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 presubmission draft in response to comments received on the Wiltshire Core Strategy Pre-submission Document.
- The Wiltshire Core Strategy Pre-submission Document has incorporated the adopted 1.3 South Wiltshire Core Strategy. How consultation informed the preparation of that plan is documented at http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/southwiltshirecor estrategy.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 ¹
Number of organisations and individuals who responded	437 ²
Number of comments received	1787 ³
Number of workshops	4
Number of participants at workshops	129

Nature of respondents

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

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.

³ 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.

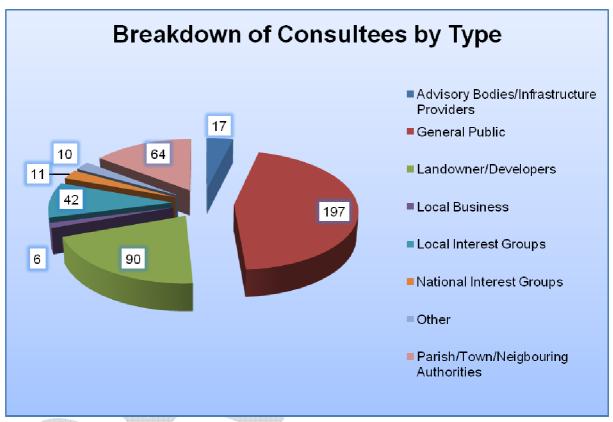


Figure 1: Breakdown of consultees by type

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.

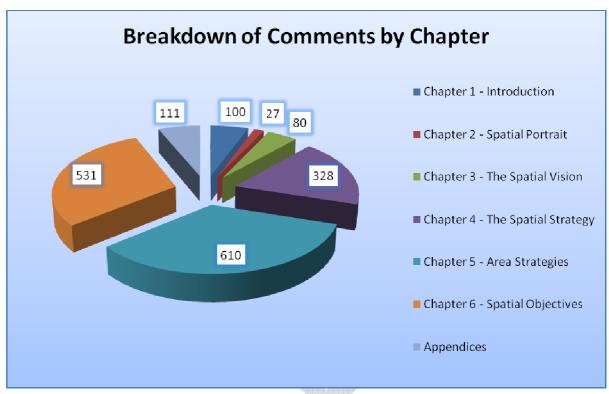


Figure 2: Breakdown of comments by chapter

- 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.

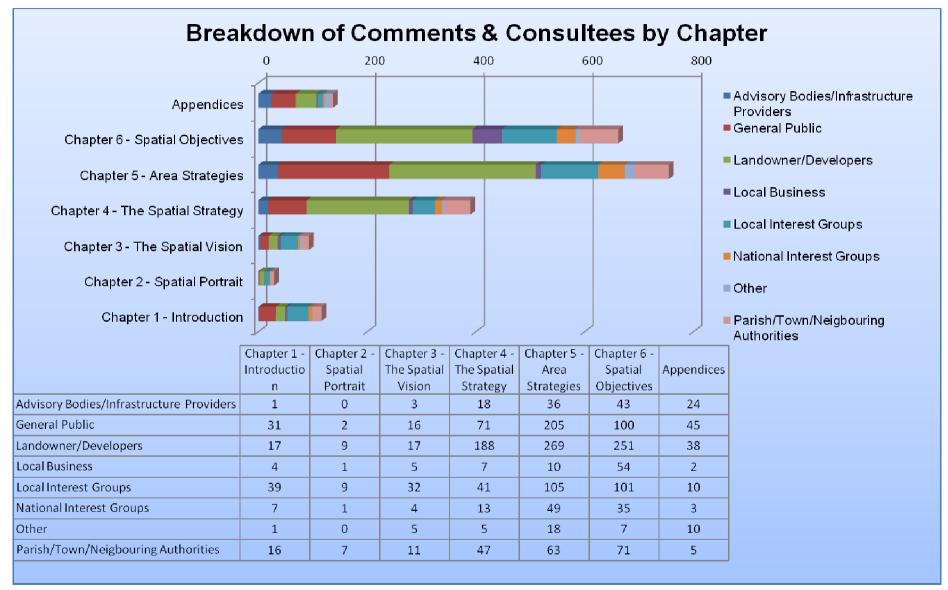


Figure 3: Breakdown of comments and consultees by chapter

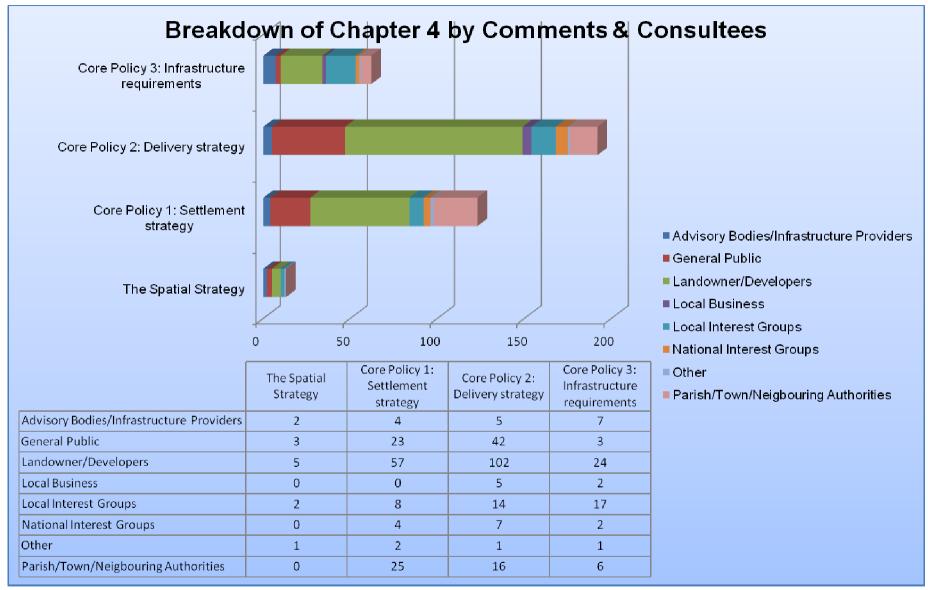


Figure 4: Breakdown of comments and consultees for chapter 4

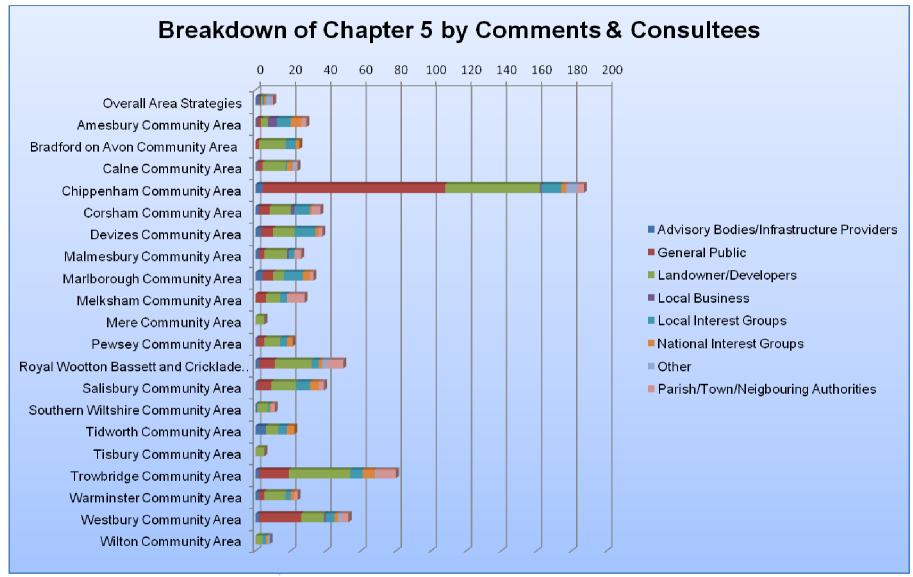


Figure 5: Breakdown of comments and consultees for chapter 5

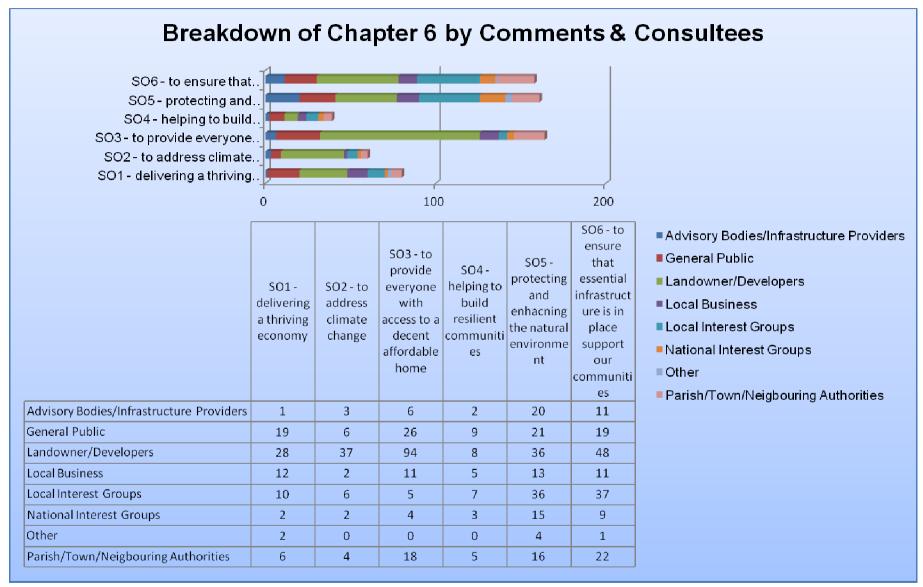


Figure 6: Breakdown of comments and consultees for chapter 6

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 portal⁴.

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

1: Introduction Concerns about the consultation process: More weight should be given to comments made Reponses published on the web site are often to simplistic or miss the point. Advice on how to comment misleading and non compliant with SCI Overly complex and uses too much jargon Objective (online system) not easy to use and expects comments to be submitted on single issues. Availability of documents at library and complexi of evidence. Complexity of consultation process. Availability of documents at library and complexi of evidence. Complexity of consultation process. Opinion divided as to whether Core Strategy is consiste with the National Planning Policy Framework (NPPF). Suggestion that council should reconsult to take account the NPPF.
 More weight should be given to comments made Reponses published on the web site are often to simplistic or miss the point. Advice on how to comment misleading and non compliant with SCI Overly complex and uses too much jargon Objective (online system) not easy to use and expects comments to be submitted on single issues. Availability of documents at library and complexi of evidence. Complexity of consultation process. Opinion divided as to whether Core Strategy is consiste with the National Planning Policy Framework (NPPF). Suggestion that council should reconsult to take account the NPPF.
 Need map to show town and parish boundaries and othe designations. Definition of sustainable development needed. Cannot force a more sustainable society on people by simply providing jobs and homes in the same location. Seek a referendum at Chippenham to properly reflect resident's wishes. Document in relation to Trowbridge doesn't properly refl public opinion. If development at West Ashton goes ahead, S106/CIL fit the site should be used for town centre regeneration. Strategy focuses on road corridors rather than urban regeneration. Targets for additional housing should be based on statis and trends and use a bottom up approach to assessment of local needs. How the SWCS has been merged into the WCS. Support for approach to landscape scale conservation. Diminishing water resources have not been taken into account. Role of other SPD, DPD, VDS and Village Plans. No recognition of the needs of faith groups.

⁴ The online consultation portal can be accessed at: http://consult.wiltshire.gov.uk/portal/spatial_planning/wcs/pre-subconsult2012?tab=list

	congestion and air quality. Overly ambitious.
2: Spatial Portrait	 Trying to reduce out commuting is the wrong strategy Superfast broadband is essential Wiltshire-wide Plan fails to adequately address water resources Additional 3000 houses should be reserved West of Swindon
3. Spatial Vision	 Widespread support The ambition and effectiveness of the climate change objectives were questioned There was strong representation that meeting places and places of worship should be referenced A number of requests to tighten up the key outcomes related to safeguarding landscapes especially the AONB and WHS. Housing numbers are too low to meet the objectives Housing numbers are too high to meet the objectives Strategic objective 1: Need higher education provision (including 16+) to match target sectors Support SO1 but concerned that approach is not carried through the strategy Location of Chippenham strategic sites does not agree with SO1 Not practical to suggest retail development will only come forward in town centres. Inconsistent with NPPF. Support for SO1 and particularly key outcome in relation to the tourism industry. Welcome for key outcome relating to redundant MOD land. Concern at removal of policy on rural diversification and enterprise which was included in earlier consultation document. Should recognise Swindon as important regional centre. Approach to prevent out commuting could have detrimental effect on economic growth. New retail provision should provide more effective choice and competition.
	 Lack of clarity over how the figure of 27,500 jobs and 178 ha employment land is arrived at.
4. Spatial Strategy: Core Policy 1 – Settlement Strategy	 Widespread support, but with minor changes proposed CP1 is inflexible and will constrain and stifle development, and is therefore contrary to NPPF Needs radical rethink of spatial strategy to be compliant with European Law No reference to Conservation Areas Approach to small villages is too restrictive and simplistic and is not specific enough about when development is acceptable

	Concern about how policy could be interpreted around
	settlement boundaries
	 Village policy limits should be retained for small villages
	 Settlement boundaries are out of date and should be
	expanded/reviewed
	Strong support for Trowbridge and Salisbury being
	identified as Principal Settlements; some support for
	Chippenham, but also a number of objections.
	 Number of suggestions for changes to designations of the
	other settlements
	CP1 does not recognise cross border relationships; should
	include a 'West of Swindon' category.
4. Spatial	Plan period should be extended to cover 15 years; housing
Strategy: Core	and employment requirements should be increased
Policy 2 –	accordingly.
Delivery Strategy	Housing requirement should be increased:
	Not sufficiently flexible
	 Does not plan for specific uncertainties (capacity of
	J16, closure of RAF Lyneham)
	 Contrary to the NPPF
	 Projections used do not accord to high economic
	growth scenario
	 Should accord with latest CLG household
	projections
	 Will worsen affordability of homes
	 Does not accord with SHMA
	 Does not accord with SA
	 Will not meet sub-regional requirement, as
A	neighbouring authorities have also reduced housing
	requirements
	 Overly restrictive and does not encompass the
	presumption in favour of sustainable development
	 Should reflect RSS
	 Methodology is not transparent
	 Assumes a change in people's behaviour
	 Does not reflect SHLAA.
	Housing requirement should be decreased:
	 Infrastructure already over-burdened
	 No justification
	 Has been maintained from RSS and is based on
	out-of-date models
	 Population growth should be managed by
	Government
	 Based on shaky demographic and migration
	assumptions
	 Insufficient water resources.
	General support for the housing requirement from 5
	respondents
	Concerns about the distribution of housing:
	Housing Market Areas are arbitrary
	 Community Area and settlement housing targets
	are too prescriptive
	Former district boundaries should be used Padvetion from DSS targets have not been applied.
	 Reduction from RSS targets has not been applied

consistently across Wiltshire

- Should be mechanism to ensure housing and jobs are delivered in parallel
- 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.
- Employment requirement:
 - This should be a minimum
 - Employment land should be of the right type and in the right location
 - Sites outside the main settlements should be supported
 - Need to ensure that population have sufficient skills to support new employment delivery
 - Should prioritise release of strategic employment land
- Brownfield development:
 - Mix of views as to whether brownfield sites should be prioritised.
 - Brownfield development outside settlement frameworks should be permissible if more sustainable.
 - Brownfield target should be increased.
 - No need for Brownfield target.
 - Should be mechanism to ensure Brownfield target is achieved.
- Location of development:
 - Community led plans should be able to identify development adjacent to small villages
 - Parish Plans and Village Design Statements should be included as sources of supply
 - Small, sustainable developments should be allowed outside limits of development
- Delivery of development:
 - Further detail needed on how and when site allocations DPD will be prepared
 - Additional sites should be included as strategic sites
 - Community led plans should not be relied upon to deliver
- Duty to co-operate should be evidenced
- Masterplans should provide sufficient flexibility
- Should be a requirement for places of worship.
- 4. Spatial Strategy: Core Policy 3 – Infrastructure

Requirements

- Viability assessment is only necessary for development proposals where there is a dispute over viability
- Viability of the Core Strategy should be reviewed in line with the NPPF
- Prioritisation:
 - Meeting halls and places of worship should be included as 'place-shaping' infrastructure
 - Suggestions to changes to lists of essential and place-shaping infrastructure
 - o Full definition of 'essential' and 'place-shaping'

- infrastructure should be provided
- Current methodology is too generally applied across Wiltshire
- Developer contributions:
 - Contributions should not be required prior to development, and should be provided in stages
 - o Should clarify that there is no 'claw-back' principle
 - CP3 should recognise that some payments may not be capable of being made.
 - Planning permission should be deferred rather than deferring contributions
- Community Infrastructure Levy:
 - Community should decide how CIL is spent for substantial developments, and the council should liaise directly with town and parish councils over CIL
 - Request for firmer indication of the CIL to be set, and IDP to be costed
 - Guidance note on planning obligations and CIL should be in place as part of Core Strategy
 - CIL should be used for site-specific infrastructure or within the local area
- Planning obligations should be subject to tests set out in the CIL Regulations 2010
- Should clarify position in relation to planning obligations post-2014
- Omissions:
 - State what priority will be given to affordable housing
 - More detail on emergency fire and rescue service
 - Should refer to water and sewerage infrastructure
 - Should mention off-setting and biodiversity/eco system loss compensation mechanisms
 - Need definition of sustainable transport
- Need clearer delivery strategy
- South Wiltshire Core Strategy should be re-examined in terms of making best use of existing infrastructure
- Should make better use of existing infrastructure
- Review strategic allocations in light of provision of on- and off-site contributions to sport facilities.

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.

5. Area Strategies (introductory text)

- Overall level of growth:
 - Housing and employment land quanta are too high and not supported by robust and credible evidence base. Growth projections should be revised downwards.
 - Contingency sites should be added to the plan to address potential underperformance in delivery of housing during the early plan period.
- The Plan must take a consistent and coherent approach to

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. Impact on designated landscapes: Proposals will lead to unacceptable impacts on the North Wessex Downs AONB. 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. Suggestions made in relation to more than one community area included: The plan period should be extended to 2028 The statement about the master planning process should be clarified The text should be amended to clarify that housing and employment figures are minimum targets The final paragraph of CP7 should be deleted: it would be better suited to supporting text. Amesbury Area Need clarification as to which of the three 'Gomeldons' Strategy settlements are identified as a small village. Concern that evidence base supporting changes to Amesbury is limited through reliance on previous planning effort focused on Salisbury. Housing sought in Kings Gate area may require balancing growth in retail, road, education and leisure facilities. Principal Employment Areas should be shown on the proposals map. Previous local plan employment allocation at Solstice Park should be saved. 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. Reference to Stonehenge in paragraph 5.15 is both misleading and incorrect. Suggested changes to text. 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. 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. Bradford on Avon Should recognise importance of AONB Area Strategy Should recognise distinctive neighbourhoods Development should be phased to the end of the plan period Level of growth proposed is the most that Bradford can withstand Housing and employment allocations at Bradford on Avon should be increased Should identify another site in BoA to deliver the residual housing requirement

- Cycle path between BoA and Holt should be provided
- Kingston Farm:
 - Employment element is exaggerated
 - Benefits of existing large trees should be recognised
 - Will lead to urbanisation of Holt side of BoA
 - Development should have little parking provision
 - 2-3ha employment land not likely to be delivered:
 5,000 sq m will be delivered
 - Green space shown adjacent to the site is not available and will remain in agricultural use
 - Statement about master planning process is unclear
 - Not the most appropriate site when considered against alternatives
 - Site does not have capacity to deliver the entire proposal
 - Ecology, archaeology/cultural heritage, and landscape are constraints
 - SA should be revisited
- Alternative sites:
 - Land North of Holt Road
 - Land at Bradford on Avon Golf Course
- Air quality, transport and Historic Core Zone:
 - More serious consideration of AQMA needed
 - Question as to how congestion will be reduced
 - Question as to how Historic Core Zone will be delivered
 - Concern at impact of Bath HGV ban
- Bath and Bradford on Avon SAC
 - Policies for community area and environmental protection need to be rewritten in light of SAC
 - Need Appropriate Assessment of Kingston Farm site
- Holt area of opportunity: an alternative area of opportunity should be identified.

Calne Area Strategy

- Calne Town Council support the strategy for the area
- Housing requirement should be increased
- Housing target should allow for additional development where there is a shortfall elsewhere
- Settlement boundary of Calne should be redefined to include land at Castle Walk
- Should identify site for care and older people's accommodation
- Strategic allocation should be identified in Calne
- Suggested allocations:
 - Land to north east including land at High Penn
 - Land off Oxford Road
- Support omission of land east of Chippenham as strategic site – should become rural buffer
- Should recognise that development outside B1/B2/B8 can provide significant number of jobs
- Qualitative need for convenience retail in Calne
- Support for references to AONB

	Aspirations to create entertainment and recreational
	facilities
	Development should be high quality design
	Support for not bringing forward eastern distributor road
Chippenham	Housing requirement:
Area Strategy	 Maximum housing requirement should be 1500
	 Referendum should be taken on levels of
	development
	 Should be made clear that there will be a need to
	release Greenfield land to deliver houses outside
	Chippenham
	 Insufficient housing requirement in Chippenham
	Community Area
	Spatial Strategy:
	 Too much emphasis given to early employment
	delivery
	 Should not require employment development in
	advance of residential.
	 Spatial Strategy is not ambitious enough to attract
	inward investment and does not provide a flexible
	supply of strategic employment sites
	 Should refer to potential impacts of development at
	Chippenham on Lacock
	Lack of consultation with Lacock Parish Council Taggraphic for Chinage have
	regarding proposals for Chippenham o Grittleton should be identified as a small settlement
	 Grittleton should be identified as a small settlement Sites:
	 Showell Farm Employment Site isn't viable
	 East Chippenham Site should be allocated for 800
	dwellings.
	 Object to inclusion of 18ha employment land at
	Showell Farm and 800 dwellings at
	Patterdown/Rowden
	 Alternative sites (e.g. J17) dismissed too easily
	 Support for allocation of North Chippenham and
	Rawlings Green sites. Remaining 800 dwellings
	should be identified through NP/Chippenham
	masterplan.
	 Object to allocation of North Chippenham and
	impact on Birds Marsh Wood
	 Support for non-identification of East Chippenham
	site – should be designated as local Green Space
	 Rawlings Green proposals not supported by local
	community
	Constraints to development of Rawlings Green
	currently unknown.
	Hunters Moon site should be reinstated as an allocation for ampleyment and 650 begans.
	allocation for employment and 650 houses. Saltersford Lane should be reinstated.
	Barrell Francisco III and Barrell Grand and and
	 Forest Farm should be allocated for 2.5ha employment land and 700 houses.
	 Suitable alternatives for provision of employment
	sites have not been suitably considered.
	Siles have not been suitably considered.

- Support South Chippenham allocation.
- CP10 does not comply with NPPF. Need more jobs around the town centre rather than near the A350.
- Changes should be made to indicative greenspace areas for Rawlings Green.
- Change land identified by Natural England as being more visually prominent to indicative greenspace at South West Strategic Site.
- Land at SW Abbeyfield School is non-strategic site and should not be allocated in Core Strategy.
- Development is allocated in Rowden Conservation Area, which is an open rural landscape.
- Brownfield opportunities:
 - Lack of consideration of brownfield opportunities, contrary to NPPF
 - Langley Park is not being used to full potential
 - SHLAA notes potential for 545 houses
- Proposed development is contrary to NPPF
- Chippenham Central Area of Opportunity
 - Support for inclusion of Langley Park/Hathaway
 Park in CP9
 - Support for Chippenham Central Area Masterplan
 - Wiltshire College Site should be identified as part of Central Area of Opportunity
 - Support for inclusion of Bath Road Car Park/Bridge Centre site; request for council to consider other uses such as A3
- Transport Strategy
 - Concern over lack of transport strategy to inform Core Strategy – more detailed transport strategy needed for Chippenham

Corsham Area Strategy

- Chippenham South East Site is not properly referenced in the text: numbers and text for Cosham Community Area therefore misleading
- Need to maintain open countryside between Corsham and Chippenham
- Policy should provide greater scope for permitting development outside settlement boundaries
- MoD land & alternative sites:
 - Sites should be identified for remaining 475 houses or 6 ha employment land
 - Policy should provide greater control over redevelopment of existing employment sites, including MOD land
 - Support for policies in relation to Copenacre. Town Council would support a larger footprint on Copenacre and Rudloe site.
 - Question deletion of strategic site on land west of Corsham.
 - No evidence of deliverability of future employment provision – risk existing employment sites are lost to housing
 - Fails to identify sufficient specific employment sites
 - Fails to deliver development on MoD land

 10 ha Sands Quarry site should be allocated for employment, green buffer and recreation Land to north and east of Leafield Industrial Estate should be allocated in the plan Transport: Support re-opening station; should be top priority Support strategy to improve worker retention and emphasis on improved facilities and services Not correct that transport is generally poor: A4 should be recognised as positive feature Corsham Cycle network and greencorridor between Chippenham and Corsham not likely to be delivered Qualitative need for additional convenience retail floorspace in Corsham in line with NPPF 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 Support taking account of Bath and Bradford-on-Avon
SAC.
 Support for aspiration for railway station Support for production of Devizes Town Transport Strategy Support for retention of existing development boundaries Housing: Housing target should be increased Increase housing requirement in Devizes rural area Allocate land at Coate Bridge for mixed use including 350 homes Allocate land at Lay Wood/Horton Road for 350 homes Lack of 5 year housing land supply in Eastern HMA Wider heritage assets in Devizes than the Wharf and Assize courts Devizes Hospital should no longer be viewed as potential housing site Status of Worton Objection to Horton Road employment allocation Prioritise addressing traffic congestion, reducing air pollution and need for improved health care Description of Devizes is overly optimistic.
 Definition of Malmesbury Community Area is required – currently separate boundaries for Malmesbury, Burton Hill and Cowbridge and Foxley Road Housing: Housing numbers should not be set or delivered until school places addressed Housing targets should be increased to meet housing need and needs of employers Other centres have a lower percentage increase in housing No evidence to support increased amount of housing for Malmesbury No clear evidence as to how allocation of housing has been derived

- Should make it clear that delivery outside the main town will involve release of Greenfield sites
- Comments on previous consultations have not been taken into account
- Land at Park Road should be allocated for development.
- Employment and retail:
 - Employment allocation at the Garden Centre should be removed
 - CP13 should refer to need for a town centre study to determine appropriate scale of supermarket development.
 - Malmesbury does not need another supermarket.
- Transport:
 - Need to consider transport impacts and increased pressure on M4 J17
 - No mention of how public transport might be improved
- Villages:
 - Should allow small sites on the edge of Oaksey/large villages
 - Support designation of Oaksey and Great Somerford as Large Villages

Marlborough Area Strategy

AONB:

- Should make clear that AONB is starting point of any strategy in the community area
- Concerns that AONB has not influenced level and location of proposed development
- River network:
 - Importance of River Kennet should be stated
 - 'Sustainability' should be defined in relation to River Kennet and Og Rivers
 - Serious concerns over environmental capacity of Marlborough environment, particularly upper River Kennet
- Salisbury Road strategic site allocation:
 - Support for allocation
 - Development template overly prescriptive and premature
 - Number of houses should be reduced and provision for a hotel included
 - 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
- Air pollution problem should be recognised
- Housing should be phased: infrastructure and employment should come forward before residential
- Importance of tourism should be recognised
- Term 'Outstanding Universal Value' is confusing
- Development should be promoted in sustainable locations, with consideration to impacts upon M4
- Should acknowledge presence of bats in disused rail

	tunnel.
Melksham Area Strategy	 Concern at scale of development: infrastructure will be overwhelmed
	 Appears to be preference for development on green field sites to the east of Melksham
	Rural buffer between Melksham and Bowerhill should be
	protected/made available as Community Park
	 Potential impact of development on Lacock should be recognised
	 Should specify that non-strategic development will consist of 2-3 sites of no more than 30-35 housing units
	 Should recognise role of town and parish councils in delivering CP15
	Should be no further large scale building in Bowerhill area.
	Bowerhill Sports Field should be retained
	CP15 does not cover economic and social needs of the villages: rural industry in the villages should be encouraged
	 Cycle linkages needed between town centre and surrounding villages
	 Support for protection of historic environment of the Spa:
	 should be designated as a Conservation Area Listed building in the villages should also be protected and
	enhanced
	Wiltshire Council need to pro-actively secure a better rail
	service
	 Housing and employment development will not in itself improve the retail area
_	Core Strategy should protect riverside amenity from tree-
	felling
	Settlement hierarchy and villages:
	 Seend, Seend Cleeve, Inmarsh and Sells Green should be treated as one settlement.
	 Bowerhill should be classified as a separate
	settlement (Large Village or Local Strategic Centre)
	Inaccuracies in settlement strategy assessment of
	Seend Cleeve Great Hinton should be identified as a Small Village
	Land north of Shaw and Whitley presents
	opportunity to deliver housing and community
	facilities Remainder sites for the villages should be agreed
	through Neighbourhood Plans, not just windfall sites
	 Should allow for more retail in Bowerhill village
	Employment:
	 Support for regeneration of Bowerhill Industrial Estate
	 Disagreement with use of old running track land for
	waste transfer station
	A Business Development Brief should be prepared to determine the good extent of complete extent
	to determine type and extent of employment required
	 Upside Park should be excluded from list of
	Principal Employment Areas
	 Bowerhill employment area serves a wider area

	(1
	than Melksham town
	Need car/lorry park at Bowerhill IE Heritage centre could be provided an employment.
	 Heritage centre could be provided on employment land at Bowerhill
	19114 91 - 2 11 2 11 11
	 Lack of strategic site: Concern that lack of strategic site will leave town
	vulnerable to developers
	 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
	 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)
	 Land east of Melksham should be allocated for 400-
	450 dwellings
	Joined up thinking is required between Melksham and Transhind a community areas.
	Trowbridge community areasErrors on Melksham map need to be rectified
	 Housing and employment numbers:
	 Housing numbers for rural settlements are too low
	Housing numbers for whole community area should
	be increased
	 Too many houses are allocated in the community
	area
	 Housing numbers for Melksham town should be
	decreased, and numbers for villages increased
	 Figures for Bowerhill should not be included with
	Melksham town
	 Canal project offers opportunity to provide walking and cycling links to the villages
Mere Area	General support for CP17
Strategy	• General support for CP17
Pewsey Area	AONB:
Strategy	No alternative approach has been suggested within
3,	the Core Strategy for land inside the AONB
	 Questions as to how level of development will be
	achieved without harm to the AONB – justification
	for level of development needs to be explained
	Within AONB development should be prioritised on
	brownfield land first, within the settlement boundary
	Support for settlement strategy but housing allocation for
	community area is insufficient
	 Increased recreational pressure should be avoided where it may impact on European habitats and species
	Housing:
	Housing numbers are too high
	 CP18 should make it clear that delivery of housing
	will involve Greenfield sites
	 Should provide guidance on level of growth
	expected in Pewsey
	 Majority of dwellings in the community area should
L	- majorny or arrange in the community error crossing

	be focussed on Pewsey
	 Housing development in Pewsey should be phased
	for delivery throughout the plan period
	 CP18 should allocate a strategic site at Pewsey
	Pewsey currently delivers insufficient housing
D 114/ //	Support identification of Burbage as a Large Village
Royal Wootton	West of Swindon:
Bassett and	 Strategic sites should be allocated at Washpool,
Cricklade Area	Ridgeway Farm, Marsh Farm
Strategy	 Development should be permitted to the west of Swindon due to need for Swindon to expand
	Follow (DACHOLIC) and Control of the other control of
	on this issue
	 Need for joint EiP for Wiltshire and Swindon
	RSS is still part of development plan
	 Opposition to development west of Swindon due to
	need to preserve identity of settlements
	 Should bring back rural buffer
	Strategic site should be allocated at Brynard's Hill
	Strategic site should be allocated at land south of Wootton
	Bassett
	 Support for no strategic housing allocation in the area
	 Support for statement about J16
	 Housing requirement should be increased:
	 Inadequate to meet need
	 Should use RSS
	 CS does not adequately account for likely delivery
	problems
A	Lyneham will create need Need for continuous villaviibility
	 Need for contingency/flexibility Moredon Bridge development reflects Swindon's
	need and should not come out of Wiltshire housing
	figures
	 Not enough houses for likely jobs
	Transport:
	 J16 congestion problems: should developers pay
	for improvements? Will improvements adversely
	impact on local roads
	 HGVs and traffic are major issues in Cricklade and
	Purton
	 Need to promote sustainable transport
	RAF Lyneham:
	 Question as to whether village boundary review will
	be separate to any masterplan for the base
	 Development at Lyneham could have negative
	impact on roads
	Jobs should be created before more houses are built Despecial of the property and the property of the pr
	Proposed changes to settlement hierarchy status of Criefled Protect Lynchem and Lydiard Milliaget
	Cricklade, Purton, Lyneham and Lydiard Millicent
	Sustainability is not clearly defined Provintial about he prioritized over Croenfield
	Brownfield should be prioritised over Greenfield Detail accomment should be qualifative as well as
	Retail assessment should be qualitative as well as quantitative.
	quantitative
	Should be more than 30% affordable housing

	 Question as to why major development should support changes to infrastructure
	Question as to how development will fund infrastructure
Salisbury Area Strategy	Radical transport options as identified by the Inspector need to be added (agreed)
	 Too much development in Laverstock and Ford Parish Core Policy 23 should be deleted
	Plan period should be extended
	Support for Maltings/CCP redevelopment
Southern	Developers proposing to connect to a Waste Water
Wiltshire Area	Treatment Works will need to check with the utilities
Strategy	provider that there is adequate capacity.
	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.
	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.
Tidworth Area	Housing requirement:
Strategy	 Housing development should be phased for delivery throughout the plan period
	 Requirement is not commensurate with settlement size or function: services, facilities and employment opportunities at Tidworth and Ludgershall are extremely limited Development at Zouch Manor farm should be
	included as part of supply
	 Support for allocation at Drummond Park. Should be a development template at appendix A.
	Proposals do not strictly follow the requirement of the Habitats Directive
	Development of Brownfield should consider risks from
	contamination to ground and surface waters
	Support for references to AONB
	 Support for solutions to limit impact of development on A303
	Issues and considerations not in line with Habitats
W	Directive: increased recreational pressure should be
	avoided where it may impact on European protected
	habitats and species
	Need to consider foul and surface water disposal and a
Tichury Aros	water cycle study as part of infrastructure requirements
Tisbury Area Strategy	 Support for balance of housing directed towards Tisbury Community Area
	Hindon could potentially accommodate a higher level of
	planned housing growth than Fovant or Ludwell
	 Housing allocation should be identified at Hindon, and could include land adjacent to East Street.

Trowbridge Area Strategy

- Trowbridge town centre:
 - Town centre better suited to community starter housing not another supermarket.
 - Does not sufficiently prioritise town centre. No assurance central area will be delivered before Ashton Park.
 - Support objective for proposed urban extension to be fully integrated with the town centre.
 - 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.
 - Area described as the 'town centre' needs to be properly defined.
- No long term vision for Canal Road Estate. Need to improve B3105.
- Too much development planned on Greenfield land: Brownfield should be developed first for housing not commercial uses.
- Insufficient emphasis on giving priority to brown field sites, which leaves vulnerable to a redundant and crumbling town centre.
- Housing and employment figures are excessive and out of balance.
- Some concerns with traffic on B3105 and overall level of development.
- More proactive approach needed to stop heavy goods vehicle using Trowbridge as a route to M4.
- Suggestions for rewording of the vision statement within the area strategy.
- CP28 should include reference to aspirations to create leisure, entertainment and cultural faculties.
- There is qualitative need for additional convenience floor space in Trowbridge in line with NPPF requirements.
- Strategic site:
 - Should consider impact on strategic road network, particularly A36
 - Should change map to reflect correct site area.
 - Proposals are unsound and need to be reduced in scale to reflect the existing and proposed highways infrastructure capacity.
 - 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.
- Bowyers site presents best opportunity for district heating system and is ideally located for retail and leisure development.
- Ecology:
 - Important wood south east of Trowbridge to be preserved.
 - Trowbridge needs trees.

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	 Settlement hierarchy: Yarnbrook should not be re-classed as a small village but remain a settlement in the countryside. Support for identification of Southwick as a large village. Welcome fact that Hilperton is now classed as a large village, thereby reinstating Village Policy Limit. West Ashton would like to remain a small village however would like to retain its existing policy limit. Strategic role given to Trowbridge is supported.
Warminster Area Strategy	 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. Reference to fire station and ambulance service centre should be amended Support for proposed mix of development Alarmed by proposed development Need to consider traffic impacts on A36 Question as to why land at 44-48 Bath Road is not included in the strategic site area Not enough jobs to support new housing Not enough school spaces and amenities Infrastructure will struggle Chapmanslade should be identified as a Small Village (not a Large Village) Any development is likely to add to climate change There should be more specific criteria associated with the development Support location of strategic site and flexible approach to meeting Phosphates Management Plan Master planning approach will build in delay Flexible approach should be taken to affordable housing Direct relationship between employment and housing should be built into CP31 Housing allocation should be increased and SA re-visited. Land to east of Dene should be identified for 320 dwellings. Object to strategic site and leave allocation to NP or site allocations DPD. Alternatively, lower the number of houses. Overall level of housing for Warminster is insufficient. Promotion of land which was previously white belt, before becoming green belt. Land north of Grovelands Way should be included as part of the urban extension. The West Wiltshire Urban Extension is capable of accommodating a much higher number. The overall requirement for the site should be reassessed.
	 Land south of Bugley Barton Farm is not essential to the delivery of the majority of the site.
Westbury Area Strategy	Housing: Housing requirement for Westbury is too low to

deliver infrastructure requirements Scale of housing growth should not be determined by the need to balance the high level of housing in the past Alternative sites promoted for allocation: Land to the East of Newtown (residential) North of Westbury (mixed-use) Land at Station Road allocation: Site will impact negatively on use of the lake for sailing and angling Site is capable of delivering 500 homes: this higher number is necessary to deliver infrastructure requirements and public realm improvements Site should be expanded to included associated land Access to the station is an issue for buses: could be dealt with through the strategic site
dealt with through the strategic site
 Employment: Employment in Westbury should be considered in
line with Trowbridge
Land at Mill Lane, Hawkeridge strategic site:
 Employment requirement for Westbury should be lower and Mill Lane, Hawkeridge site is
unnecessary
 Enough employment land in Westbury and road
network cannot accommodate additional traffic from
proposed site o Support inclusion of Mill Lane, Hawkeridge site
Landscape/environment:
 Should be firm and robust protection for Wellhead
Valley ○ All species and habitats, not just Stone Curlews,
 All species and nabitats, not just Stone Curiews, should be protected in vicinity of SPA/SAC to be in
conformity with Habitats Directive
Area unsuitable for development because of water aupply and natural history concerns.
supply and natural history concerns Areas of Green Belt should be identified around
Westbury
Lafarge Cement Site
 Lafarge site should retain rail sidings Lafarge site should be designated as Principal
 Lafarge site should be designated as Principal Employment Area
 Only suitable use for Lafarge site is agricultural
Westbury Bypass
 Remove saved policy T1a, Westbury Bypass Council's intentions regarding the bypass should be
o Council's intentions regarding the bypass should be made clear
HGVs are a problem in Wesbury
Wilton Area • Provide employment to cater for Wilton residents rather
Strategy than placing it in Salisbury
 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.

Delivering SO1: CP34 – Additional employment land

- Support for reference in para. 6.2 to 'targeting growth in the tourism sector' but text should be expanded.
- Salisbury Plain should be specified as a tourist attraction in para. 6.3.
- Need a new policy and key outcome which promotes browndfield sites in town centres as priority places for development.
- Need more emphasis on the need to develop brownfield sites before Greenfield. The council should maintain a list of all suitable brownfield sites.
- NPPF section on town centre vitality should be expressed in the Core Strategy: should promote Trowbridge town sites much more strongly.
- Support for recognition that employment sites may come forward which do not strictly meet policy but are of strategic significance.
- Policy should recognise that employment sites not adjacent to current boundaries may be needed.
- Policy does not allow for land adjacent to market towns, and thus potential Greenfield employment sites could be excluded.
- Para. 6.13 is inconsistent with much of the CS and NPPF and should be deleted.
- Suggested changes to text of CP34:
 - Need to clarify whether rural employment (criterion iii) refers to type or location.
 - Criterion iv should be reworded to cover sites that are able to demonstrate that they promote the move towards a higher-value economy
 - Criterion iv: 'are considered essential' is too narrow
 should replace with 'are considered beneficial'
 - Criterion relating to sites essential to wider strategic interest (iv) is too ambiguous and should be removed.
 - Criterion v should be reworded to refer to the NPPF.
 - 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.
 - Strongly recommended that criterion viii (relating to strategic employment allocations) is removed
 - Criterion viii will be complex to implement through development management: should only relate to sites of more than 1ha.
 - '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.
 - CP34 should make reference to AONB policy.
 - Wording of CP34 should be changed to stop developers putting forward repeated applications on land that has already been assessed and could

- undermine deliverability of strategic sites.
- 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.
- 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.
- 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.
- Should clarify that employment land will only be supported outside the settlements in exceptional circumstances.
- Policy lacks clarity: no definition of what 'within principal settlements' means as settlement boundaries reflect residential development and not economic development.
- Given that much of the county do not have strategic allocations it is important that other policies allow for economic growth.
- Need to support small businesses within the rural areas: this note seems somewhat reluctant and negative about the principle of this.
- Intention of CP34 is broadly supported but wording of the policy is not effective as currently drafted.
- Current drafting of CP34 is an improvement on earlier drafting.
- Support for identification of five criteria to be satisfied by development outside settlements, particularly viii (relating to strategic employment allocations).
- Intentions of CP34 are supported.
- 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.
- 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.

Delivering SO1: CP35 – Existing employment sites

- Support for CP35 in respect of existing employment sites.
- Continued blanket protection of existing employment sites cannot be justified – should adopt more flexible approach.
- Some concern about flexibility, but policy seems to allow for relocating employment sites where existing areas are not well connected.
- 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.
- 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.
- General support for CP35, but additional paragraph should be added to supporting text to require change of use

	applications to have regard to improving green infrastructure.
Delivering SO1: CP36 – Economic regeneration Delivering SO1: CP37 – Military establishments	 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". Policy does not go far enough: Greenfield sites should not be developed when brownfield sites are available. Should there be reference to SPD/DPDs as well as Neighbourhood Plans? Reference to competition is not clear: regeneration can be within town centres, in which case competition is good. Identification of regeneration sites should not be limited to urban areas. Core Strategy does not sufficiently direct development to brownfield sites and town centres: Lack of proactive policies Doing nothing to promote town centres in line with the NPPF No focus on prioritising town centres over Greenfield sites No policies promoting offices in town centres Weak words such as 'support' instead of 'promote' or 'prioritise' No policy on more high density office space in town centres Explicit expression of the NPPF emphasis on town centre vitality Stronger promotion of Trowbridge town sites Policy promoting new offices and small scale employment in town centre sites More emphasis on revitalising existing trading estates and redeveloping MOD sites. New policy that promotes brownfield sites in town centres as priority places for development. Policy must not constrain sites on edge of settlements particularly so consideration is given to future linkages to existing town centres. CP37 is not justified or consistent with national policy.
	Requirement for all development to 'enhance the overall character of the site' appears unrealistic.
	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.
	MOD sites should have been assessed in the same way all other potential sites were. Insufficient weight given to evetsing hillity increase redundant.
	 Insufficient weight given to sustainability issues: redundant

	MOD sites should only be redeveloped where they most
	MOD sites should only be redeveloped where they meet NPPF criteria.
Delivering SO1:	 CS should define a Trowbridge Town Centre Boundary in
CP38 – Retail	line with NPPF requirements.
and Leisure	 Suitable sites should be allocated to meet full needs of
	retail and leisure uses.
	 Secondary frontages and primary shopping areas should be identified on the Proposals Map, in line with NPPF.
	Requirement for retail impact assessment:
	 Unjustified.
	 Inconsistent with inspector's conclusions on SWCS.
	Rephrase CP38 to make consistent with the SWCS
	threshold of 200 sqm gross.
	Deviates from NPPF guidance. Will page tively impact an delivery of CD48.
	 Will negatively impact on delivery of CP48 (supporting rural life).
	Recently approved supermarket extensions show that
	council will not enforce this policy.
	 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.
	 Retail evidence base (GVA report) should be referenced.
	 Proposed policy is welcomed, but is too late.
	 No explanation as to how objective to regenerate the town
	centre shopping areas will be realised.
	More attention is needed to the approaches to the smaller
	Market Town centres and car parks – new policy wording
Delivering SO1:	 suggested. Support for recognition of the importance of the tourism
CP39 - Tourist	industry to Wiltshire's economy, for the inclusion of a
development	specific policy in relation to tourist development, and for the
	Council's 'target' which seeks to "increase and improve
	facilities for sustainable tourism".
	 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).
	Query whether a sequential assessment is necessary for
	all tourist proposals: would it be better to only require
Delivering SO1:	assessment for major proposals?
CP40 – Hotels,	 Criteria (i) is not justified and against competition policy. Question as to whether restriction of competition is
bed and	Question as to whether restriction of competition is allowed.
breakfasts, guest	 The first sentence of CP40 should be expanded to state
houses and	that proposals will be supported "through the sensitive
conference	extension, upgrading and intensification of existing tourism
facilities	accommodation facilities".
Delivering SO2:	Need to define 'sustainability'.
to address	Support for flexible mechanisms to address climate
climate change	change, in line with definition by Central Government.
	 Core Strategy is unsound because IDP does not mention
	issues with water resources. Sections of the Core Strategy

on climate change should make reference to water shortage, and there should be a commitment to 'sustainable' water abstraction.

- Existing policy has failed to achieve a 'step change'.
- Policy should reflect findings of Sir John Harmen commission once this reports back.
- Concern that council is leaving it to others to develop large renewable decentralised energy technologies.
- Council should take pro-active lead on community energy and low-carbon development solutions.
- Renewable Energy Strategy has failed.
- Should be clear mandate that no development takes place in areas of flood risk.
- 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.
- Should be pro-active measures to reduce carbon emissions by using rail to move freight.
- Deeply concerned that further assessment is needed to determine whether ground conditions in Wiltshire may be vulnerable to climate change.
- Concern that not enough consultation has been done on this important subject.

Delivering SO2: CP41 –

Sustainable construction and low carbon energy

Support for principle of CP41.

- Welcome that impact on viability will be taken into account.
- No mention in policy of use of rainwater recycling or re-use of grey water.
- Questions as to how the policy will be monitored and how conditions will be dealt with.
- Policy is more appropriate as part of a Development Management DPD: should be removed or simplified.
- Policy should be redrafted in accordance with NPPF.
- Policy should be reworded to make it firmer too flexible at present.
- Combined heat and power is not a low cost solution.
- CP41 does not reflect NPPF statement that climate change is a key priority.
- Supporting off-site renewable energy does not address the needs of specific sites
- 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.
- CP41: first section climate change adaptation:
 - Trees have additional benefits for climate change which should be recognised.
 - 'Encourage' is too weak and needs to be strengthened.
 - 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.."
- CP41: second section sustainable construction:

- Inclusion of specific levels of the Code for Sustainable Homes is overly prescriptive and not flexible, and will undermine a 'fabric first' philosophy.
 Remove specific CSH levels and target dates and replace with general wording to seek best levels of sustainability on a site specific basis.
 Energy and sustainability more appropriately controlled by Building Regulations.
- No technical assessment has been undertaken to
- demonstrate that policy is deliverable or viable.
 Question the need to exceed Building Regulations in terms of energy reduction.
- Should amend policy to require sustainable design and construction in accordance with future changes to Building Regulations.
- Core Strategy should not impose mandatory requirements for CSH
- Insufficient regard to the ability of smaller sites to achieve CSH requirements.
- Locally specific carbon targets are inconsistent with the NPPF.
- CP41: third section existing buildings
 - Unclear whether retrofitting at whole street or neighbourhood level will be the responsibility of the developer or the council.
 - Not sure why building integrated renewable or low carbon technologies are below remote low carbon across the board.
- CP41: fourth section renewable and low-carbon energy
 - Policy needs to be flexible rather than imposing zero-carbon standards from 2013 for developments of over 500 homes.
 - Target for developments over 500 units to be zero carbon by 2013 is extremely ambitious and basis for this target is unclear.
 - No evidence as to why zero carbon by 2013 for 500+ units is required or justified in Wiltshire.
 - Zero carbon target should be reconsidered in light of the NPPF.
 - No justification for requirement to submit a Sustainable Energy Strategy.
 - Viability of development should be considered.
 - Policy will impact on viability and delivery of affordable housing.
 - Threshold for major development to meet zerocarbon standards should be much lower at 200-250 units.

Delivering SO2: CP42 – Standalone renewable energy installations

- Support for CP42.
- Support for reference to AONB locations and settings.
- Current policies for renewable energy provision have failed

 e.g. not delivered through ESCo's and fail community
 payback opportunity
- Policy should include minimum distance threshold of 2,000

	to energy crops has not been considered.
	 Need to clarify that some renewable energy technologies
	require additional permissions over and above planning.
	Performance measure should equal 376 MW.
	Progress in Wiltshire to deliver renewable energy needs to
Delivering SO3:	be speeded up.
CP43 – Providing	 The affordable housing target should be 50%, not 40%, on sites of 5 or more dwellings.
affordable homes	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.
	 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%.
	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.
	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.
Delivering SO3:	Restriction to 10 dwellings on exception sites appears
CP44 – Rural	unnecessary.
exceptions sites	 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.
Delivering SO3:	The type and mix of accommodation should be determined
CP45 – Meeting	by the development industry.
Wiltshire's	
housing needs	Core Policy 45 should allow greater flexibility for viability.
	The policy should also consider market demand.
	Housing requirement does not adequately consider the
	supporting evidence. An alternative model should be
	employed which draws upon other variables.
	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.
Delivering SO3:	Estre care homes should not used to see die offendal.
LUCIO AUS	 Extra care homes should not need to provide affordable

CP46 – Meeting the needs of Wiltshire's vulnerable and older people	homes.
Delivering SO3: CP47 – Meeting the needs of Gypsies and	 Target should be expressed as part of the overall housing figure and not identified separately. Temporary permissions should be taken into account
Travellers	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.
	 There is no essential need to locate Travellers in the countryside therefore should be located close to possible places of work and local facilities.
	Policy fails to define who qualifies as a Gypsy or Traveller.
Delivering SO4: helping to build resilient communities	 By allocating only limited development in rural areas, many villages will experience population loss, continued outcommuting, loss of local services and businesses and a lack of affordable housing Need to plan for provision of emergency service facilities and infrastructure, meeting halls and places of worship
Delivering SO4: CP48 – Supporting rural life	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'.
	NPPF demands a comprehensive and suitably flexible regime for the preference for re-use of existing rural buildings and previously developed land.
	Buildings often need significant re-building particularly as part of conversion works to meet building regs.
	The wording of the first section of this policy is inadequate to protect the countryside from inappropriate development.
Delivering SO4: CP49 –	 No mention in Core Policy 49 of protecting community facilities in urban areas, only rural areas.
Protection of services and community facilities	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.
	 Buildings which become vacant as a result of relocation should be treated as any other building for which planning permission is sought.
	Simply having a policy to resist market forces will not

	benefit the remaining facilities and will cause them to
	dilapidate; many pubs face closure unless they can significantly increase their trade.
Delivering SO5: CP50 –	General support
Biodiversity and geodiversity	Needs stronger protection of statutory sites
(additional detail to be added)	Conservation credits
to be added)	Strengthen the requirement for enhancement
	Policy is too detailed
	Contributions should be reasonable and proportionate
	WFD objectives
Delivering SO5: CP51 –	General support
Landscape (additional detail	BMV agricultural land
to be added)	Need to protect against coalescence
	Need to strengthen wording
	Too imprecise
	Too detailed
	Not in conformity with NPPF
	Protection of AONBs:
	 Need to consider settlement strategy in AONBs Need to consider housing numbers in AONBs
Delivering SO5: CP52 – Green infrastructure (additional detail to be added)	General support
	Strengthen wording
	Assessment / enhancement of offsite GI
	Coalescence
	Open space standards
	Definition of GI
	Too detailed
Delivering SO5: CP53 – Canals	General support
(additional detail to be added)	Use of SUDS

	Decembrish of social for containable toward
	Recognition of canals for sustainable transport
	Saved policies for K&A are out of date
	Loss of community facilities
	Need to balance users' needs
	Need to consider impacts of new alignments
Delivering SO5:	General support
CP54 – Cotswold Water Park	
Delivering SO5: CP55 – Air	Support.
Quality and CP56 – Contaminated	
land	
Delivering SO5: CP57 – Ensuring	Policy is considered more appropriate as part of a
high quality	development management development plan document (or
design and place	SPD) as the policy will not help meet the strategic objectives of the core strategy. Therefore policy should be
shaping	removed or simplified.
	Specific detail within the policy should be considered within
	a subsequent SPD/DPD.
	CP57 is too detailed which will make it difficult to apply.
	Subsections of the policy should be simplified and consolidated.
	 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'. • 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'. • 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
Delivering SO5:	 submission of the planning application. CP58 should be extended to include reference to the
CP58 – Ensuring	alteration and extension where appropriate of redundant
the conservation	and under-used historic buildings and areas.
of the historic	Paragraph 4 of CP58 is misleading and therefore
environment	unjustified in that there is no caveat as to whether or not
	exploitation of benefits would be both appropriate and sensitive in nature.
	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
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there is an understanding of what is 'at risk' nor a clear strategy in response to those assets at risk. CP58 requires the inclusion of a reference to registered battlefields. Also the reference to setting at i, iii, iv, v appear to be superfluous. 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. Reference to the protection of the World Heritage Site within CP58 should include reference to the protection of setting. Delivering SO5: CP59 is incomprehensible. The wording of the policy also CP59 – The indicates that the obligation under the World Heritage Stonehenge, Convention is either misunderstood or inconsistently Averbury and expressed. Associated Sites World Heritage CP59 does not clearly express an understanding of Site and its Outstanding Universal Value (OUV). OUV is an abstract setting concept that cannot be managed. The policy emphasis should be upon the protection of the site and its setting rather than OUV. Delivering SO6: Purton waste site is not most efficient or sustainable for CP60 transport and does accord with overall stated policy. Sustainable Transport CP60 & 66 both make reference to a Local Transport Plan large parts of which have still not been delivered. The LTP is not complete and a number of strategies are outstanding. Improving journey time reliability is only achievable in the short term and conflicts with the sustainable transport aims. CP60 should also recognise that in relation to tourism uses, there is often no feasible alternative to the private car. 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'. Policy should include the re-opening of railway stations.

	Proposals for Chippenham are contrary to bullets iii. and vi.
	 Policy is more appropriate as part of a Development Management DPD.
	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.
	 Policy is not precise or meaningful in terms of its objectives, method or monitoring and is too vague to be convincing.
	 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.
Delivering SO6: CP61 – Transport and Development	 Policy TR14 of Salisbury District Plan should be reinstated. Policy wording does not refer to the reuse of buildings. The wording does not comply with the provisions of NPPF.
	 Concern re transport proposals at J16. Policy fails to address the layout of new development. Reword policy to promote good walking and cycling environment.
	 Criterion (ii) should include reference to safe access to the rail network as well as to the highway network. May be more appropriate to provide offsite waiting than on
	site facilities to meet worst case scenarios, particularly for town centre locations. • Unsure of implications of this policy, particularly the operation of the hierarchy.
	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
	 There needs to be provision in the design of road layouts for parking in front of villages facilities.
Delivering SO6: CP62 – Development	The 'national primary route network' and 'built up areas' are not been defined in the Core Strategy: need clarification.
impacts on the transport network	 Developers should be allowed to use contributions more flexibility to improve cycle and pedestrian networks beyond the development site.
	This policy appears to conflict with the proposals for

	Chinnanham
	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.
Delivering SO6: CP63 – Transport strategies	CP63 needs to make reference to the Options Assessment Report and conclusion of 'Radical' transport option as specified in the inspectors report.
	References to the Salisbury Transport Strategy need to be re-instated in the Wiltshire Core Strategy.
	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.
	Indicators provided in the CP63 are inadequate.
	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.
Delivering SO6: CP64 – Demand management	Standards should reflect needs of rural areas with poor public.
management	Business owners should not be compelled to charge for such spaces.
	Concerned about the preference to use unallocated communal car parking: this could result in potential crime and community safety issues.
Delivering SO6: CP65 – Movement of goods	Plan does not properly address cross boundary movement of goods/freight.
	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.
Delivering SO6: CP66 – Strategic transport network	Add Westbury railway station to list of stations to be improved.
	Options evaluated in SA are poor quality.
	Improving journey time reliability is only achievable in the short term and conflicts with the sustainable transport aims.

	•	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.
	•	Description of Transwilts rail line is missing. Should mention joint working with West of England Partnership on transport.
	•	The inclusion of Corsham railway station is welcomed.
	•	Greater emphasis for the need for railway station at RWB especially in relation to developments at Lyneham.
	•	More detail about proposals should be in policy. Unhappy at pressure being exerted by Swindon from development and design.
	•	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.
Delivering SO6: CP67 – Flood risk		Should be a general presumption in favour of locating all new development outside flood zones 2 and 3. CP67 should make this absolutely clear. Risk of flooding should be viewed as part of a range of planning considerations rather than an absolute constraint. CP67 is too detailed and should be included in a Development Management DPD.
Delivering SO6: CP68 – Water resources		CP68 offers little or no support for the protection of water resources in the River Kennet. 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.
	•	The Core Strategy is unsound because it fails to adequately and sustainably address the issue of water supply / security.
	•	CP68 fails to address the requirement that <u>all</u> development

	should present water efficiency measures.
	The trend of over abstraction of many of Wiltshire's rivers cannot be allowed to continue.
	Overall levels of growth:
	 The Plan should reduce the projected housing and employment land quantum in order to ensure that water resources and natural systems are not compromised.
	 The Plan is not supported by evidence to prove that water supplies can be delivered to support growth in a sustainable manner.
Delivering SO6: CP69 – Protection of the	 CP69 should provide the same level of protection to the River Kennet SSSI as that afforded to the River Avon SAC.
River Avon SAC	CP69 is too detailed and should appear in a Development Management DPD.
	 CP69 must be re-drafted to fully comply with the rigour of the Habitats Directive and the requirements of the Appropriate Assessment regime.
7. Monitoring and review	 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. There are inaccuracies in relation to the 'Land East of the Dene'. Recommendation to include additional policy targets including: Contributions secured to maintain and improve heritage assets.
	 The reduction in the number of heritage assets on the national at risk register.
8. Glossary and common acronyms	 Request for definition of 'sustainable development' General request for clarification in a number of places in the glossary.
Appendix A: Development templates for strategic allocations	 General comments: Development templates have not been subject to formal public consultation. Welcome that strategic allocations will be brought forward through a master planning process agreed between the community, LPA and the developer. Clarification needed that if the community identify further requirements not set out in the development templates then these must also be considered. 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.
- o 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.
- Issues affecting more than one site:
 - 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.
 - 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.
- Land at Kingston Farm, Bradford on Avon:
 - Remove requirement for pedestrian/cycling link to the town centre which avoids the B3107
 - Land identified as 'indicative greenspace' is not available for public use.
 - Employment quantum should be expressed as new build floorspace (and should be reduced).
- Chippenham sites:
 - Should remove reference to delivery of a railway bridge in relation to Rawlings Green and the North Chippenham Strategic Site.
- North Chippenham Strategic Site:
 - Amend extent of strategic site to reflect current application.
 - Remove restrictive phasing for employment/housing.
 - Template should recognise need to ensure viability on this site.
- Rawlings Green, East Chippenham Strategic Site:
 - Remove reference to employment development coming forward in advance of further residential development.
 - Amend text in relation to employment provision, including amending to cover all relevant use classes and to include reference to demand and viability.
- South West Chippenham Strategic Site:
 - Ensure that delivery of employment land is not over burdened by contributions.

- Unclear what the Chippenham strategy will require.
- Land at Horton Road, Devizes:
 - 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.
- Land at 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.
- Land at Salisbury Road, Marlborough:
 - Add potential for hotel use.
- Ashton Park Urban Extension, Trowbridge:
 - Strategic site should include land south of West Ashton Road.
 - Should be a requirement for 100m buffer for all ancient woodland.
 - 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.
 - Promoters of the site note that all provisions and contributions will be subject to viability.
 - Important that the pro-forma only relates to land within the development.
- Land at West Warminster
 - Core Strategy is relatively silent on development affecting Cley Hill Scheduled Monument and its setting.
 - 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.
- Land at Mill Lane, Hawkeridge, Westbury:
 - Comments covered in the Westbury area strategy section.
- Land at Station Road, Westbury:
 - Persimmon Homes & 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.
- South Wiltshire Development Templates:
 - 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.
 - o Format of South Wiltshire IDP and development

templates should be the same as the rest of the county. 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. Appendix B: List Not all documents were available during the previous of topic papers consultation (June to August, 2011). Topic Paper 8 should include fire mains where it mentions fire hydrants. The 35% Brownfield target, referenced in Topic Paper 2, is at odds with SO7 and the NPPF. 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. Appendix C: No detailed demonstration of the 5 year land supply. Housing trajectory Lack of evidence to support the proposed housing numbers. Information about discussions with developers hasn't been included. 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. Housing trajectory: 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. Housing trajectories are too optimistic, especially in the first 5 years of the plan. Questionable whether trajectory has taken into account latest LDS or recent economic downturn. Appendix D: Policy T1a Westbury Bypass Package. Large public Saved policies response looking to remove the bypass policy as has been and policies rejected in a public enquiry. replaced Policies HC2, ED21 & ED22 (Kennet District Local Plan) should be removed as planning for sites has overtaken policy for a variety of reasons. Policies R7, H8 & H9 West Wilts Local Plan should be

	saved for variety of reasons. Policy E1a needs to be checked as sites appear as different sizes.
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Appendix E: List of settlement	 Proposed removal of settlement boundaries has not been communicated to the electorate in an active manner. There
boundaries	has not been an open debate on this matter.
retained and	has not been an open debate on this matter.
Appendix F: List of settlement	Durrington and Bulford need to be listed in appendix E.
boundaries	Changes proposed to Ramsbury boundary with reference
removed	to site at land rear of Penllyne.
Appendix G:	The Principal Employment Area at Southampton Road,
Principal Employment	Salisbury should reflect the existing employment provision
Areas	and be extended accordingly.
Appendix H:	The proposed Wilts and Berks canal route wasn't on the
Proposals map	Proposals Map.
	The proposals map wasn't made available to comment on
	as part of this consultation therefore not allowing
	comments to be made.
Infrastructure	Strategic infrastructure:
Delivery Plan	 Add need for improvements to J17 of the M4
	Provisions for Corsham Cycle Network and green Provisions for Corsham and Corsham are
	corridor between Chippenham and Corsham are not likely to be delivered by the Core Strategy.
	, or
	Strategic sites:
	 Clarify which of the Chippenham sites need to
	contribute to the railway crossing.
	Rawlings Green, Chippenham site is likely to be
	expected to deliver infrastructure not identified in
	the IDP.
	 IDP does not mention the need for a country park at
	Rawlings Green, Chippenham.
	 Amend costs of site access to Land at Mill Lane,
	Westbury.
	 IDP contains reference to infrastructure to be
	delivered with Land South of Netherhampton Road
	strategic allocation, which has been removed.
	Level of information on infrastructure projects:
	 Infrastructure schemes need to be fully justified,
	,,,,

- costed and include information on how and when they will be delivered.
- Change format of the south Wiltshire sections of the IDP to match those of the rest of the county.
- IDP should provide relevant information on water resources
- o IDP should place more importance on town centres.
- Preparation of the IDP:
 - Infrastructure requirements need to be agreed between the council, infrastructure providers and developers.
 - o When will the IDP be reviewed?
- Publication of the Infrastructure Delivery Plan
 - The IDP was not included as evidence for earlier stages of the consultation.