taken into account. *Design is considered an important factor to be considered within the core strategy and the level of complexity reflects the importance of this objective.*

**Core policy 58: ensuring the conservation of the historic environment**

- Concerns were raised that CP58 does not cover the setting of the World Heritage Site or the importance of maintaining the balance between the historic townscape and open and green space. *These issues are covered by CP59 and CP57 respectively.*
- A concern was raised that CP58 does not include a caveat as to whether or not exploitation of distinctive elements of the historic environment would be appropriate and sensitive. *The policy text states that these elements will be conserved and enhanced and proposals will therefore need to be appropriate and sensitive.*

**Core policy 59: The Stonehenge, Avebury and Associated Sites World Heritage Site and its setting**

- No significant issues were raised in relation to core policy 59 which haven't led to proposed changes.

## **SO6: To ensure that essential infrastructure is in place to support our communities**

### **Core policy 60: sustainable transport**

- Purton waste site is not most efficient or sustainable for transport and does accord with overall stated policy.
- Policies 60 & 66 both make reference to a Local Transport Plan large parts of which have still not been delivered.
- There was concern that the LTP is not complete and a number of strategies are outstanding.
- There was concern that improving journey time reliability is only achievable in the short term and conflicts with the sustainable transport aims.
- It was suggested that Core Policy 60 should also recognise that in relation to tourism uses, there is often no feasible alternative to the private car, for reaching more remote areas.
- It was suggested that the policy is too weak to tie in with stated objectives and deliver a major modal shift. Transport analysis should look at issues and options for buses, rail and integration of modes for the area. Introduce a policy for public transport rather than 'sustainable transport'.
- It was suggested that the policy should include the re-opening of railway stations.
- There was concern that the proposals for Chippenham are contrary to bullets iii. and vi.
- There was concern that the policy is more appropriate as part of a Development Management DPD.
- There was concern that restricting the amount of housing to address out commuting can severely limit funding for sustainable transport. Also need to consider locations with a reasonable chance that a bus service will be used by residents and that a service can continue after legal agreements have ceased.
- There was concern that the policy is not precise or meaningful in terms of its objectives, method or monitoring and is too vague to be convincing.
- There was agreement that developments should be located in the most sustainable locations, however, in applying this approach considerations should also be paid to the appropriateness of developing sites that will take advantage of employment, shopping and service facilities that may be located in adjoining authorities. In this respect the importance of Swindon to the eastern fringe of North Wiltshire cannot be ignored as by reason of its close proximity, size, combined with the existing level of employment and service opportunities mean it is already a significant centre.

*The consultation responses regarding the proposals for Core Policy 60 have not raised any issues or present any new evidence which would undermine the soundness of the Core Strategy. It continues to be the case that officers are of the opinion that the proposals within Core Policy 60 continue to be justified, effective and in accordance with the NPPF.*

### **Core policy 61: transport and development**

- There was concern that policy TR14 of Salisbury District Plan has been deleted without reference to the policy that allegedly replaces it. Policy TR14 or equivalent should be reinstated.
- The policy wording is not justified as does not refer to the reuse of buildings and therefore will not be effective. The wording does not comply with the provisions of NPPF.
- There was concern about the transport proposals at J16.
- The policy fails to address the layout of new development, which persists to be car based with distributor roads. Re-word policy to promote good walking and cycling environment etc.
- There was concern that the criteria ii. should include reference to safe access to the rail network as well as to the highway network.

- It may be more appropriate to provide offsite waiting than on site facilities to meet worst case scenarios, particularly for town centre locations where the quality of the public realm is the primary concern.
- Unsure of implications of this policy, particularly the operation of the hierarchy as set out in relation to fundamentally different needs, where meeting one level of the hierarchy does not necessarily have any impact on the needs to meet requirements for other levels.
- There was support for the objective to reduce the need to travel and encourage the use of sustainable transport alternatives. However, where a contribution is sought towards transport improvements it must be set out in a planning obligations DPD which is examined as part of the LDF process, and / or meet the tests of the CIL Regulations 2010
- There needs to be provision in the design of road layouts, especially in villages, for parking in front of villages facilities (such as shops and post offices).

*The consultation responses regarding the proposals for Core Policy 61 have not raised any issues or present any new evidence which would undermine the soundness of the Core Strategy. It continues to be the case that officers are of the opinion that the proposals within Core Policy 61 continue to be justified, effective and in accordance with the NPPF.*

#### **Core policy 62: development impacts on the transport network**

- Developers should be allowed to use contributions more flexibility to improve cycle and pedestrian networks beyond the development site.
- There was concern that the this policy appears to conflict with the proposals for Chippenham.
- In order to ensure the construction and operation of the transport network it will be appropriate to pool funding from a number of developments.

*The consultation responses regarding the proposals for Core Policy 62 have not raised any issues or present any new evidence which would undermine the soundness of the Core Strategy. It continues to be the case that officers are of the opinion that the proposals within Core Policy 62 continue to be justified, effective and in accordance with the NPPF.*

#### **Core policy 63: transport strategies**

- There was concern that the policy should not only relate to the principal towns, but should also relate to the market towns, and should include reference to improvements to rail transport

*The consultation responses regarding the proposals for Core Policy 63 have not raised any issues or present any new evidence which would undermine the soundness of the Core Strategy. It continues to be the case that officers are of the opinion that the proposals within Core Policy 63 continue to be justified, effective and in accordance with the NPPF.*

#### **Core policy 64: demand management**

- Standards should reflect needs of rural areas with poor public
- There was concern that business owners should not be compelled to charge for parking spaces.
- Concerned about the preference to use unallocated communal car parking. Car parking that is not attributed to and separated from an individual property could result in potential crime and community safety issues.

*The consultation responses regarding the proposals for Core Policy 64 have not raised any issues or present any new evidence which would undermine the soundness of the Core Strategy. It continues to be the case that officers are of the opinion that the proposals within Core Policy 64 continue to be justified, effective and in accordance with the NPPF.*

### **Core policy 65: movement of goods**

- Thingley Junction should be mentioned as an example of a site which should be safeguarded.
- There needs to be a modal shift towards getting more large volumes of freight on to rail and water transport.

*The consultation responses regarding the proposals for Core Policy 65 have not raised any issues or present any new evidence which would undermine the soundness of the Core Strategy. It continues to be the case that officers are of the opinion that the proposals within Core Policy 65 continue to be justified, effective and in accordance with the NPPF.*

### **Core policy 66: strategic transport network**

- There was a suggestion that Westbury railway station should be added to the list of stations to be improved.
- It was suggested that the options evaluated in SA are poor quality.
- There was concern that improving journey time reliability is only achievable in the short term and conflicts with the sustainable transport aims.
- It was suggested that Wiltshire and B&NES need to work together and take an integrated view of the options, benefits and problems associated with managing HGVs from Southampton to the M4
- There was concern that the description of the transwilts rail line is missing. Should mention joint working with West of England Partnership on transport
- The inclusion of Corsham railway station is welcomed.
- It was suggested that there should be a greater emphasis for the need for railway station at RWB especially in relation to developments at Lyneham.
- It was suggested that more detail about proposals should be in policy. Unhappy at pressure being exerted by Swindon from development and design.
- It was suggested that Westbury railway station should be added to the list of stations to be improved.
- The policy is more appropriate as part of a Development Management DPD,
- It is considered that the policy should be amended to make reference to the proposed access off the A350 to serve land at Showell Farm.
- There is concern that Melksham Station is being put in the same category as Corsham and Wootton Bassett even though the latter two towns do not actually have railway stations as yet.

*The consultation responses regarding the proposals for Core Policy 66 have not raised any issues or present any new evidence which would undermine the soundness of the Core Strategy. It continues to be the case that officers are of the opinion that the proposals within Core Policy 66 continue to be justified, effective and in accordance with the NPPF.*

### **Core policy 67: flood risk**

- It was suggested that there should be a general presumption in favour of locating all new development outside flood zones 2 and 3. *The approach to be taken to development within flood zones 2 and 3 is covered by national policy in the National Planning Policy Framework.*
- There was a suggestion that flooding should be viewed as part of a range of planning considerations rather than an absolute constraint. *As set out above, the approach to be taken to development in areas of flood risk is set out in national planning policy.*

### **Core policy 68: water resources**

- There was concern that core policy 68 does not offer the level of restraint required to limit over abstraction of the River Kennet catchment. *The local planning authority follows the advice of the licensing authority in regard to issues around abstraction, and no change to the policy is considered necessary.*



- It was suggested that the plan should reduce the projected housing and employment land quanta in order to ensure that water resources and natural systems are not compromised, and that the plan is not supported by evidence to prove that water supplies can be delivered to support growth. *The housing and employment quanta proposed in the core strategy are justified in topic paper 7 (economy) and topic paper 15 (housing requirement technical paper). The core strategy is supported by the Infrastructure Delivery Plan which has been informed by consultation with infrastructure providers, and which sets out the infrastructure required to support growth.*

**Core policy 69: protection of River Avon SAC**

- It was suggested that core policy 69 should provide the same level of protection to the River Kennet SSSI as that afforded to the River Avon SAC. *The policy is considered to be in conformity with the National Planning Policy Framework which states in paragraph 113 that “distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks”.*
- It was suggested that core policy 69 should be redrafted to fully comply with the rigour of the Habitats Directive and the requirements of the Appropriate Assessment regime. *The wording of this policy has been agreed with Natural England and no changes are considered to be necessary.*

2.9. Appendices

**Appendix A: development templates for strategic allocations**

- A concern was raised that the development templates have not been subject to formal public consultation. *The development templates have been prepared as a result of the site selection work and to ensure requirements from other policies are applied on a site by site basis. The information is not new information. Consultation carried out so far is sufficient.*
- The Core Strategy includes only a brief generic reference to instances where sites will affect heritage assets, including their setting, and features of archaeology of significance. This should be revised to reflect national planning policy more fully, particularly paragraphs 169 and 170 of the NPPF. *The development templates ensure that heritage assets and archaeological constraints are addressed through the masterplanning process.*
- Various minor changes were proposed to the development templates by developers promoting the sites. Others are considered unnecessary. The key issues which have been raised, which have not been resolved at this stage and which are considered to be key issues for discussion at the Core Strategy Inquiry stage are:
  - **North Chippenham Strategic Site** Accept that a suitably designed buffer is required, but there is no evidence or justification for 50m buffer. *Woodland management and education facilities are appropriate to be located within 50m. This requirement is in accordance with national guidance.*
  - **Rawlings Green Strategic Site** Remove reference to delivery of railway bridge in conjunction with North Chippenham site. Evidence gathered as part of Chippenham transport modelling work has indicated development will improve transport connectivity to the north of the town and also provide the opportunity to begin to put into place appropriate transport measures should further development be required further to the east of Chippenham beyond this plan period. *The Council remains of the opinion that the North Chippenham site should contribute to the delivery of a railway crossing in conjunction with the Rawlings Green, East Chippenham site.*

- **Land at West Warminster Strategic Site** Some responses including from Natural England have questioned the landscape capacity to accommodate development. *The site area is larger than that required to deliver 900 homes and 6ha employment and provides space for further mitigation if required.*
- **Drummond Park, Ludgershall** Outline Drummond Park planning application was designed on the basis that a future phase of development would come forward on the site to the west to provide future pedestrian and street linkages. This site should be reinstated as per the 2011 version of the CS. *Evidence for site selection is set out in Topic Paper 12. An extension to this site is not necessary. No change necessary.*

#### **Appendix B: list of topic papers**

- A small number of responses said that not all documents were available during the previous consultation (June to August, 2011) and that this consultation should be repeated. *However, things have moved on and the previous 2011 consultation was an additional, informal stage of consultation on the emerging core strategy and developing evidence base.*

#### **Appendix C: housing trajectory**

- A number of comments were received relating to the level of detail provided in the housing trajectory. *These comments have informed the proposed changes, and additional detail will be added where this is considered appropriate.*

#### **Appendix D: saved policies**

- A large number of responses were from Westbury residents, particularly those near the previously proposed bypass, that the T1a Westbury Bypass Package policy in the West Wiltshire Local Plan should not be saved. *The package needs to be saved as it is part of a wider policy, parts of which are still valid.*

#### **Appendix E: List of settlement boundaries retained and Appendix F: List of settlement boundaries removed**

- It was suggested that the proposed removal of settlement boundaries has not been communicated to the electorate in an active manner. *The proposal to remove settlement boundaries from Small Villages and those settlements not identified in the strategy was included in the June 2011 consultation document as well as the more recent pre-submission document. It is considered that the consultation process undertaken has been fully compliant with the regulations and the Wiltshire Council Statement of Community Involvement.*

#### **Appendix G: Principal Employment Areas**

- There was a suggestion that the Principal Employment Area at Southampton Road, Salisbury should reflect the existing employment provision and be extended accordingly. *The area identified in appendix G is considered to be appropriate.*

#### **Appendix H: Proposals map**

- A concern was raised that the proposals map wasn't available to comment on as part of the consultation. *Appendix H outlines what constitutes the proposals map for the core strategy.*