# AGENDA

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| **Meeting**: | Cabinet |
| **Place**: | Council Chamber - Council Offices, Browfort, Bath Road, Devizes SN10 2AT |
| **Date**: | Tuesday 19 June 2012 |
| **Time**: | 10.30 am |

**Membership:**

| | |
|---|---|
| Cllr John Brady | Cabinet Member for Finance Performance and Risk |
| Cllr Lionel Grundy OBE | Cabinet Member for Children's Services |
| Cllr Keith Humphries | Cabinet Member for Public Health and Protection Services |
| Cllr John Noeken | Cabinet Member for Resources |
| Cllr Fleur de Rhe-Philipe | Cabinet Member for Economic Development and Strategic Planning |
| Cllr Jane Scott OBE | Leader of the Council |
| Cllr Toby Sturgis | Cabinet Member for Waste, Property, Environment and Development Control Services |
| Cllr John Thomson | Deputy Leader and Cabinet Member for Adult Care, Communities and Housing |
| Cllr Dick Tonge | Cabinet Member for Highways and Transport |
| Cllr Stuart Wheeler | Cabinet Member for Transformation, Culture, Leisure and Libraries |

Please direct any enquiries on this Agenda to Yamina Rhouati, of Democratic Services, County Hall, Trowbridge, direct line 01225 718024 or email Yamina.Rhouati@wiltshire.gov.uk

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

All public reports referred to on this agenda are available on the Council's website at www.wiltshire.gov.uk

# Part I

## Items to be considered while the meeting is open to the public

<u>Key Decisions</u>    Matters defined as 'Key' Decisions as included in the Cabinet's Forward Work Plan are shown as ⚿

**1    Apologies**

**2    Minutes of the previous meeting** *(Pages 1 - 8)*

To confirm and sign the minutes of the last Cabinet meeting held on 17 April 2012 (copy attached).

**3    Minutes - Capital Assets Committee** *(Pages 9 - 14)*

To receive and note the minutes of the Capital Assets Committee held on 24 May 2012.

**4    Declarations of Interest**

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

**5    Leader's announcements**

**6    Public participation**

The Council welcomes contributions from members of the public. This meeting is open to the public, who may ask a question or make a statement. Written notice of questions or statements should be given to Yamina Rhouati of Democratic Services by 12.00 noon on Thursday, 14 June 2012.  Anyone wishing to ask a question or make a statement should contact the officer named above.

**7    Submission of Wiltshire Core Strategy and Review of the Local Development Scheme** *(Pages 15 - 92)*

⚿ Report by the Service Director for Economy and Regeneration.

The views of the Environment Select Committee which considered the Strategy at its meeting on 11 June 2012 will be circulated to Cabinet members prior to the meeting and included with the agenda papers on the Council's website. The latest version of the Draft Wiltshire Core Strategy has also been included on the website.

**8    Wiltshire and Swindon Aggregate Minerals Site Allocations Development Plan Document - Submission to Secretary of State** *(Pages 93 - 124)*

⚿ Report by the Service Director for Economic Regeneration.

**9     Children in Care Commissioning Strategy** *(Pages 125 - 180)*

Report by Carolyn Godfrey, Corporate Director.

**10     Falls and Bone Health Strategy** *(Pages 181 - 214)*

Report by Maggie Rae, Corporate Director for Public Health and Public Protection.

**11     Business Plan Annual Update** *(Pages 215 - 238)*

Report by the Head of Policy, Performance and Corporate Business Management.

**12     Revenue Outturn 2011/12** *(Pages 239 - 260)*

Report by the Service Director for Finance to follow.

**13     Urgent Items**

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


# Part II

## Items during consideration of which it is recommended that the public be excluded because of the likelihood that exempt information would be disclosed


None


The items on this agenda reflect the key goals of Wiltshire Council, namely 'Work together to support Wiltshire's Communities', 'Deliver high quality, low cost, customer focused services and 'Ensure local, open, honest decision making'

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# Wiltshire Council

*Where everybody matters*

## CABINET

MINUTES of a MEETING held in COUNCIL CHAMBER - COUNCIL OFFICES, BROWFORT, BATH ROAD, DEVIZES SN10 2AT on Tuesday, 17 April 2012.

| | |
|---|---|
| Cllr John Brady | Cabinet Member for Finance Performance and Risk |
| Cllr Lionel Grundy OBE | Cabinet Member for Children's Services |
| Cllr Keith Humphries | Cabinet Member for Public Health and Protection Services |
| Cllr John Noeken | Cabinet Member for Resources |
| Cllr Fleur de Rhe-Philipe | Cabinet Member for Economic Development and Strategic Planning |
| Cllr Jane Scott OBE | Leader of the Council |
| Cllr John Thomson | Deputy Leader and Cabinet Member for Adult Care, Communities and Housing |
| Cllr Dick Tonge | Cabinet Member for Highways and Transport |
| Cllr Stuart Wheeler | Cabinet Member for Transformation, Culture, Leisure and Libraries |

| | |
|---|---|
| Also in Attendance: | Cllr Trevor Carbin |
| | Cllr Richard Gamble |
| | Cllr Mike Hewitt |
| | Cllr Jon Hubbard |
| | Cllr Jerry Kunkler |
| | Cllr Alan MacRae |
| | Cllr Mark Packard |
| | Cllr Jonathon Seed |

## 51.   Apologies

Apologies were received from Councillor Toby Sturgis.

## 52.   Minutes of the previous meeting

The minutes of the meeting held on 20 March were presented.

**Resolved:**

**To approve as a correct record and sign the minutes of the meeting held on 20 March, subject to the addition of Councillor Mike Hewitt to the list of those also in attendance.**

## 53.   Minutes - Capital Assets Committee

The minutes of the meeting of Cabinet (Capital Assets) Committee held on 21 March were received and noted.

54. **Declarations of Interest**

There were no declarations of interest.

55. **Leader's announcements**

None.

56. **Public participation**

The Leader commented that members of the public were welcome to participate in the discussion on items on the agenda.

57. **Olympic Resilience**

Cllr Keith Humphries, Cabinet Member for Public Health and Protection Services, introduced a report providing an overview of on-going work in respect of resilience planning for the Olympic and Paralympic activities in Wiltshire during summer 2012, and demonstrating that there was robust planning in place to ensure that our residents and communities were safeguarded from risks.

Laurie Bell, Service Director for Policy and Communications, circulated the first draft of a calendar of events taking place around the county to celebrate the Jubilee and the Olympics. Work was ongoing with local and national media to coordinate coverage of various events.

**Resolved:**

**The Cabinet noted the report.**

Reason for Decision

To provide understanding an assurance with respect to the resilience planning and preparedness for the 2012 Olympics and Paralympics.

58. **Healthcare Services at HMP Erlestoke**

Cllr Keith Humphries, Cabinet Member for Public Health and Protection Services, introduced a report which provided an update on healthcare services at HMP Erlestoke, outline improvements in the performance of health services at HMP Erlestoke and outline strategic changes affecting the commissioning of those services. The report also sought Cabinet's approval to plans to undertake a tendering process for psychosocial substance misuse services in the prison.

The Leader introduced Mary-Ann McKibben, Public Health Consultant, who spoke about the on-going Health Trainer Programme, which had been trialled in prisons, and sought to train peers within a community to provide support on a number of health issues, including weight loss and smoking. Councillors considered that this project fitted in well with the overall programme of activities at the prison, and the project was support and endorsed by all.

Councillors were invited to visit the prison and see the various services being provided.

**Resolved:**

**That Cabinet:**

1. **Receives the update on healthcare services at HMP Erlestoke, improvements in the performance of health services at HMP Erlestoke and strategic changes affecting the commissioning of these services;**
2. **Agrees the plans to undertake a tendering process for psychosocial substance misuse services in the prison; and**
3. **Delegates authority to execute the contracts resulting from the tendering activity to Maggie Rae, Corporate Director of Public Health and Public Protection, in consultation with the Portfolio Holder, Solicitor to the Council and the Chief Financial Officer.**

Reason for Decision

Wiltshire Council is a key partner in the Wiltshire Community Safety Partnership which holds responsibility for addressing alcohol and drugs issues. From April 2013, the Public Health team will bring responsibility for commissioning psychosocial and other substance misuse services at the prison with it on transfer to the Council.

59. **Addressing Alcohol and Drugs in the Community**

Cllr Keith Humphries, Cabinet Member for Public Health and Protection Services, introduced a report which provided an update on actions to reduce alcohol and drug-related harms in Wiltshire and to outline improvements in the performance of specialist substance misuse services. The report also outlined the strategic changes affecting the commissioning of these services, including plans to tender an integrated community substance misuse treatment and care service for adults.

Cllr Humphries referred to the on-going work and success stories listed at page 37-39 of the report, commenting that this was bringing in extra funding of £115,000. Reference was also made to work in schools and with youth workers to educate young people on the risks of alcohol and drugs. Concern was raised

that some of the problems were hidden, particularly in rural communities, and more work was needed to identify and address these health risks.

Councillors also referred to the problems caused by the availability of cheap alcohol, in particular spirits.

It was noted that the report had been considered by the Health and Adult Social Care Select Committee; Councillors were pleased to note that the report had taken on board the Select Committee's comments that the procurement process should consider separate tenders for individual services, alongside tenders for combined services.

The Leader asked that confirmation be sought as to whether any services and funding from this service area would transfer to the new Police Commissioner after November 2012.

**Resolved:**

**That Cabinet:**

1. **Receives this update on the importance and progress in addressing alcohol and drug problems in Wiltshire;**
2. **Agrees in principle to the proposal to undertake a tendering process to provide an integrated adult drug and alcohol treatment and care service;**
3. **Delegates authority of consideration of a procurement options paper to the Corporate Director in consultation with the Cabinet Member; and**
4. **Delegates authority to execute the contracts resulting from this tendering activity to Maggie Rae, Corporate Director of Public Health and Public Protection, in consultation with the Portfolio Holder, Solicitor to the Council and the Chief Financial Officer.**

Reasons for Decision

Wiltshire Council is a key partner in the Wiltshire Community Safety Partnership which holds responsibility for addressing alcohol and drugs issues. From April 2013, the Public Health team will bring responsibility for commissioning alcohol and drug treatment with it on transfer to the Council.


60. **Full Utilisation of Care & Support Framework Agreement**

Cllr John Thomson, Cabinet Member for Adult Care, Communities and Housing, introduced a report which sought Cabinet agreement to a proposal to outsource the Council's in-house provider "Wiltshire Supported Living Service" (WSLS) for adults with learning disabilities, to other Support Providers who were already delivering the majority of specialist care and support across the county, under a

framework agreement initially agreed by Cabinet in 2009. The decision would mean a transfer of potentially 52 full time equivalent staff to the new provider/s and this would take place under the Transfer of Undertakings (Protection of Employment) Regulations 2006.

It was noted that the proposals would result in a saving of £195,000, which was reflected in the Council's latest financial plan for 2012/13.

**Resolved:**

**That Cabinet agrees:**

1. **To enter into a competitive exercise with the 9 Care and Support Providers who have been listed on the Council's existing Framework Agreement since 2009; to procure the support services which will mean that the Council's own staff will "TUPE" transfer across to the successful appointed provider/s; and**
2. **To delegate authority to the Corporate Director with responsibility for Adult Services to award the contract in consultation with the appropriate service directors.**

Reason for Decision

The majority of supported living services are already provided by independent sector care and support providers across the county. These organisations provide a quality care and support service to individuals living in their own homes.

This decision represents the last phase of the transfer of the Council's own services to providers under this framework. In brief this means that 25 customers already living in their own homes (some with shared tenancies), will continue to receive the same high quality person-centred care and support, but where the staff providing that support will be managed and employed by an independent provider instead of the Council.

61. **Illegal Money Lending Team - Authorisation**

Cllr Keith Humphries, Cabinet Member for Public Health and Protection Services, introduced a report which sought approval for Wiltshire Council to authorise the Illegal Money Lending Section of Birmingham City Council to investigate and institute proceedings against illegal money lenders operating within the Wiltshire Council area as part of a national collaborative project.

Councillors supported the principle of addressing illegal money lending in Wiltshire, and it was hoped that people could be directed towards the Credit Unions. Reference was also made to the need to publicise the action to discourage illegal money lenders from operating in the county.

It was noted that the primary reasons people gave for using unlicensed money lenders was for utility bills and food. Other support mechanisms existed for this and it was suggested that a briefing note could be produced for Councillors. In addition, it was hoped that a publicity campaign could be developed in partnership with the Citizens Advice Bureau. The Leader undertook to speak to Sarah Cardy at the CAB about this.

**Resolved:**

**That the Cabinet agrees that the discharge of its function of the enforcement of Part III of the Consumer Credit Act 1974 be carried out in Wiltshire by Birmingham City Council (pursuant to Section 101 of the Local Government Act 1972, Regulation 7 of the Local Authority (Arrangements for Discharge of Functions) (England) Regulations 2000 and Section 13 and 19 of the Local Government Act 2000).**

**That the "Protocol for Illegal Money Lending Team Investigations" (attached as Appendix 2 to the report) be agreed and authority be delegated to the Service Director, Public Protection to enter into the agreement on behalf of Council and approve minor alterations if required.**

Reason for Decision

The proposal will add to the Council's resources and will enable Wiltshire's Trading Standards Service to have access to a team of highly trained experts from the Illegal Money Lending Team.

62. **Budget Monitoring**

Cllr John Brady, Cabinet Member for Finance Performance and Risk, introduced a report which advised Members of the revenue budget monitoring position as at the end of Period 11 (February 2012) for the financial year 2011/12 and highlighted significant cost pressure and changes since the last report on 15 February 2012.

Cllr Brady referred to the need to reduce the use of cash, in view of the high cost of processing cash (around 20p per £100). The majority of cash came in from Leisure and Car Parking services, and alternatives were being considered, including direct debit and paying for parking by phone. Cllr Jon Hubbard made reference to the use of Paypoint, and a misleading message on Paypoint machines saying they could be used to pay Council Tax; this was not currently the case in Wiltshire.

It was clarified that the overspend on Communications and Branding related to a drop in projected income from sponsorship, some of which had been offset by savings elsewhere in the service. Some sponsorship deals were in the pipeline

but would come into the 2012/13 budget, where the budgeted figure had been amended to reflect the current economic climate.

Referring to Bad Debt Provision, Cllr Brady also noted the Council's excellent record in Council Tax collection rates.

**Resolved:**

**Cabinet noted the outcome of the Period 11 (February) budget monitoring and the update movements since the previous report in February.**

Reason for Decision

To inform effective decision making and to ensure a sound financial control environment.


63.    **Urgent Items**

There were no urgent items.


(Duration of meeting:  10.30 am - 12.03 pm)


These decisions were published on the 19 April 2012 and will come into force on 27 April

The Officer who has produced these minutes is James Hazlewood, of Democratic Services, direct line 01722 434250 or e-mail james.hazlewood@wiltshire.gov.uk
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# Wiltshire Council
### Where everybody matters

# CABINET CAPITAL ASSETS COMMITTEE

MINUTES of a MEETING held in COUNCIL CHAMBER - COUNCIL OFFICES, BRADLEY ROAD, TROWBRIDGE, BA14 0RD on Thursday, 24 May 2012.

| | |
|---|---|
| Cllr Jane Scott OBE | Leader of the Council |
| Cllr John Noeken | Cabinet Member for Resources |
| Cllr Fleur de Rhe-Philipe | Cabinet Member for Economic Development and Strategic Planning |
| Cllr Toby Sturgis | Cabinet Member for Waste, Property, Environment and Development Control Services |
| Cllr John Thomson | Deputy Leader and Cabinet Member for Adult Care, Communities and Housing |

Also in Attendance:    Cllr John Brady
                       Cllr Dick Tonge
                       Cllr Stuart Wheeler
                       Cllr Peter Doyle
                       Cllr Jemima Milton
                       Cllr Bill Moss

## 19    Apologies

An apology for absence had been received from Cllr Lionel Grundy.

## 20    Minutes of the previous meeting

### Resolved:

**To approve as a correct record and sign the minutes of the meeting held on 21 March 2012.**

## 21    Chairman's Announcements

None.

## 22    Declarations of interest

There were no declarations of interest.

23    **Extra Care Development - Burnham House Site, Malmesbury**

Councillor John Thomson, Cabinet Member for Adult Care, Communities and Housing introduced the report updating members on the progress of the extra care development initiative for older people on the former Burnham House site in Malmesbury.

The contract for the development of the site was currently subject to a mini-competition procurement exercise under the joint preferred developer framework established with Devon County Council.  Subject to the satisfactory completion of this exercise, the report sought delegated authority for the relevant Cabinet Members to award the contracts in liaison with the Corporate Director and the Section 151 officer.

Councillor Thomson reported that the project was an excellent example of community engagement, with three members of the community being part of the tender evaluation panel.

**<u>Resolved</u>**

**That the Cabinet (Capital Assets) Committee:**

a.  **Notes the progression of the extra care development initiative for older people on the former Burnham House site in Malmesbury.**

b.  **Delegates authority to the Cabinet Member for Adult Care, Communities and Housing and the Cabinet Member for Waste, Property, Environment and Development Control Services in liaison with the Corporate Director (Statutory Responsibility for Adult Care Services) and the Section 151 Officer to award the extra care development, management and care and support provision contract, where appropriate, on the former Burnham House site in Malmesbury following the satisfactory conclusion of the formal tendering process.**

<u>Reason for Decision</u>

The joint preferred development framework contract with Devon County Council provides an innovative and efficient procurement mechanism to select construction partners, operators and potentially care and support providers for extra care facilities across Wiltshire and Devon.

The development of extra care housing on the Burnham House site would meet the needs of the growing elderly population in Malmesbury and improve choice and control for older people whilst providing a vital community resource.

The involvement of the Burnham House Working Group in the tender evaluation and development of the scheme, promotes community engagement and will ensure that the facilities meet the needs of the local community.


24    **Rudloe Community Centre**

Councillor John Thomson, Cabinet Member for Adult Care, Communities and Housing, introduced the report which sought initial approval to work with GreenSquare to explore options to re-develop the Rudloe Community Centre in conjunction with GreenSquare's assets and some Wiltshire Council land in the immediate area.

Councillor Thomson moved an additional recommendation 5, which sought to clarify the arrangements for reporting back to the Capital Assets Committee

**Resolved**

1. **To seek approval to work with GreenSquare and the local community to explore options to remodel and to deliver a successful, well used and well resourced community centre**

2. **To explore options to use council owned land together with GreenSquare assets to generate funding to enable remodelling of the community centre**

3. **To explore options to transfer the ownership of the community centre**

4. **To explore opportunities to create wider links in the community e.g. with military personnel and their families.**

5. **That a further report will be brought to the Cabinet Capital Assets Committee outlining the outcomes of the further feasibility work and a financial appraisal to show how this will be funded, and to seek approval to any proposals to transfer ownership of and/or remodel the community centre.**


Reasons for Decision

The existing layout of the community centre was not fit for purpose and it was not being used as a hub for community activities. New designs could create a layout which would maximise the space within the centre and provide facilities that would benefit different community activities. There was an established community in Rudloe with many local people wanting to see the community centre used to its full potential.

Rudloe was an area where the community would benefit from a well run, fully functioning community centre. Data from the 2001 census showed that Rudloe had a high percentage of vacant dwellings, which may be a result of the high turnover of military personnel within the area and a low percentage of ownership. The military accounted for almost 14% of the housing stock and was likely to be associated with a high turnover of population. The second was that of the total housing stock, Rudloe had a high proportion of social housing.

In 2011 the founding and long standing trustees of RCA stood down and a new group had since been formed. This group was keen to work with the council to find a solution to the current issues.

The proposal could help link Rudloe with the wider community to help create a sustainable community and provide a fully functioning community centre.

25    **Wiltshire Council Land - Easton Square, Sherston**

Councillor John Thomson, Cabinet Member for Adult Care, Communities and Housing, introduced a report which sought approval to use a small parcel of Wiltshire Council land to provide some much needed new housing in Sherston in partnership with GreenSquare.

It was noted that GreenSquare had undertaken to provide accommodation for the owners of the existing properties during construction, and that planning permission as still required for the scheme.

**<u>Resolved</u>**

**That Cabinet (Capital Assets) Committee:**

1. **Delegates authority to the Service Director for Strategy and Commissioning in consultation with the Cabinet Member for Housing to approve and execute the transfer of Council land valued at £7,500 to GreenSquare for £1, subject to the planning permission and full agreement of the owners of numbers 11 and 12, Easton Square.**

2. **Authorises officers to work up the scheme with GreenSquare to enable the delivery of a mixed tenure scheme subject to planning permission.**

<u>Reason for Decision</u>

The Council's land has been independently valued at £7,500 and is undevelopable without neighbouring owner occupiers contributing some of their surrounding land to deliver some new housing. The owner occupiers of number

11 and number 12 Easton Square approached the Council to work together to achieve this.

In December 2011 a rural housing need survey was undertaken with the support of the Parish Council and identified 21 households seeking an affordable home in Sherston. The Parish Council are keen to see some more affordable housing for local people. The proposal also makes good use of undevelopable land.

26    **Housing Private Finance Initiative (PFI) Phase 2 Sites**

Councillor John Thomson, Cabinet Member for Adult Care, Communities and Housing, introduced a report which sought approval in principle to allocate sufficient Council owned sites, for nil consideration, to enable the delivery of at least 108 new affordable homes through the Housing Private Finance Initiative (PFI) project phase 2, with a minimum of 48 units delivered on Council owned land.

**Resolved**

**The Cabinet (Capital Assets) Committee agrees to:**

1.  **Approved the allocation in principle of sufficient Council owned sites to enable the delivery of 108 new affordable homes through the Housing Private Finance Initiative (PFI) project phase 2, with a minimum of 48 units delivered on Council owned land as agreed in the Final Business Case, subject to planning permission.**

2.  **Agree that all Council owned site in the project will be provided for nil consideration.**

Reasons for Decision

Delivery of phase 2 of the Housing PFI project will result in the completion of around 108 new affordable homes to meet the housing needs of residents of Wiltshire and will secure up to £23.76 million Revenue Support Grant.

27    **Urgent items**

None.

28    **Exclusion of the Press and Public**

**Resolved**

**That in accordance with Section 100A(4) of the Local Government Act 1972 to exclude the public from the meeting for the business specified in Item 11 because it was likely that if members of the public were present there would be disclosure to them of exempt information as defined in paragraph 3 of Part I of Schedule 12A to the Act and the public interest in withholding the information outweighed the public interest in disclosing the information to the public.**

29 **Housing Private Finance Initiative (PFI) Phase 2 Sites**

The Committee noted the exempt information in relation to the decision at minute 26 above.

(Duration of meeting:  10.30  - 11.05 am)

These decisions were published on the 28 May 2012 and will come into force on 7 June 2012

The Officer who has produced these minutes is James Hazlewood, of Democratic Services, direct line 01722 434250 or e-mail james.hazlewood@wiltshire.gov.uk
Press enquiries to Communications, direct line (01225) 713114/713115

**Wiltshire Council**

**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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**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 1), 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 and

**(iv)**    approves the revision to the Local Development Scheme (as set out in Appendix 3).

**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**

**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 general 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 **link to Cabinet agenda**

Hard copies have been provided to Cabinet Members and available to other Councillors on request. The draft Core Strategy 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[1] 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. 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, although some minor changes are proposed to further improve consistency. These are discussed below (see paragraphs 12 and 17).

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[1] Development Plan Documents (DPD), including the Wiltshire Core Strategy, collectively form the 'Local Plan' for an area.

CM09395/F

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[2].  The full report provides more detail on comments received and Chapter 3 provides an overview of how the consultation was undertaken. This has been made available for viewing in the **Members' Room** and accompanies the agenda papers on the website **link to Cabinet agenda**

      This report will be finalised and 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 1** to this report.

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 2** to this report, together with a brief explanation as to why changes to the draft Core Strategy are not considered justified.

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[2] 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)
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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.  Revisions to the LDS are set out and discussed further in **Appendix 3**. 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 (paragraph 153, NPPF); 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 2011) 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 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, NPPF).

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 from a reserve built up for this purpose. 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. At this stage of the process certain documentation must be submitted to the Secretary of State in accordance with Regulations including the sustainability appraisal report, policies map (formerly known as Proposals Map), consultation report, copies

of representations received at the last formal stage of consultation and other evidence base documents supporting the development of the Core Strategy (e.g. topic papers, habitats regulations assessment).

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.

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**The following unpublished documents have been relied on in the preparation of this Report:**

None

**Appendices:**


Appendix 1 - Schedule of Proposed Changes to the Wiltshire Core Strategy Pre-Submission Document

Appendix 2 - Review of Key Outstanding Issues Raised through Consultation

Appendix 3 - Review of Wiltshire Local Development Scheme 2011

**SCHEDULE OF PROPOSED CHANGES TO WILTSHIRE CORE STRTEGY PRE-SUBMISSION DOCUMENT DEVELOPMENT PLAN DOCUMENT (DPD)**

1.    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.

2.    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.

| Ref' | DPD Ref' | Change | Reason |
|---|---|---|---|
| **Chapter 1- Introduction** | | | |
| 1. | Page 3, Insert new paragraph after 1.1 | *Add paragraph to read:*<br><br>*'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.'* | 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. |
| 2. | Page 3, Para 1.3, Bullet 5 | *Amend sentence to read:*<br><br>'...enhancement of the natural, historic and built environments, ~~wherever possible~~, including maintaining, enhancing...' | No other bullet qualified in this way. Brings continuity to approach. |
| 3. | Page 4, Para 1.7 | *Add to end of paragraph:*<br><br>'...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>...' | Recognises the importance, and significance, of village design statements. |
| 4. | Page 5, Para 1.10 | *Add new bullet to list of strategies and plans:*<br><br><u>'Adopted and emerging plans of neighbouring authorities.'</u> | Highlights that the plan has regard to the plans and strategies of neighbouring authorities. |
| 5. | Page 6, After Para 1.14 | *Add new paragraph to read:*<br><br>**<u>'A strategy that is based on collaborative working relationships</u>**<br><br><u>The Localism Act 2011 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 |
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| | | 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[1].  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 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 2.1). Arising from these discussions two forms of relationship have been identified:<br><br>• Strategic cross boundary relationships including those relating to homes, jobs and infrastructure;<br>• Locally significant relationships relating to specific areas and land uses for example Cotswold Water Park and North Wessex Downs AONB.<br><br>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 on land 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 land to the west of Swindon within Wiltshire due to alternative proposals. Should the proposed strategy and level of growth for Swindon change Wiltshire Council and Swindon Borough Council, as co-operating authorities, will continue to discuss the most appropriate strategy for Swindon's future growth. If land to the west of Swindon area becomes a potential option for growth again appropriate consultation will be undertaken and if necessary the two authorities can pursue a single issue joint Site Allocations DPD for this area.' | |
| | **Chapter 2 – Spatial Portrait** | | |
| 6. | Page 13, After Para | *Add following text to read:* | Drafting error. First |

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[1] 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 |
|------|----------|--------|--------|
| | 2.14 | '**4. Planning for resilient communities**<br><br>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.' | part of Challenge 4 omitted from pre-submission document. |
| | **Chapter 3 – Spatial Vision** | | |
| 7. | Page 15, Spatial Vision | *Revise second paragraph of 'spatial vision' to read:*<br><br>'Wiltshire's important natural ~~and~~, built and historic environment will have been safeguarded and...' | Change requested by English Heritage for clarity. |
| 8. | Page 16, Para 3.4, Bullet 1 | *Add footnote to 27,500 new jobs to read:*<br><br>'Page 7, Para 2.1, Future Employment Needs in Wiltshire- Employment Floorspace and Land Forecasts - April 2011.' | Adds clarity and signpost to how the figure of 27,500 new jobs is arrived at. |
| 9. | Page 16, Para 3.4, Add after final bullet point | *Add new key outcome after final bullet point to read:*<br><br>'Provision of 16 + education including higher education will have been enhanced especially to provide trained employees necessary to deliver economic growth from target sectors'. | This area had been omitted from the pre-submission draft. It is however fully supported by the evidence as summarised in the Economy Topic Paper. |
| 10. | Page 18, Para 3.8, First sentence | *Amend sentence to read:*<br><br>'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 investment in a manner which ~~as far as possible also~~ at the same time protects and enhances them.' | Minor amendments will bring clarity to the paragraph and strike a more appropriate balance. |
| 11. | Page 19, Para 3.10, Bullet 2, | *Amend bullet to read:*<br><br>'Appropriate place shaping infrastructure, | Recognisees other important place making |

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| | | 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.' | infrastructure. |
| **Chapter 4 – The Spatial Strategy** | | | |
| 12. | Page 27, Para 4.22 | *Add footnote to '178 ha' to read:*<br><br><u>'This is made up of 132 ha as identified on page 87 of Topic Paper 7: Economy plus employment land identified in the South Wiltshire Core Strategy.'</u> | Adds clarity and signpost to how the figure of 178ha of employment land is arrived at. |
| 13. | Page 27, Para 4.24, Bullet 6 | *Amend bullet to read:*<br><br>'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. |
| 14. | Page 27, Para 4.26 | *Insert new words to second sentence for consistency with Core Policy 2:*<br><br>'While 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. |
| 15. | Page 28, Paragraph 4.27 | *Amend paragraph to read:*<br><br>'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. |
| 16. | Page 28, Para 4.28 | *Replace paragraph to read:*<br><br><u>'These housing market areas (HMAs) 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 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</u> | Adds clarification to approach with regards to disaggregation and housing requirement. |

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|  |  | 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".' |  |
| 17. | Page 29, Para 4.29 | *Amend paragraph to read:*<br><br>'...infill is defined as the filling of a small gap with the village that is only large enough for <u>not more than a few dwellings, generally only</u> one dwelling. Exceptions to this approach will only be considered through the neighbourhood plan process.' | For clarification and flexibility (previously approved by Wiltshire Cabinet). |
| 18. | Page 30/31/32, Core Policy 2 | *Amend first paragraph to read:*<br><br>'Development outside of the limits of development<u>, as defined on the Proposals Map,</u> will only be permitted where it has been identified through community-led planning...' | Adds clarity. |
|  |  | *Amend second sentence of fifth paragraph to read:*<br><br>'Proposals for development <u>at the small villages</u> will be supported where they seek to meet ~~local~~ housing needs <u>of settlements</u> and/or employment...' | Adds clarity and consistency with Core Policy 1. |
|  |  | *Amend sentence beneath 'Strategic development' to read:*<br><br>'Development will be supported at the following sites in accordance with the area strategies and that meet the requirements <u>of the development plan including those</u> set out in the development templates at appendix A.' | Adds clarity. |
|  |  | *Last paragraph under 'Within the defined limits of development' should be moved to the end of the section on 'Outside of the defined limits of development'.* |  |
|  |  | *Amend list of strategic development sites to include:*<br><br><u>'Local Plan allocations' and 'Vision Sites'</u> | Will give clarity to the sites which have been identified as sources of supply. |
|  |  | *Change reference to* 'East Chippenham' *to:*<br><br>'<u>Rawlings Green</u>, East Chippenham' | Adds clarity. |
|  |  | *Amend the strategic development site from:*<br><br>'South East Trowbridge' *to* '<u>Ashton Park,</u> |  |

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| | | South East Trowbridge'. | |
| 19. | Page 35, Core Policy 3, Para 3 | *Amend paragraph to read:*<br><br>'~~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 viability assessment adequately demonstrates...' | In response to representations.<br><br>Not appropriate to request independent viability assessment for all development proposals. |
| | **Chapter 5 - Area Strategies (General comments)** | | |
| 20. | Pages 36-157, Community Area Strategy Core Policies 4 to 33, Delivery responsibility | *Add wording to 'Delivery responsibility' in each Core Policy to read:*<br><br>'...and town and parish councils through community-led planning processes such as neighbourhood planning.' | In response to representations received to recognise the role of neighbourhood planning in delivering the requirements set within the community area strategies. |
| 21. | Pages 36-157, Community Area Strategies which include AONB | *Amend 'The Strategy for the xxx Area' text to include the following:*<br><br>'The strategy will respond to the Community Area's location (in full or part) within a nationally designated landscape. It will deliver, within the overall objective of conserving the designated landscape, a modest and sustainable level of development.' | In response to representations.<br><br>Strengthens the objective to conserve the AONB. |
| | **Amesbury Area Strategy** | | |
| 22. | Page 39, Para 5.15 | *Amend second sentence of paragraph to read:*<br><br>'The town is surrounded by an ancient landscape: it is close to the ~~Neolithic site of~~ World Heritage Site of Stonehenge ~~- a World Heritage Site (WHS)~~, which attracts over a million visitors a year.' | Clarity. |
| 23. | Page 39, Para 5.19 | *Amend final sentence of bullet 5 to read:*<br><br>'Wiltshire Council will work collaboratively with agencies, such as the Highways Agency ~~and~~, the Department of Transport and English Heritage to try and achieve an acceptable solution to the dualling of the A303 that does not adversely affect the Stonehenge World Heritage Site and its setting.'<br><br>*Reword bullet point 11 as:*<br><br>'An acceptable solution to the need for | Minor amendments will bring clarity to the para.<br><br><br><br><br><br><br>Minor amendments will bring clarity to the para. |

| Ref' | DPD Ref' | Change | Reason |
|---|---|---|---|
| | | dualling the A303 is needed which must incorporate environmental measures to ~~mitigate~~ avoid adverse impacts on the Stonehenge World Heritage Site ~~and other outstanding landscapes~~. In 2007 the Government identified a bored tunnel as the only acceptable solution to this.' | |
| | | *Reword bullet point 14 add as:* | Minor amendments will bring clarity to the para. |
| | | 'Development around Amesbury should be carefully designed so as not to adversely affect the Stonehenge World Heritage Site or its setting' | |
| 24. | Page 43, Core Policy 4 | *Amend small villages to include:* | Core Policy 4 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. |
| | | 'Gomeldon/East Gomeldon/West Gomeldon' | |
| | **Calne Area Strategy** | | |
| 25. | Page 55, Core policy 8 | *Reinsert paragraph on the amount of employment to be identified and saved LP allocations as follows:*

Over the plan period, 6 hectares of employment will be provided, including: | Drafting error, omitted from the Pre-Submission Document. |
| | | | Land East of Beversbrook Farm and Porte Marsh Industrial Estate | Saved North Wiltshire District Plan Allocation | 3.2 hectares | | |
| | **Chippenham Area Strategy** | | |
| 26. | Page 56, Para 5.47 | *Add sentence to end of paragraph to read:*

'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.' | For clarity No strategic sites at Corsham but there are strategic sites in the Corsham community area i.e. Chippenham sites. |
| 27. | Page 57, Para 5.48, Bullet Point 12 | *Add following sentence to end of bullet point:*

'Contributions towards enhanced health and emergency services provision will be sought, where appropriate, from any proposed development at Chippenham, subject to | There are three strategic sites at Chippenham. It is not the case that each site will be expected to provide |

| Ref' | DPD Ref' | Change | Reason |
|---|---|---|---|
| | | viability and timing.' <br><br> Amend second sentence of bullet point to read: <br><br> 'A shared site <u>and/or contributions</u>…' | a site for new GP, Fire, Police and ambulance facilities. <br><br><br> Adds clarity. |
| 28. | Page 60, Para 5.53 | *Amend second sentence to read:* <br><br> The council ~~will work with~~ is working with developers to ensure viable and comprehensive site solutions are delivered, which will secure investment in Chippenham. | To reflect on the work already taking place in Chippenham. |
| 29. | Page 62, Figure 5.5, Chippenham Central Area of Opportunity | *Expand area of opportunity to include:* <br><br> Wiltshire College Cocklebury Road Campus | To reflect the potential for college site to be developed through rationalisation of Cocklebury Road site and potential release of land for development. College has an important role in driving the economy. |
| 30. | Page 63, Core Policy 11 | Include '<u>Grittleton</u>' within list of Small Villages. | Facilities and employment opportunities at the village support its designation as a small village. |
| 31. | Page 64, Table 5.4 | *Provide footnote to Table 5.4 (against 2,400 on strategic sites) to read:* <br><br> '<u>Includes Land South West of Abbeyfield School (Landers Field).</u>' | Provides clarity. <br><br> The numbers on strategic sites at Chippenham are inconsistent between Core Policy 2 and Table 5.4. <br> This is due to the exclusion of Landers Field from the Strategic development list in Core Policy 2. |
| | **Corsham Area Strategy** | | |
| 32. | Page 65, Para 5.58 | *Add sentence to end of paragraph to read:* <br><br> '<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. |
| 33. | Page 67, Fig 5.6 | *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.* | For consistency and clarity. |
| | **Melksham Area Strategy** | | |

Page 32

| Ref' | DPD Ref' | Change | Reason |
|---|---|---|---|
| 34. | Page 85, Para 5.77 | *Amend fourth sentence of paragraph to read:*<br><br>'Community and health facilities in Melksham are under pressure, with most GP surgeries at capacity, ~~particularly to the west of the town.~~' | To correct inaccuracy. There are no GP surgeries to the west of the town. |
| 35. | Page 85, Para 5.79 | *Amend paragraph as follows:*<br><br>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> ~~and~~.  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. |
| 36. | Page 86, Para 5.80, Bullet 9 | *Amend bullet point to read:*<br><br>'a need to improve public transport provision in the area has been identified including improving bus services, ~~improving the railway station~~ and examining whether the frequency of rail services could be increased, <u>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. |
| 37. | 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. |
| 38. | Page 89, Para 5.82 | *Amend third sentence of paragraph to read:*<br><br>'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. |
| | **Mere Area Strategy** | | |
| 39. | Page 93, Figure 5.11 | Amend map to remove the Principal Employment Area of 'woodlands Industrial Estate'. | An error in the draft evidence was identified and this site is not a 'Principal Employment Area'. |
| 40. | Page 94, Core Policy 17 | *Amend text to read:*<br><br>~~'The following Principal Employment Area will be supported in accordance with CP35: Woodlands Industrial Estate'~~ <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'. |

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| | **Royal Wootton Bassett and Cricklade Area Strategy** | | |
| 41. | Page 99, Para 5.99, Bullet point 2 | *Amend first sentence of bullet point to read:*<br><br>'...deliver infrastructure necessary in the ~~town~~ community area. In particular, improved pedestrian and cycle linkages are needed between the town centres of Royal Wootton Bassett and Cricklade 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 town~~ Royal Wotton Bassett, and additional...' | To make it clear what towns the text is referring to. |
| 42. | Page 100, Para 5.99, Bullet point 10 | *Amend last sentence to read:*<br><br>'These include Ballards' Ash Sports Hub, Cricklade Country Way and the restoration of the Wilts and Berks ~~Canal~~ and Thames and Severn canals.' | Recognises the need to identify how improvements to the Thames and Severn canal can be delivered. |
| 43. | Page 102, Fig 5.13 | *Change marked route of Wilts and Berks canal:*<br><br>The canal does not stop at Royal Wootton Bassett as shown but goes on eastwards on its historic route to the boundary with Swindon Borough. | To improve accuracy of plan. |
| 44. | 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. |
| 45. | Page 104, Para 5.101 | *Amend paragraph to read:*<br><br>'...future growth in Swindon should be considered holistically and with appropriate co-operation between neighbouring authorities and involve collaborative working with the Wiltshire and Swindon Local Enterprise Partnership and the Wiltshire and Swindon Local Nature Partnership.' | To acknowledge collaborative working and the Wiltshire and Swindon Local Nature Partnership. |
| | **Salisbury Area Strategy** | | |
| 46. | Page 106, Para 5.109 | Add bullet to list at paragraph 5.109 to read:<br><br>'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' | In response to representations. For consistency with the adopted South Wiltshire Core Strategy. |
| 47. | Page 106, Para 5.109, Bullet point 8 | *Amend second sentence of bullet point to read:*<br><br>'...These will include ~~expansion of the fire~~ | To add flexibility to the outcome. |

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| | | ~~station~~ <u>alterations to the Wiltshire Fire and Rescue Service infrastructure</u> to serve new development, and improvements to green infrastructure in the city.' | |
| 48. | Page 110, Key projects map 5.115 | *Amend annotation on first map as follows:*<br><br>'~~Longhedge 450 dwellings 8ha employment~~'<br>'<u>Hampton Park 500 dwellings 0 ha employment</u>'. | To correct incorrect reference on map. |
| | **Southern Wiltshire Area Strategy** | | |
| 49. | Page 118, Fig 5.16 and Page 119, Core Policy 24 | *Amend figure and core policy:*<br><br>Add <u>Laverstock and Ford</u> to map and recognise in Core Policy 24 within list of Small Villages. | To recognise the existence of the settlements of Laverstock and Ford. |
| | **Tidworth Area Strategy** | | |
| 50. | Page 122, Para 5.137, Bullet 4 | *Amend third sentence of bullet point to read:*<br><br>'In addition the fire and rescue service <u>would consider relocating the fire station within</u> ~~are considering relocating~~ Ludgershall ~~fire station to Tidworth~~ and additional facilities may be required.' | No reason to limit relocation. |
| | **Trowbridge Area Strategy** | | |
| 51. | Page 130, Para 4.147, Bullet 5 | *Amend first sentence of bullet point to read:*<br><br>'there is a requirement to provide a <u>site for a</u> secondary school to the south east of Trowbridge...' | Clarification. |
| 52. | Page 131, Para 5.147, Bullet point 8 | *Add sentence at end of bullet to read:*<br><br>'<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. |
| 53. | Page 132, Para 5.147 Bullet point 16 | *Add sentence at end of bullet to read:*<br><br>'<u>Flood mitigation should relate to development impact only.</u>' | Clarification. |
| 54. | Page 133, Fig 5.19 and Page 262, Appendix A map, Ashton Park Urban Extension, South East of Trowbridge | *Amend maps to:*<br><br>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. |
| 55. | Page 133, Fig 5.19 | *Amend map to show:*<br><br>Significant permissions at Green and East of Paxcroft Mead. Show Hilperton Gap relief road which will be completed during the first | Up to date position and clarification. |

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| | | part of the plan period. | |
| 56. | 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. |
| 57. | Page 134, Para 5.150 | *Insert new wording at the end of paragraph to read:*<br><br>'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.' | In response to representations received and to add flexibility to approach. |
| | **Warminster Area Strategy** | | |
| 58. | Page 142, Para 5.153 | *Insert new sentence in paragraph as follows*:<br><br>'...Cardiff to Portsmouth railway line. The town has strong functional linkages for employment and shopping with Frome.Warminster has been identified...' | Recognises the relationship of Frome to the west Wiltshire towns. |
| | **Westbury Area Strategy** | | |
| 59. | Page 148, Para 5.162 | *Amend paragraph to read:*<br><br>'Overall, the town should not seek to compete with the larger nearby centres, including Frome, but rather consolidate...' | Recognises the relationship of Frome to the west Wiltshire towns. |
| 60. | Page 149, Para 5.163, Bullet point 9 | *Amend bullet to read:*<br><br>'...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.' | To add clarity. |
| 61. | Page 149, Para 5.163, Bullet point 10 | *Add a 5th point to list to read:*<br><br>'V. The rail connection to the former Lafarge site should be retained.' | Consistent with policy Core Policy 65 Movement of Goods.<br><br>Rail sidings at former Imerys Quarry, Salisbury are being retained. |
| | **Chapter 6 - Core Policies** | | |
| | **Core Policy 34 - Additional employment land** | | |
| 62. | Page 161, Core Policy 34 | *Amend i. to read:*<br><br>'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' | Improve clarification and consistency with Core Policy 2 as defined in Para 6.13. |
| | **Core Policy 35 – Existing employment sites** | | |
| 63. | Page 163, Core Policy 35, Para 1 | *Amend paragraph to read:*<br><br>'Wiltshire's Principal Employment Areas (as | In order to make the policy more flexible with respect to the |

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|  |  | listed in the Area Strategies) ~~will~~ should be retained for employment purposes within use classes B1, B2 and B8 to safeguard their contribution to the Wilshire economy and the role and function of individual towns. Proposals for renewal and intensification of the above employment uses within these areas will be supported. | Principal Employment Areas. |
| 64. | Page 163, Core Policy 35, Para 2 | *Amend paragraph to read:*<br><br>'~~Elsewhere~~ Within the principal settlements, market towns ~~and~~, local service centres and Principal Employment Area's proposals for the redevelopment of land or buildings previously or currently used for activities falling within use classes B1, B2 and B8 must demonstrate that they meet and will be assessed against ~~s~~ ~~at least one of~~ the following criteria:' | In order to make the policy more flexible with respect to the Principal Employment Areas and for clarity. |
| **Core Policy 38 - Retail and leisure** |  |  |  |
| 65. | Page 166, Para 6.27 | *Amend sentence of paragraph to read:*<br><br>'... assessment of impacts on centres. However, ~~there is concern within Wiltshire~~ evidence has identified that a succession of planning applications...... '.<br><br>Footnote to be added after 'evidence' to read:<br><br>'Wiltshire Council, Town Centre and Retail Study, GVA Grimley, page 201, para 9.3 and 9.4' | To ensure it is clear that the requirement is based on comprehensive qualitative and quantitative evidence. |
| **Core Policy 40 - Hotels** |  |  |  |
| 66. | Page 169, Core Policy 40, Para 1 | *Amend paragraph to read:*<br><br>'Proposals for new hotels, bed and breakfasts, guesthouses or conference facilities, together with the sensitive extension, upgrading and intensification of existing tourism accommodation facilities 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. |
| **Core Policy 41 - Climate change** |  |  |  |
| 67. | Page 170, Core Policy 41, Para 6.33 | *Amend second sentence of paragraph to read:*<br><br>'The government has pledged to reduce the UK's total carbon emissions by at least 34% by 2020, and by at least 80% by 2050, relative to 1990 levels. The government has also pledged for 15% of energy to be derived from renewable sources by 2020'.<br><br>[Keep footnote as presented within pre-submission draft]. | Plan period goes beyond 2020 so reference to 2050 target is considered appropriate. |
| **Core Policy 42: Standalone renewable energy installations** |  |  |  |
| 68. | Page 174, Para 6.37 | *Add following sentence at end of paragraph:*<br><br>'It should also be noted that some renewable energy technologies require additional | For clarification. Supporting text is considered more appropriate place |

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| | | permissions over and above planning, such as abstraction licenses, flood defence consents and environmental permits'. | for this text, rather than policy. |
| 69. | Page 175, Core Policy 42 | *Add new criterion viii:*<br><br>'best and most versatile agricultural land.'<br><br>*Remove* 'and' *from end of criterion vi and remove full stop and insert* 'and' *at end of criterion vii.* | To ensure that potential impacts on best and most versatile agricultural land are taken into account. |
| | **Core Policy 43 - Affordable Housing** | | |
| 70. | Page 175, Para 6.39 | *Amend third sentence of paragraph to read:*<br><br>'Core Policy 2 identifies the requirement for at least 37,000 new homes to be provided over the plan period including affordable homes.' | Consistency with Core Policy 2. |
| | **Core Policy 47 - Gypsies and travellers** | | |
| 71. | Page 183, Para 6.57 | *Amend paragraph to read:*<br><br>'In March 2012 the government published the National Planning Policy Framework and 'Planning Policy for Travellers'. These documents In 2011, the government published a draft Planning Policy Statement on planning for traveller sites which includes the general principle of aligning planning policy for travellers more closely with other forms of housing. It also 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 which define broad locations where sites would be appropriate and against which potential sites will be tested. The policy identifies a specific requirement for new pitches to 2021. The criteria...'<br><br>*Add footnote to signpost new guidance to replace footnote 60.* | Update to reflect publication of the NPPF and Planning Policy for Travellers. |
| 72. | Page 185, Core Policy 47 | *Split criterion iii by dividing into two points to read:*<br><br>iii the site can be properly serviced and is supplied with essential services, such as water, power, sewerage and drainage, and waste disposal.<br><br>iv The site must also be large enough to provide adequate vehicle parking, including circulation space, along with residential amenity and play areas<br><br>*Amend criteria iv to read:*<br><br>'...schools and essential health services. This will be defined in detail in the methodology outlined in the Site Allocations DPD, and...' | For consistency with adopted S Wilts Core Strategy and for better consistency with new national policy.<br><br>General point of consistency with SWCS raised by a number of respondents<br><br>Implementation of policy should not be left to a subsequent document. |

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| | | Change criterion iv to v. <br> Change criterion v to vi. <br><br> *Add additional criterion to bottom of criteria as follows:* <br><br> 'vii adequate levels of privacy should be provided for occupiers.' <br><br> 'viii development of the site should be appropriate to the scale and character of its surroundings and existing nearby settlement. <br><br> '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.'' | |
| 73. | Page 186, Core Policy 47, monitoring and review section of policy | *Amend so sentence reads:* <br><br> 'Number of ~~approved~~ permanent and transit Gypsy and Traveller pitches and Travelling show people plots to be monitored through the Wiltshire Monitoring Framework.' | For clarity. |
| | **Core Policy 48 - Supporting rural life** | | |
| 74. | Page 186, Para 6.60 | *Add to bulleted list:* <br><br> 'provision of meeting halls and places of worship' | Provision of meeting halls and places of worship will help build resilient communities. |
| 75. | Page 187, Para 6.63 | *Amend first sentence of paragraph to read:* <br><br> 'Proposals to convert redundant buildings for employment, tourism or residential uses, community uses, meeting rooms or places of worship will need to fulfil the requirements set out in Core Policy 48.' | To recognise community uses, meeting rooms and places of worship as conversion opportunities. |
| 76. | Page 188, Core Policy 48, Para 1 | *Add additional sentence at the end of Para 1 as follows:* <br><br> '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.' | Provides a mechanism to ensure that development delivered through this policy is essential. |
| 77. | Page 188, Core Policy 48 | *Amend sentence after heading 'Reuse of redundant agricultural buildings' to read:* <br><br> 'Proposals to convert redundant ~~agricultural~~ buildings for employment, ~~and~~ tourism, cultural and community uses will be supported where it satisfies the following criteria...' <br><br> *Amend heading in policy to refer to 'redundant buildings' only.* | Widens the opportunity to utilise the appropriate use of redundant buildings to accord with national planning policy framework provisions. |
| | **Core Policy 50 - Biodiversity** | | |
| 78. | Page 191, Para 6.71 | *Amend third sentence of paragraph to read:* | Nature Improvement Areas |

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| | | '...particularly valuable where it contributes towards ~~landscape scale projects~~ Nature Improvement Areas or other landscape scale projects identified by Local Nature Partnerships.' | and Local Nature Partnerships have recently been given status in planning through the NPPF. Also provides useful clarity on the term 'landscape scale projects'. |
| **Core Policy 51 - Landscape** | | | |
| 79. | Page 195, Para 6.77 | *Add to last sentence of Para 6.77 to read:*<br><br>'Development affecting Stonehenge and Avebury World Heritage Site and its setting should be considered in light of Core Policy 59, 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.' | The cross-boundary effects of development in Wiltshire on the setting of the Bath World Heritage Site have only recently come to light through discussions. |
| 80. | Page 196, Core Policy 51, Para 1 | *Amend last sentence to read:*<br><br>'In particular, proposals will need to demonstrate that the following aspects of landscape character have been ~~considered~~ conserved and where possible enhanced.' | The term 'considered does not require the applicant to do anything. |
| **Core Policy 52 - Green Infrastructure** | | | |
| 81. | Page 199, Core Policy 52, Para 1, Bullet point 5 | *Amend bullet point to read:*<br><br>'identify and provide opportunities to enhance and improve linkages between the natural and historic landscapes of Wiltshire' | Previous wording did not require the applicant to do anything. |
| **Core Policy 53 - Wilts and Berks and Thames and Severn canals** | | | |
| 82. | Page 200, Para 6.96 | *Add sentence at end of paragraph to read:*<br><br>'The use of SUDS should be encouraged wherever possible, unless this could risk groundwater resources through infiltration.' | Possible risk to groundwater from canals due to poor water quality. |
| 83. | Page 200, Para 6.98 | *Amend first sentence of paragraph to read:*<br><br>'The Kennet and Avon Canal is a significant asset within Wiltshire's sustainable transport and green infrastructure network...' | Need to recognise the K&A's function as a sustainable transport route. |
| 84. | Page 201, Core Policy 53 | *Amend Core Policy 53, fourth paragraph to read:*<br><br>'Proposals for the reinstatement of canal along these historic alignments or any alternative alignments 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. |
| **Core Policy 55 - Air Quality** | | | |
| 85. | Page 204, Core Policy 55 | *Add criteria to policy:*<br><br>'Where appropriate contributions will be sought toward the mitigation of the impact a | This should be a tool highlighted in the policy. |

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| | | development may have on levels of air pollutants.' | |
| **Core Policy 57 - Design and place shaping** | | | |
| 86. | Page 207, Para 6.126 | *Add following text to end of Para 6.126:*<br><br>'… 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.' | Responds to issues raised in rural workshops. Recognises status of Village Design Statements. |
| 87. | Page 208, Core Policy 57, Criteria ix | *Amend criterion ix to read:*<br><br>'…are designed to create places of character which are legible, safe and accessible.' | Road safety for small scale developments not included elsewhere in the plan. |
| 88. | Page 209, Core Policy 57, Criterion xii | *Amend criterion xii to read:*<br><br>'the use of high standards of building materials, finishes and landscaping, including the provision of street furniture and ~~public art where appropriate~~ the integration of art and design in the public realm.' | Minor amendments will bring clarity to the policy. |
| **Core Policy 58 - Conservation of the built Environment** | | | |
| 89. | Page 209, Para 6.130 | *Add footnote to 'World Heritage Site' in 6.130 to read:*<br><br>'The policy recognises that the setting of the Bath World Heritage site may include 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.' | Core strategy needs to recognise that the Council will work with Bath and North East Somerset to protect this international heritage asset. |
| 90. | Page 211, Core Policy 58, Para 2 | *Amend criteria to read:*<br><br>i. archaeological remains ~~and their setting~~<br>ii. ~~the~~ World Heritage Site<u>s within and adjacent to Wiltshire</u><br>iii. buildings and structures of special architectural or historic interest ~~and their settings~~<br>iv. the special character or appearance of conservation areas ~~and their settings~~<br>v. historic parks and gardens ~~and their setting~~<br>vi. important landscapes, <u>including registered battlefields</u> and townscapes | Minor amendments will bring clarity to the policy; to recognise importance of registered battlefields; and recognise Bath WHS setting includes parts of Wiltshire. |
| 91. | Page 211, Core Policy 58, Para 4 | *Amend paragraph to read:*<br><br>'…benefits will be exploited, <u>where appropriate and in a sensitive manner</u>, including…' | Minor amendments will bring clarity to the paragraph. |
| 92. | Page 211, Core Policy 58 | *Add following text to 'monitoring and review':*<br><br>'Where appropriate at risk surveys will be carried undertaken to ensure there is an understanding of what is at risk.' | Response to statutory response. |
| **Core Policy 59 - World Heritage Site** | | | |
| 93. | Page 212, Para 6.137 | *Amend Para 6.1.37 to read:* | Minor amendments more closely reflect |

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| | | 'Wiltshire's World Heritage Site (WHS)...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 ~~OUV of the~~ Site and sustain its OUV.' | the obligations under the UNESCO World Heritage Convention (1972) |
| 94. | Page 212, Para 6.138 | *Amend paragraph to read:*<br><br>"… ~~comprising its significance, authenticity and integrity.~~ 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 OUV of~~ 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."P | Adds clarity and accuracy |
| 95. | Page 212, Para 6.139 | *Amend second sentence of paragraph to read:*<br><br>'…mortuary practices ~~from around~~ through 2,000 years…Their careful design in relation…' | Minor amendments for accuracy |
| 96. | Page 212, Para 6.140 | *Amend paragraph to read:*<br><br>Sentence 1: '…impact on the Site and its attributes of OUV.'<br><br>Sentence 5: '…impact on the WHS and its attributes of OUV.' | For clarity |
| 97. | Page 212, Para 6.141 | *Amend paragraph to read:*<br><br>4th sentence '… management of the site in order to sustain its OUV, taking into account….' | For consistency |
| 98. | Page 213, Para 6.142 | *Amend paragraph to read:*<br><br>Second sentence: '...no adverse effect upon the Site and its attributes of OUV.' | For consistency |
| 99. | Page 213, Para 6.143 | *Amend paragraph to read:*<br><br>Last sentence: '…to assess impact on the WHS and its attributes of OUV.' | For consistency |
| 100. | Page 213, Para 6.144 | *Amend paragraph to read:*<br><br>' …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.' | For consistency |

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| 101. | Page 214, Core Policy 59 | *Amend policy to read:*<br><br>The Stonehenge, Avebury and Associated Sites World Heritage Site<br><br>The Outstanding Universal Value (OUV) of the World Heritage Site ~~and its setting~~ will be protected and enhanced by:<br><br>i. giving precedence to the protection of the ~~OUV of the~~ World Heritage Site and its setting<br><br>ii. development not adversely affecting the ~~OUV of the~~ World Heritage Site <u>and</u> its <u>attributes of OUV</u> ~~significance, authenticity, or intergrity, or its setting.~~ This includes the physical fabric, character and appearance, setting or views into or out of the World Heritage Site<br><br>iii. seeking opportunities to support and ~~sustain~~ <u>maintain</u> the positive management of the ~~OUV of the~~ 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<br><br>iv. requiring developments to demonstrate that full account has been taken of their impact upon the ~~OUV of~~ the 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.<br><br>Consideration of opportunities for enhancing the ~~OUV~~ <u>World Heritage Site and its attributes of OUV</u> should also be demonstrated. | Minor amendments to the policy will clarify that the setting contributes to OUV but is not of OUV itself.<br><br>It will add clarity by removal of specialised UNESCO terminology<br><br>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.<br><br>Order of final two sentences in response to representations has changed to clarify meaning. As drafted, it could be interpreted to mean that the enhancement issue is referring to renewable energy only. |
| | **Core Policy 60 - Sustainable transport** | | |
| 102. | Page 215, Core Policy 60, Para 1 and final paragraph | *Amend paragraph to read:*<br><br>'…to help reduce the need to travel <u>particularly by private car</u>'<br><br>*Delete final paragraph from Core Policy 60 and insert as supporting text at the end of Paragraph 6.146.* | To clarify meaning and correct drafting error. |
| | **Core Policy 61 - Transport and development** | | |
| 103. | Page 216, Core Policy 61, Para 1 | *Amend paragraph to read:*<br><br>'…to help reduce the need to travel, <u>particularly by private car</u>,' | To clarify meaning. |
| | **Core Policy 63 - Transport strategies** | | |
| 104. | Page 218, Core Policy | *Amend criterion (vi), as follows:* | To correct drafting |

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| 63 | | 'interchange enhancements that are <u>safe</u> and accessible by all' | error. |
| **Core Policy 65 - Movement of goods** | | | |
| 105. | Page 221, Paragraph 6.163 | *Insert wording at the end of paragraph as follows:*<br><br><u>'Further details on the council's approach to freight management are contained in the Wiltshire Local Transport Plan 2011-2016 Freight Strategy.</u>' | In the interests of clarification. |
| **Core Policy 66 - Strategic transport network** | | | |
| 106. | Page 222, Paragraph 6.168 | *Insert new paragraph after Paragraph 6.168, as follows:*<br><br><u>'The strategic transport network is made up of the following:</u><br><br><u>(1) The national primary route network (including the strategic road network):</u><br><br><u>Strategic Road Network - M4, A303, A36, A419</u><br><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><br><br><u>(2) The strategic advisory freight route network – M4, A303, A350, A36, A419, A34 (east of Wiltshire).</u><br><br><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><br><br><u>(4) The rail network:</u><br><br><u>Berks & Hants Line (London - South West England via Westbury)</u><br><u>Greater Western Main Line (London - Bristol/South Wales)</u><br><u>Heart of Wessex Line (Bristol - Weymouth)</u><br><u>Waterloo-Exeter Line</u><br><u>Wessex Main Line (Cardiff - Portsmouth)</u><br><u>Westbury-Swindon Line (via Melksham)</u>' | In the interests of clarification. |
| 107. | Page 223, Core Policy 66 | *Make the following changes to policy:*<br><br>*Insert footnote to clarify that the bus network is not shown on the key diagram.*<br><br>*Insert* '<u>neighbouring authorities</u>' *before other agencies in first sentence of policy.* | In the interests of clarification. |

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| | | *Insert* '(including the strategic road network)" after 'the national primary route network" *in point (1).*<br><br>*Reword point (3) as follows:*<br><br>'The <u>strategic</u> ~~key~~ bus <u>network</u> ~~route~~.'<br><br>Amend first paragraph:<br><br>Replace ~~'assist employment'~~ with '<u>support development</u>'.<br><br>*Insert paragraph at end of policy to read:*<br><br>'<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>.' | |
| | **Core Policy 68 - Water Resources** | | |
| 108. | Page 224, Para 6.173 | *Amend Para. 6.173 Second sentence to read:*<br><br>'Three River Basin Management Plans have been prepared to meet the requirements of the Water Framework Directive for Wiltshire and surrounding areas~~.~~, <u>namely</u> the Severn, <u>South West</u> <u>and</u> 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>'. | Environment Agency has recently announced the development of River Catchment Management Plans, which will provide greater levels of detailed action for delivery of Water Framework Directive (WFD) targets at a local level. |
| 109. | Page 225, Core Policy 68, Para 1 | *Amend first paragraph to read:*<br><br>'Development must not prejudice the delivery of the actions and targets of the relevant River Basin <u>or Catchment</u> Management Plan, and should contribute to their plan where possible'. | Environment Agency has 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. |
| 110. | Page 225, Para 6.176 | *Amend third sentence of paragraph to read:*<br><br>'Development <u>within the catchment</u> ~~in close proximity to the river~~ has the potential to have a detrimental effect upon its qualifying features…' | To appropriately reference the fact that development within the River Avon Catchment has the potential to present adverse impacts. |
| | **Chapter 8 - Glossary** | | |

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| 111. | Page 229, Glossary and common acronyms | *Add definition of 'Brownfield site' to glossary.* | Technical term; clear definition would add value and benefit the reader. |
| 112. | Page 229, Glossary and common acronyms | *Add definition of 'Environment Agency' to glossary.* | Definition of the roles and responsibilities of this organisation would be to the benefit of the reader. |
| 113. | Page 229, Glossary and common acronyms | *Add definition of 'Green Infrastructure' to Glossary:* | Definition of GI required for clarity. |
| | **Development templates for strategic allocations** | | |
| | **Land at Kingston Farm, Bradford-on-Avon** | | |
| 114. | Page 236, Heading | *Add generic text under heading 'Appendix A: Development templates for strategic allocations'*<br><br>'The requirements in these development templates are sought to serve the proposed development and mitigate any associated impact of the development.' | |
| 115. | Page 236, Land at Kingston Farm, Bradford on Avon development template | *Under 'Key Objectives' amend 4<sup>th</sup> bullet to read*:<br><br>'To facilitate the retention and expansion of ~~an existing~~ two local employers, already located in close proximity to the site' | For accuracy |
| 116. | Page 237, Land at Kingston Farm, Bradford on Avon development template | *Under 'Transport', amend bullet 1 to:*<br><br>'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).' | For clarity |
| 117. | Page 237, Land at Kingston Farm, Bradford on Avon development template | *Under 'Social and Community' amend fifth bullet to read:*<br><br>'Financial contributions required towards the extension of the existing cemetery, or a~~A~~dditional 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.' | For clarity |
| 118. | Page 237, 'Physical Requirements' section within Bradford on Avon development template | *Make changes to 'Physical Requirements' section as follows:*<br><br>**Physical Requirements**<br>• ~~Development will require up-sizing of sewers through the town, construction of on-site sewers and improvements~~ | To reflect updated information from Wessex Water and the promoters of the site. |

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| | | ~~will be required to the downstream network.~~ | |
| | | • ~~Dedicated pumping stations and rail and river crossings to the sewage treatment works (which is to the west of the site) would be required.~~ | |
| | | • <u>Foul and surface water drainage from the site will need to be adequately addressed. The developer is 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> | |
| | | • <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> | |
| | | • <u>Improvements to the Springfield pump station are required and an option study is required to agree these improvements.</u> | |
| | | • ~~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.~~ | |
| | | • ~~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.~~ | |
| | | • ~~Following this a conclusion will be made about which option will be pursued.~~ | |

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| 119. | Page 238, Land at Kingston Farm, Bradford on Avon, development template | *Under 'Green Infrastructure' add an additional bullet:*<br><br>'<u>There are a number of large trees on the site that should be maintained and masterplanned into the proposed development</u>'. | This is considered to be a valid point, and reference to the large trees would be appropriate in the development template. |
| | **North Chippenham Strategic Site** | | |
| 120. | Page 240, North Chippenham strategic site development template | *Amend map to show extent of the strategic site that reflects the site which is the subject of a current planning application.* | Clarification of site boundaries. |
| 121. | Page 242, North Chippenham Strategic Site development template. | *Under 'Landscape' amend as follows:*<br><br>*Amend first bullet to read:*<br><br>'Employment provision on the west of the site will form a gateway to the town and should be of ~~outstanding~~ <u>high quality</u> design, incorporating...'<br><br>*Amend fourth bullet to read:*<br><br>'The required road link ~~between the proposed development and Bird's Marsh Wood~~ shall be appropriately mitigated in landscape and visual terms'. | Clarification. Current wording is unquantifiable. |
| | **Rawlings Green, East Chippenham Strategic Site** | | |
| 122. | Page 244, Rawlings Green, East Chippenham development template | *Amend 'Use' to read:*<br><br>'6 hectares of employment land, 700 houses, ~~and~~ community facilities <u>and open space'</u>.<br><br>*Amend bullet 1 under 'Key Objectives' to read:*<br><br>'To deliver a sustainable urban extension containing 6 ha of employment land, 700 dwellings ~~and~~, community facilities <u>and open space</u> which will contribute to improving the critical mass of the town thereby supporting improved services and helping to deliver enhanced infrastructure.' | To better reflect the emerging development proposals. |
| 123. | Page 245, Rawlings Green, East Chippenham development template | *Under 'Physical Requirements':*<br><br>*Amend bullet 1 to read:*<br><br>'A drainage strategy is required, to be agreed with Wessex Water <u>or the 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 ~~sewers~~ <u>drainage infrastructure</u> to ~~an adoptable~~ <u>the appropriate</u> standard.' | 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. |

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| | | *Amend bullet 2 to read:*<br><br>'Financial contribution required for off-site works to mitigate against the effect of this <u>proposed</u> development and reduce the risk of <u>off-site or</u> downstream sewer flooding. 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 sewer flooding.</u>'<br><br>*Amend bullet 3 to read:*<br><br>'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 will <u>be required to</u> confirm the extent of <u>any</u> off-site reinforcement <u>necessary to serve the development.</u> Development <u>of a particular phase</u> should not proceed <u>unless that phase can be adequately supplied with mains water. A sustainable drainage scheme will be provided to an appropriate standard and arrangements for its long term operation will be agreed.</u>'<br><br>*Amend bullet 5 to read:*<br><br>'A SFRA Level 2 assessment will be required to ensure that <u>the proposed</u> development <u>including associated infrastructure does not unacceptably</u> ~~is not~~ encroach<u>ing</u> within the flood zone and to inform the sequential test'.<br><br>*Amend Bullet 6 as follows:*<br><br>'<u>Proposed</u> ~~D~~development types will need to recognise <u>and address</u> the development vulnerability of the area i.e. Groundwater Source Protection Zone 2.'<br><br>*Amend bullet 7 as follows:*<br><br>'Overhead <u>power</u> lines cross the site. <u>These should be placed underground subject to viability, technical and practical considerations. Alternatively,</u> in order to minimise costs, wherever possible, existing overhead <u>power</u> lines 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 | |

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| | | not practical, or where developers choose to lay out their proposals otherwise, then agreement will be needed as to how ~~these~~ the power cables will be dealt with, including agreeing costs and identifying suitable alternative routing for the circuits.' | |
| 124. | Page 245, Rawlings Green, East Chippenham development template | *Under 'Transport':*<br><br>*Amend bullet point 1 to read:*<br><br>'Provision of and/ or contributions towards the transport infrastructure, required to serve the development in line with the Chippenham Transport Strategy, where relevant.'<br><br>*Amend bullet point 2 to read:*<br><br>'Development is required to deliver a ~~the~~ road link/connection across the railway in conjunction with North Chippenham and enhancements to Cocklebury Road, necessary to serve the development.'<br><br>*Amend bullet point 3 to read:*<br><br>'The proposed development will provide and/or contribute towards, 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 will be included within the proposed development and/ or off-site contributions towards relevant improvements will be required as indentified in the IDP.' | To provide more clarification to improve effectiveness of requirements. |
| 125. | Page 245, Rawlings Green, East Chippenham development template | *Under 'social and community':*<br><br>*Amend bullet 3 to read:*<br><br>'The proposed development will include ~~N~~new facilities and/ or an off-site financial contribution~~s~~, 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.'<br><br>*Amend bullet 6 to read:*<br><br>'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.' | To provide more clarification to improve effectiveness of requirements. |
| 126. | Page 246, Rawlings Green, East Chippenham | *Under 'Green Infrastructure':* | To provide more clarification to improve |

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| | development template | *Amend bullet 1 to read:*<br><br>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.'<br><br>*Amend bullet 2 to read:*<br><br><u>'A Riverside Park is to be provided at Rawlings Green.</u> Riverside access <u>will</u> ~~to~~ be extended alongside the site from Monkton Park <u>(</u>Riverside Drive<u>)</u> ~~linking with LBUR1~~ and <u>link to</u> the wider countryside to the north.'<br><br>*Amend bullet 3 to read:*<br><br>'Provision for children's play, accessible natural green space, sports and allotments to be made to <u>relevant national</u> or Wiltshire standards.'<br><br>*Amend bullet 4 to read:*<br><br>'Development of <u>the Riverside Park and other structural public open space</u> ~~a country park~~ will require a <u>long term management plan and an appropriate</u> funding mechanism to implement a long term management plan.' | effectiveness of requirements. |
| 127. | Page 246, Rawlings Green, East Chippenham development template | *Under 'Ecology':*<br><br>*Amend bullet 1 as follows:*<br><br>'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</u> ~~with~~ mitigation, as necessary.' | Clarification of requirements for site. |
| 128. | Page 246, Rawlings Green, East Chippenham development template | *Under 'Archaeology and Historical Interest' add bullet:*<br><br><u>'Further archaeological investigations should be carried out to inform any planning application'.</u> | To ensure that undiscovered archaeology has been recorded. |
| | **South West Chippenham Strategic Site** | | |
| 129. | Page 248, Appendix A, South West Chippenham Strategic Site Map | *Amend map to show land within the Rowden Conservation Area currently shown as indicative housing to be green space instead (south west corner).* | In response to representations received.<br><br>The strategic sites process had regard to the Rowden Conservation area and considered that proposed housing could be |

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| | | | 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. |
| 130. | Page 248, Appendix A, South West Chippenham Strategic Site South West Strategic Site key Objectives | *Amend Key Objectives Bullet Point 5 as follows:*<br><br>'Development to enhance <u>and protect the landscape quality and biodiversity of</u> the River Avon Corridor, <u>promoting its recreational use,</u> and the sites <s>its</s> connectivity to the town and wider countryside <u>through enhanced pedestrian and cycle access along the corridor</u>.' | In response to representations received.<br><br>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. |
| 131. | Page 248, South West Chippenham development template. | *South West Chippenham strategic site map amend map as follows:*<br><br>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. |
| 132. | Page 249, South West Chippenham Proforma | *Under 'physical requirements' add bullet:*<br><br><u>'Provide recognition that the extraction of minerals is likely to be problematic due to high water table and poor quality of minerals</u>. ' | Advice to date indicates that it would be uneconomic to extract the minerals due to the amount, quality and high water table. |
| | **Land at Horton Road, Devizes** | | |
| 133. | Page 254, Land at Horton Road, Devizes development template. | *Under 'Green Infrastructure and Biodiversity': amend bullet 2 to read:*<br><br>Development should not impinge on the <u>function of</u> footpath BCAN6.<br><br>*Under 'Landscape' amend bullet 1 to read:*<br><br>The development should provide an appropriate and enhanced entrance to Devizes in keeping with the local landscape and townscape character. <s>Large and v</s>Visually intrusive buildings should be avoided, particularly facing the AONB or entrances to the town. | To increase flexibility.<br><br><br>To provide more clarification to improve effectiveness of requirements. |
| | **Ashton Park Urban Extension, South East of Trowbridge** | | |

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| 134. | Page 262, Ashton Park Urban Extension development template. | *Ashton Park Urban Extension, South East of Trowbridge strategic site map*<br><br>*Amend map as follows:*<br><br>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.<br><br>To ensure the site adjoins the continuous built edge of Trowbridge |
| 135. | Page 263, Appendix A. Ashton Park Urban Extension, South East of Trowbridge development template | *Under 'Green infrastructure' amend second bullet point to read:*<br><br>'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. |
| 136. | Page 263, Ashton Park Urban Extension development template. | *Under 'Physical Requirements' amend bullet 6 to read:*<br><br>'Capacity improvements to water supply and waste networks <u>to serve the development</u>'.<br><br>*Amend bullet 8 to read:*<br><br>'Reinforcement of the electricity network and primary sub-station <u>to serve the development</u>'.<br><br>*Amend bullet 9 to read:*<br><br>'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. |
| 137. | Page 263, Ashton Park Urban Extension development template | *Under 'Social and community' amend bullet 4 to read:*<br><br>'Financial contributions towards childcare provision facilities or on site provision <u>to serve the development</u>'.'<br><br>*Amend bullet 5 as follows:*<br><br>'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. |
| 138. | Page 263, Ashton Park Urban Extension development template. | *Under 'Ecology' amend bullet 1 to read:*<br><br>'100m woodland/ parkland buffer between <u>all ancient woodland, including</u> Biss Wood <u>and Green Lane Wood,</u> and built development'. | For clarity |
| | **West Warminster Urban Extension** | | |
| 139. | Page 265, West Warminster Urban | *Under 'Use' add a paragraph:* | Representations have highlighted |

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| | Extension development template. | 'Note: the area identified as 'indicative mixed use' represents an area of land that is much larger than that required to deliver 900 homes, 6 ha employment and associated facilities. The final development area is yet to be identified through a comprehensive masterplannning process with the local 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.' | that the area is much larger than that that could accommodate 900 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. |
| | **Land at Station Road, Westbury** | | |
| 140. | Page 273, Land at Station Road, Westbury, development template | *Under 'Transport' amend bullet 2 to read:* <br><br> 'Provision of a link road connecting Station Road and Mane Way, via a new railway bridge crossing, part of the cost of this is already held in a bond.' | For clarification. |
| 141. | Page 273, Land at Station Road, Westbury, development template | *Under 'Social and Community' remove bullet 1:* <br><br> ~~Contribution to development of childcare provision at Leigh Park.~~ | Wiltshire Council's intention is to offer the nursery site for development in partnership with a commercial operator. |
| 142. | Page 273, Land at Station Road, Westbury, development template | *Under 'Physical Requirements' remove bullet 9:* <br><br> ~~Re-instate former platform at Westbury Station.~~ | 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. |
| | **Appendix C - Housing Trajectory** | | |
| 143. | Page 311, Appendix C: Housing Trajectory | *Delete text and diagram in relation to:* <br><br> 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 |
| 144. | Page 311, Appendix C: Housing Trajectory | *Add text and diagrams in relation to:* <br><br> 1. Housing five year land supply statement <br> 2. Gypsy and Travellers five year land supply statement <br> 3. Housing trajectory <br> 4. Affordable housing trajectory | Update to reflect NPPF requirements, and planning policy for traveller sites in response to consultation comments received to demonstrate the strategy plans for a |

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| | | | 5 year supply including contingency. |
| 145. | Page 311, Appendix C: Housing Trajectory | *Add:*<br><br>Detailed summary of land supply (from the Annual Monitoring Report) | To provide clear and up to date evidence base and greater transparency. |
| 146. | Page 312, Appendix C: Housing Trajectory | *Figure C.1 replace with correct diagram* | Drafting error. The wrong trajectory has been included at Figure C.1. |
| | **Appendix D - Saved Policy** | | |
| 147. | Page 315, Appendix D: Saved Policies and policies replaced | *Remove Policy HC2 Devizes Hospital from list of saved policies* | Policy to be removed as PCT ownership is expected to continue. |
| 148. | Page 315, Appendix D: Saved Policies and policies replaced | *Remove policies HC10 and HC11 from list of saved policies* | Policies to be removed as PCT ownership is expected to continue. |
| 149. | Page 318, Appendix D: Saved Policies and policies replaced | *Save HH10* | Drafting error |
| 150. | Page 329, Appendix D: Saved Policies and policies replaced | *Save H18* | Drafting error |
| 151. | Pages 334, 335 and 336, Appendix D: Saved Policies and policies replaced | *Remove policies H16, 19, 20, 21 and E18 from list of saved policies* | To provide consistent policy approach across Wiltshire. |
| | **Appendix E - List of settlement boundaries retained** | | |
| 152. | Page 345, Appendix E: List of settlement boundaries retained | *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.* | Will simplify the use of the plan. |
| 153. | Page 345, Appendix E: List of settlement boundaries retained | *Add 'Durrington', 'Bulford' and 'Marlborough' to list of settlement boundaries retained.* | Drafting error. |

**Other minor changes**

| Ref' | Ref' | Change |
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| 154. | Page 17, Para 3.6, Bullet point 5 | *Change paragraph to read:*<br><br>'Land will have been used efficiently and for all developments to be low-carbon or zerocarbon will have been ~~maximised~~ optimised.' |
| 155. | Page 18, Para 3.7, Bullet point 1 | *Amend to read:*<br><br>End of first line reads 'lans' replace with 'plans' |
| 156. | Page 27, Para 4.23 | *Amend to read:*<br><br>Remove the word 'be' from the last sentence. |
| 157. | Page 30, Core Policy 2 | *Change:*<br><br>'within the Proposals Map' to 'on the Proposals Map' |

| 158. | Page 65, Para. 5.59, Bullet points 2 and 3 | Amend bullet point 2 to reflect the fact that 'Corsham Media Park' is now called '<u>Spring Park</u>'.<br><br>Amend bullet point 3 to state '<u>MOD</u>' and not 'MD'. |
|---|---|---|
| 159. | Page 68, Core Policy 11 | *Change text to read:*<br><br>'There will be no strategic housing or employment allocations <u>at</u> ~~in~~ Corsham.' |
| 160. | Page 121, Para. 5.137, Bullet point 3 | *Amend bullet point 3 to read:*<br><br>'the use of brownfield land ~~will~~ <u>may</u> also enable the protection of sensitive areas...' |
| 161. | Page 142, Warminster Area Strategy | *Under 'Issues and considerations', paragraph 5.155:*<br><br>*Amend second sentence of bullet 1 to read:*<br><br>'…These may include expansion <u>or alterations</u> of the fire station and ambulance service centre, which are either at capacity or in need of major refurbishment…' |
| 162. | Page 155, Wilton Area Strategy | *Under 'Issues and considerations', paragraph 5.171:*<br><br>Amend bullet 6 to replace 'Perscombe Down' with '<u>Prescombe Down</u>'. |
| 163. | Page 195, Para 6.76 | *Amend third sentence of paragraph to read:*<br><br>'However Core Policy ~~40~~ <u>51</u> also addresses development outside these areas which could affect the setting of these highly valued landscapes. |
| 164. | Page 206, Core Policy 57 | *Under 'Ensuring high quality design and place shaping':*<br><br>Amend first paragraph to replace 'complimentary' with '<u>complementary</u>':<br><br>Amend (ii) to replace 'exiting' with '<u>existing</u>'.<br><br>Amend (ii) to replace 'landscaping' with '<u>landscape</u>'. |
| 165. | Page 226, Para 6.178 | In paragraph 6.178 (second sentence), replace the word 'preclude' with '<u>prejudice</u>'. |
| 166. | Page 272, Land at Station Road, Westbury development template | *Under 'Key Objectives' amend bullet 4 to read:*<br><br>'To minimise the realignment of the lake in securing a link road connecting Station Road and ~~Main~~ Mane Way, and make alternative suitable provision for the sailing club if required.' |
| 167. | Pages 276 to 309, South Wiltshire development templates (general) | Replace references to policy numbers within the South Wiltshire Core Strategy with references to the relevant policy numbers within the Wiltshire Core Strategy. |

**REVIEW OF KEY OUTSTANDING ISSUES RAISED THROUGH CONSULTATION ON 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. The report begins with an overview of the 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 provide a more detailed overview for each section of the Wiltshire Core Strategy Pre-submission Document. The report only focuses on the key issues raised for each part of the plan: it is not a complete list of all issues. A more detailed summary of issues raised is available in the completed consultation 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. A list of all the changes proposed by officers is available in Appendix 1 to the Cabinet 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 polices 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 a summary comment to help explain 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 clarify 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. *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.*

2.4.1. 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:

  o Designation perpetuating artificially imposed policy by the Regional Spatial Strategy, in direct contradiction to Chippenham residents' expressed desire.
  o Chippenham has been, and still is a "Market Town". Its saving grace is its beautiful, rural aspect which improves the quality of life.
  o 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. 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.*

2.4.2.  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. This is recognised in the Council's Local Development Scheme.*

2.4.3.  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, 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.*

2.4.4. 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

2.5.1. 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.*

2.5.2. 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. *The housing requirement based on objectively assessed evidence is higher than the previous Structure Plan and plans for a significant level of housing. Significant strategic housing allocations are proposed within the plan that will boost supply.*
- 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. Approach to housing supply in Wiltshire tested through the South Wiltshire Core Strategy examination and was found ot be sound. It is therefore up to date evidence.*

- 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 consistent with the overall Strategy of the plan 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.*

2.5.3. 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.*

2.5.4. 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.*

2.5.5. 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.*

2.5.6. Brownfield development

- It was argued that brownfield development outside of the settlement framework should be supported. *The plan supports the development of brownfield sites in sustainable locations  and includes a specific policy in relation to MoD sites, which are generally outside settlement frameworks..*
- 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. *The target set in the plan is considered to be reasonable and supported by evidence in the SHLAA. No additional evidence was provided to support increasing this target.*

### 2.5.7. 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

### 2.6.1. 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.*

### 2.6.2. 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.*

### 2.6.3. 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.*

2.6.4.  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

2.7.1.  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 the 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 Appendix 1 to report CM09395.*

2.7.2.  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.*

2.7.3.  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 at this time. It is appropriate for this matter to be considered through the emerging Neighbourhood Planning process or other planning mechanism. A proposed review of the core strategy will consider the need to allocate specific sites for retail development.*

2.7.4.  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:

- o  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.
- o  Monkton Park Residents Group suggested that Rawlings Green be removed and replaced with Hunters Moon.
- o  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.*

### 2.7.5. 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.*

### 2.7.6. 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.*

### 2.7.7. 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.*

2.7.8. 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.*

2.7.9. 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.*

2.7.10. 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.*

### 2.7.11. 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.*

### 2.7.12. 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 at this time. It is appropriate for this matter to be considered through the emerging Neighbourhood Planning process or other planning mechanism. A proposed review of the core strategy will consider the need to allocate specific sites for retail development*
- 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.*

### 2.7.13. 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*

### 2.7.14. 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.*

### 2.7.15. 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..*

### 2.7.16. 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.*

### 2.7.17. 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 but there are insufficient opportunities to provide the housing necessary to support Trowbridge over the pan period when other town centre uses are considered. It is, therefore,  necessary to consider both brownfield and Greenfield sites to meet the housing requirement and to allow flexibility on town centre sites 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 at this time It is appropriate for this matter to be considered through the emerging Neighbourhood Planning process or other planning mechanism. A proposed review of the core strategy will consider the need to allocate specific sites for retail development.*

2.7.18. 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.*

2.7.19. 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.*

2.7.20. Wilton

- *No significant issues were raised.*

2.8. Delivering the strategic objectives: SO1: Delivering a thriving economy

2.8.1. 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.*

2.8.2. Core policy 35: Existing employment sites

- A number of individuals and local organisations though 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.*

2.8.3. 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. The plan supports the development of brownfield sites in sustainable locations and includes a specific policy in relation to MoD sites.*

2.8.4. 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.*

2.8.5. 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.*

2.8.6. 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.*

2.8.7. 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.*

2.9.    Delivering the strategic objectives: SO2: To address climate change

2.9.1.  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.*

2.9.2.  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. T*here 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.*

2.10.   Delivering the strategic objectives: SO3: To provide everyone with access to a decent, affordable home

2.10.1. 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:

  o Lack of developer involvement and no true examples.
  o Strategy needs to take account of individual site costs, the availability of public subsidy, S.106 requirements and other scheme costs.
  o 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.*

2.10.2. 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.*

2.10.3. 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 Strategic Housing Market Assessment.*

2.10.4. 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.*

2.10.5. 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 in response to these comments.*

2.11. Delivering the strategic objectives: 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.*

2.11.1. 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.*

2.11.2. 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.*

2.12. Delivering strategic objectives: 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 supports a move towards fewer planning documents.*

2.12.1. 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.*

2.12.2. Core policy 51: Landscape

- Natural England raised a strong concern that the council has not demonstrated that is 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.*

2.12.3. 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.*

2.12.4. 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 now proposed as part of a review of the core strategy in the LDS .*
- 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 faculties, but will work with local communities and developers to identify alternatives. CP49 protects rural community facilities and services where necessary.*

2.12.5. Core policy 54: Cotswold Water Park

- No significant issues were raised in relation to CP54.

2.12.6. 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. Supplementary guidance on the implementation of core policy 55 is also being prepared.*

2.12.7. Core policy 56: Contaminated land

- No significant issues were raised in relation to CP56.

2.12.8. 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.*

2.12.9. 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.*

2.12.10. 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.

2.13. Delivering strategic objectives: SO6: To ensure that essential infrastructure is in place to support our communities

2.13.1. Core policy 60: Sustainable transport

- Purton waste site is not most efficient or sustainable for transport and doesn't accord with overall stated policy. *This site has been subject to the councils waste site selection and site appraisal process (including SA/SEA) since 2005 and has subsequently been included as a site allocation in the Wiltshire and Swindon Waste Site Allocations Local Plan which was submitted to the Secretary of State on 14 February 2012.*
- Policies 60 & 66 both make reference to a Local Transport Plan large parts of which have still not been delivered. *The Wiltshire Local Transport Plan (LTP) 2011-2026 Strategy and Implementation Plan documents required by the Local Transport Act 2008 were adopted by the council in February 2011 along with four optional supplementary LTP documents. A number of other supplementary LTP documents are due to be developed in 2012/13.*
- There was concern that the LTP is not complete and a number of strategies are outstanding. *The Wiltshire Local Transport Plan (LTP) 2011-2026 Strategy and Implementation Plan documents required by the Local Transport Act 2008 were adopted by the council in February 2011 along with four optional supplementary LTP documents. A number of other supplementary LTP documents are due to be developed in 2012/13.*
- There was concern that improving journey time reliability is only achievable in the short term and conflicts with the sustainable transport aims. *Improving journey time reliability on key routes helps support economic growth which is a key national transport goal. The council will work to ensure that any implemented measures will have long-term benefits and will complement the wider approach to sustainable transport.*
- 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 is accepted that in terms of tourism, in order to reach more remote areas, individuals may have no other feasible option other than to travel by private car. However, where ever possible, the council will seek to encourage the use of sustainable transport alternatives.*
- 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'. *In addressing 'sustainable transport', Core Policy 60 covers all modes of transport including public transport. The Wiltshire Local Transport Plan 2011 – 2026 looked at the challenges and opportunities for all modes of transport across Wiltshire. A separate LTP Public Transport Strategy sets out the council's long term strategy and short term delivery plan for public transport.*

- It was suggested that the policy should include the re-opening of railway stations. *Core Policy 66 of the Wiltshire Core Strategy deals with the development and/or improvement of railway stations across Wiltshire.*
- There was concern that the proposals for Chippenham are contrary to bullets iii. and vi. *The council is currently developing a transport strategy for Chippenham that will ensure that the proposed development meets the requirements of Core Policy 60.*
- There was concern that the policy is more appropriate as part of a Development Management DPD. *It is considered that Core Policy 60 is a strategic policy and is therefore appropriately sited in the Core Strategy. There is currently no intention to produce a separate Development Management DPD; instead the council will undertake a partial review of the Core Strategy in order to accommodate those saved policies that exist in the current Local Plans that are in accordance with the National Planning Policy Framework.*
- 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. *The Wiltshire Core Strategy in no way seeks to address out commuting by restricting the amount of housing; rather it seeks to address the issue by encouraging settlements to be more resilient therefore reducing the need to travel.*
- 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. *As per the NPPF, the Core Strategy has been prepared in the spirit of cross border co-operation with each of our neighbouring authorities. Discussions regarding transport issues across county boundaries form an ongoing dialogue.*

2.13.2. 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. *Saved policies TR11 through to TR17 of the Salisbury District Plan will form part of a partial review of all local plan polices from across Wiltshire. The review will seek to accommodate those polices in the Wiltshire Core Strategy that comply with the National Planning Policy Framework.*
- 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. *In addition to new development, any applications for potential change of use will also be required to comply with Core Policy 61. Therefore in this instance the phrase 'new development' includes the reuse of buildings.*
- There was concern about the transport proposals at J16. *The impact of Swindon's growth on M4 Junction 16 has been the subject of extensive analysis, and a scheme for improvement of the junction is already secured by planning condition. Final detailed approval by Wiltshire Council and the Highways Agency will be required prior to implementation.*
- 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. *Core Policy 61 of the Core Strategy includes a hierarchy of transport users that favours the needs of pedestrians and cyclists above those of private cars and goods vehicles.*

- There was concern that the criteria ii. should include reference to safe access to the rail network as well as to the highway network. *The reference in Core Policy 61 of the Core Strategy to proposals being capable of being served by safe access to the highway network refers directly to road safety. As access to the rail network is generally via the highway network this is effectively also dealt with in criteria ii.*
- 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. *Core Policy 61 will require that a transport assessment demonstrates fit for purpose and safe loading/unloading facilities be provided for any new relevant development. This assessment may include offsite waiting solutions where on site facilities prove to be inadequate.*
- 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. *The use of a hierarchy will ensure that the needs of more vulnerable and sustainable modes of travel are considered before the needs of goods vehicles, powered two-wheelers and private cars.*
- 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. *Wiltshire Council is currently in the process of developing a CIL that will give greater flexibility and freedom to local authorities and communities in setting their own priorities for funding infrastructure necessary to support development. The levy also provides developers with more certainty 'up front' about how much money they are expected to contribute and ensures greater transparency for local people in understanding how new development is contributing to their community.*
- 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).*An on-street parking hierarchy forms part of the Local Transport Plan Car Parking Strategy referred to in paragraph 6.160 of the Core Strategy.*

2.13.3. 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 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. Wiltshire Council are currently developing a Community Infrastructure Levy that seeks to contribute towards the "funding gap" between the total cost of infrastructure necessary to deliver new development and the amount of funding from other sources. CIL can be spent on a wide range of infrastructure in order to support development whilst giving greater flexibility and freedom to local authorities and communities in setting their own priorities for funding infrastructure necessary to support development.*

2.13.4. 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. The decision to focus spending on integrated transport measures in the principal towns has been taken in line with the overall delivery strategy of the Core Strategy as this provides the greatest opportunities within Wiltshire to deliver improved self containment and potential to generate job growth. Having said this, the policy states that "Transport strategies may also be developed for other urban and rural areas in the Plan area". Rail transport is included in the proposed enhancements to public transport services and facilities as per bullet point ii of Core Policy 63.*

2.13.5. Core policy 64: Demand management

- Standards should reflect needs of rural areas with poor public transport.
- 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. Core Policy 64 of the Core Strategy supports and is consistent with the objectives of the Wiltshire Local Transport Plan Car Parking Strategy.*

2.13.6. 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. Bullet point i of Core Policy 65 seeks to encourage the use of rail or water for freight movements, especially for those developments that generate large volumes of freight traffic.*

2.13.7. Core policy 66: Strategic transport network

- It was suggested that the options evaluated in SA are poor quality. *The options evaluated in the SA have been part of an iterative process and follow on from a first draft of the Sustainability Appraisal Report, published in October 2009, which accompanied the document 'Wiltshire 2026', and an Interim Sustainability Appraisal Report which accompanied the second iteration of the Core Strategy, published in June 2011.*
- There was concern that improving journey time reliability is only achievable in the short term and conflicts with the sustainable transport aims. *Improving journey time reliability on key routes helps support economic growth which is a key national transport goal. The council will work to ensure that any implemented measures will*

*have long-term benefits and will complement the wider approach to sustainable transport.*

- 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. *As per the NPPF, the Core Strategy has been prepared in the spirit of cross border co-operation with each of our neighbouring authorities. Discussions regarding transport issues across county boundaries form an ongoing dialogue.*
- 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 Transwilts line is included in the rail network. The Council will work with a variety of agencies, including relevant cross-boundary organisations, to develop and improve the strategic transport network.*
- The inclusion of Corsham railway station is welcomed. *Noted.*
- 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. *The need for a railway station at Royal Wootton Bassett has been identified in Core Policy 66 under bullet point c.*
- It was suggested that more detail about J16 proposals should be in policy. Unhappy at pressure being exerted by Swindon from development and design. *The impact of Swindon's growth on M4 Junction 16 has been the subject of extensive analysis, and a scheme for improvement of the junction is already secured by planning condition. Final detailed approval by Wiltshire Council and the Highways Agency will be required prior to implementation.*
- The policy is more appropriate as part of a Development Management DPD. *It is considered that Core Policy 66 is a strategic policy and is therefore appropriately sited in the Core Strategy. There is currently no intention to produce a separate Development Management DPD, instead the council will undertake a partial review of the Core Strategy in order to accommodate those saved policies that exist in the Local Plan that are in accordance with the National Planning Policy Framework.*
- 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. *Core Policy 66 doesn't make specific references to individual developments and access arrangements on the A350; rather it ensures that the strategic transport network along the A350 corridor as a whole will be maintained, managed and selectively improved.*
- 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 accompanying text in Core Policy 66 clearly states that development "and/or" improvements will be promoted and encouraged at the 3 stations listed; obviously, how this policy is applied depends on the individual station circumstances.*

2.13.8. 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.*

2.13.9. 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.*

2.13.10. 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.*

2.14.  Appendices

2.14.1. 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:

  o **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.*

- o **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.*
- o **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.*
- o **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.*

2.14.2. 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.*

2.14.3. 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 to Appendix C, and additional detail will be added where this is considered appropriate.*

2.14.4. 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.*

2.14.5. 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.*

2.14.6. 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.*

2.14.7. 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.*

**REVIEW OF WILTSHIRE LOCAL DEVELOPMENT SCHEME 2011**

**1.      Introduction**

1.1      The Wiltshire Local Development Scheme 2011 (LDS) was approved by the Cabinet of Wiltshire Council on 15th November 2011.  It contained timetables for the completion of the:
  - South Wiltshire Core Strategy Development Plan Document (DPD)
  - Wiltshire Core Strategy DPD
  - Wiltshire and Swindon Waste Site Allocations DPD
  - Wiltshire and Swindon Minerals Site Allocations DPD
  - Gypsy and Travellers Site Allocations DPD

1.2      The LDS also anticipated the need for a Wiltshire Site Allocations DPD (to identify new sites for housing) and a Development Management DPD (to provide additional detailed policies to manage development).  The Wiltshire Site Allocations DPD would be brought forward if neighbourhood plans were not forthcoming in those market towns and local service centres with no strategic allocation in the Wiltshire Core Strategy. The need for the site allocations document would be determined through the Council's Annual Monitoring Report and its assessment of housing land supply. This element of the LDS remains relevant.  The need for the Development Management DPD was largely dependent on the publication of the National Planning Policy Framework (NPPF) (paragraph 2.6, LDS 2011) and the need to review outstanding saved policies within the former district Local Plans.

**2.      National Planning Policy Framework**

2.1      A programme for the production of the Development Management DPD was not included in the LDS because at that time it was not clear how much change to the planning system would be introduced by the NPPF, which would replace planning the Government's planning policy guidance notes and planning policy statements.

2.2      As part of the process of preparing to submit the Wiltshire Core Strategy to the Secretary of State, Wiltshire Council has carried out an assessment of the compatibility of the Wiltshire Core Strategy Pre-submission Document (February 2012) with the NPPF.  The PAS 'Compatibility Self Assessment Toolkit' formed part of the process.[1]  The assessment has concluded that there are no significant differences between the objectives of national policy and the Wiltshire Core Strategy Pre-Submission Document (draft Core Strategy), with the draft Core Strategy being generally consistent.

Level of detail in the core strategy

2.3      The Wiltshire Core Strategy was prepared on the basis that it should be a strategic document and therefore some detailed 'saved' policies were not carried forward from existing former district local plans and would instead be considered through a Development Management DPD.  A review of the NPPF suggests that in some areas a greater level of detail than currently included in the draft Core Strategy may now be

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[1] Report on Wiltshire Core Strategy's compatibility with the NPPF to be included as part of the documents supporting the Wiltshire Core Strategy to be Submitted to the Secretary of State for Examination (to be finalised and included as part of Council papers for 26 June 2012).

needed in some specific areas.  Some of these issues have been addressed through minor proposed changes to policies and text in the draft Core Strategy, for example, adding an affordable housing trajectory, referring to Nature Improvement Areas and introducing flexibility to the change of use of principal employment areas.  Other issues such as local greenspace designations and retention of local markets could be addressed through neighbourhood plans. There remain one or two issues that are not included as policies in the draft Core Strategy. In particular the need to plan positively for all town centres including definition of primary and secondary shopping frontages and, if required, specific additional sites for new development.

<u>'Saved' Local Plan policies</u>

2.4     A further area of policy raised by the review of the NPPF is the status to be given to the 'saved' adopted former district local plan policies (listed at Appendix D of the draft Core Strategy).  Annex 1 of the NPPF suggests that while these policies can be given due weight from publication of the NPPF their relevance will depend on consistency with the NPPF.  An early review of all these policies, used regularly when assessing planning applications, should be undertaken and would also introduce consistency across the Council area in relation to development management policies. The review of saved policies would also help identify where policy detail has been lost by the removal of the more detailed former Government planning policy. For example, detailed guidance on assessing the need for agricultural dwellings has not been carried forward into the NPPF but was previously included in PPS7. There may be other issues like this that arise from the review of saved policies and their consistency with the NPPF.

## 3.     Partial review of the Wiltshire LDS

3.1     The original proposal in the approved LDS was to have a separate Development Management DPD but as direction now is for fewer separate DPDs (paragraph 153, NPPF) it is proposed that the LDS includes a timetable for a partial review of the Wiltshire Core Strategy to commence on receipt of the Inspectors report. Preliminary work can commence ahead of this. The review would not reopen the debate about strategic sites, overall housing supply or other policies found sound by the Inspector. The purpose of the review would be:

- to review and update, where necessary, saved 2011 Local Plan policies not replaced by the Wiltshire Core Strategy to ensure they are consistent with the NPPF, remain relevant to the local area and make them part of the Wiltshire core strategy; and
- to bring forward locally distinctive policies, generally relating to matters of detail previously considered inappropriate in the core strategy, that have been identified through the review of the NPPF

3.2     The outcome of the review would essentially be an addendum to the core strategy in relation to locally specific, detailed development management policies. All saved policies will have either been replaced or deleted.

## 4.     Other matters

4.1     The proposed changes to the draft Core Strategy include reference to development on land to the west of Swindon within Wiltshire.  The emerging Wiltshire and Swindon Core Strategies do not support the allocation of land for housing in this location.

Preparation of the Swindon Core Strategy is not as advanced as the Wiltshire Core Strategy. As co-operating authorities, if necessary should emerging policy for Swindon change and new evidence demonstrating a requirement for sites to be planned for on land to the west of Swindon within Wiltshire emerges, both Council's can work together to prepare a joint site allocations DPD for this part of Wiltshire.

4.2     The Wiltshire LDS 2011 includes a programme for the completion of a Community Infrastructure Levy for Wiltshire.  Since November 2011 further work has been undertaken to refine the programme for the production of a Community Infrastructure Levy for Wiltshire.  This partial review of the LDS provides the opportunity to update the 2011 programme to more accurately reflect the latest timescales.  These amendments do not change the adoption date of July 2013.


**5.      Proposed changes to the Wiltshire LDS 2011**

5.1     Annex 1 outlines the changes proposed to the Wiltshire LDS 2011: to accommodate a partial review of the Wiltshire Core Strategy to review and update, as appropriate, saved local plan policies and respond fully to the NPPF; recognise, if required, the potential need to plan jointly for land to the west of Swindon; and to include a more up-to-date programme for the introduction of the Community Infrastructure Levy for Wiltshire.

**Annex 1: Proposed changes to Wiltshire LDS 2011**

| Para in LDS 2011 | Proposed change |
|---|---|
| 1.4 | Update to reflect adoption of South Wiltshire Core Strategy |
| The South Wiltshire Core Strategy relating to the former Salisbury district area ~~is well advanced (Inspector's report produced) and its completion~~ was adopted February 2012. This ~~will~~ enabled new housing sites to be identified before the Wiltshire Core Strategy is in place and a five year housing land supply to be maintained in this part of Wiltshire. The policies and proposals within the South Wiltshire Core Strategy ~~will be~~ are being subsumed into the Wiltshire Core Strategy. The South Wiltshire Core Strategy will be replaced by the Wiltshire Core Strategy when it is adopted. | |
| 1.8 | Update to reflect publication of the national planning framework and the Localism Act |
| The Localism Act 2011 introduces the powers to ~~Bill (due to be enacted spring 2012) will~~ revoke regional spatial strategies and introduce neighbourhood plans, neighbourhood development orders and the community right to build. The Government has also ~~consulted on a draft~~ published a National Planning Policy Framework (NPPF), which ~~may have~~ has implications for the content of the LDS ~~once approved~~. | |
| Table 1 | Add reference to the adopted South Wiltshire Core Strategy |
| Document:     South Wiltshire Core Strategy DPD (adopted February 2012)<br>Area covered: Former Salisbury District Council area<br>Status:     Current policy. Sets out the spatial vision, objectives and strategy for the spatial development of the former Salisbury District area and strategic policies to deliver the vision, including strategic land allocations. | |
| Table 2 | Delete row 2 in relation to the South Wiltshire Core Strategy DPD |
| Table 2 | Add an additional row in relation to the partial review of the Wiltshire Core Strategy DPD |
| Document:     Wiltshire Core Strategy DPD (partial review)<br>Area covered: Wiltshire Council Area<br>Anticipated adoption date:  December 2015 (to be in conformity with national planning policies)<br>Comments:     Sets out additional generic locally distinctive policies to assist in the determination of planning applications. | |
| 2.6 | Amend first bullet point to be more specific |
| Wiltshire Site Allocations DPD - the Wiltshire Core Strategy provides the context for the scale of growth in each community area but is not specific in every community about the location of growth. In market towns where no strategic allocation has been identified and in local service centres ~~these community areas~~, the Core Strategy allows for sites to be identified through neighbourhood plans in line with the provisions of the Localism Act 2011 ~~Bill~~. However, where neighbourhood plans are not forthcoming and if the Annual Monitoring Report prepared by Wiltshire Council indicates that there could be issues in maintaining a five year ~~the~~ supply of land for housing ~~is begins to decline~~ there may be a case for Wiltshire Council to step in and produce a Wiltshire Site Allocations DPD. | |
| 2.6 | Delete second bullet point and replace with |
| Joint Site Allocations DPD for land west of Swindon - The Wiltshire Core Strategy is being prepared ahead of the Swindon Core Strategy.  Both Core Strategies do not support the | |

allocation of land for housing on land to the west of Swindon within Wiltshire. As co-operating authorities, if necessary, should emerging policy for Swindon change and new evidence demonstrating a requirement for sites to be planned for on land to the west of Swindon within Wiltshire emerges, both Council's can work together to prepare a joint site allocations DPD for this part of Wiltshire.

| 2.10 | Delete paragraph 2.10 |
|---|---|
| Chart 1 | Remove programme for the South Wiltshire Core Strategy, which is now adopted.<br><br>Add new programme for the partial review of the Wiltshire Core Strategy.<br><br>Amend programme for the Community Infrastructure Levy to align with programme agreed with recently appointed consultants. |
| App B | Remove local development document profile for South Wiltshire Core Strategy |
| App B | Amend other document profile for the community infrastructure levy (see below) |
| App B | Add local development document profile for partial review of Wiltshire Core Strategy (see below) |

| Community Infrastructure Levy Timetable | |
|---|---|
| Stage | Dates |
| Pre-production and evidence gathering/initial consultation | ~~Nov 2011–May~~ March - August 2012 |
| Initial consultation | ~~Apr–May 2012~~ October-November 2012 |
| Preparation, evidence gathering and responding to comments | ~~June – September 2012~~ November-December 2012 |
| ~~Pre-submission consultation~~ Draft charging schedule consultation | ~~October–November 2012~~ January-February 2013 |
| Processing of representations | ~~December 2012 –January 2013~~ February - March 2013 |
| Submission to Secretary of State | ~~February 2013~~ March 2013 |
| Examination (including hearing and receipt of Inspectors report) | ~~February~~ April - June 2013 |
| Adoption | July 2013 |

| Wiltshire Core Strategy (partial review) (2006-2026) | |
|---|---|
| Role and subject | The purpose of the partial review of the Wiltshire Core Strategy will be to introduce further detailed development management policies to the adopted Wiltshire Core Strategy.  It will involve a review and update of the saved 2011 local plan development management policies not replaced by the Wiltshire Core Strategy and developing additional locally distinctive policies to guide development within Wiltshire consistent with national policy.  A key area of new policy will be to plan positively for all town centres in Wiltshire.<br><br>All policies will be drafted to become part of the Wiltshire Core Strategy. It is not the purpose of the review to re-open discussion about other parts of the plan and will effectively be an addendum to the adopted core strategy. |
| Geographical coverage | Wiltshire |
| Document typ[e/status | Development plan document |
| Chain of conformity | National policy |
| **Timetable** | |

| Stage | Dates |
|---|---|
| Pre-production/community engagement/informal consultation | January  - May 2013 |
| Preparation, further evidence gathering and responding to comments | June - October 2013 |
| Pre-submission consultation | November - December 2013 |
| Processing of representations | January  - March 2014 |
| Submission to Secretary of State | April 2014 |
| Examination (including hearing and receipt of Inspectors report) | May - October 2014 |
| Adoption | December 2014 |
| **Production and participation** | |
| Lead service | Economy and regeneration |
| Other key services | Sustainable Transport; Housing; Development Services; Regulatory Services; Community Safety; Amenities and Leisure; Major Projects; Adult Care: Strategy & Commissioning; Community Leadership & Support; Libraries Heritage & Arts; Schools; Children & Families, Resources, Improvements & Young People; Legal & Democratic Services and Performance & Risk |
| External stakeholders | Infrastructure providers; central and local government agencies; adjoining local authorities; parish and town councils; developers; agents and key landowners; business support organisations; housing bodies; MoD; relevant national interest groups; relevant local interest groups; relevant charities; general public and residents associations and other groups within our community. |
| Political oversight | Cabinet of Wiltshire Council |

**Wiltshire Council**

**Cabinet**

**19 June 2012**

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| | |
|---|---|
| **Subject:** | **Aggregate Minerals Site Allocations Development Plan Document (DPD) –Submission to Secretary of State** |
| **Cabinet Member:** | **Councillor Fleur de Rhé-Philipe**<br>**Economic Development and Strategic Planning** |
| **Key Decision:** | **Yes** |

**Executive Summary**

Since the adoption of the Minerals Core Strategy and Minerals Development Control Policies Development Plan Documents (DPD) in 2009, considerable progress has been made on the preparation of the Aggregate Minerals Site Allocations DPD (the Sites DPD). Despite the changes in the planning system, it is clear that the Government remains committed to a managed aggregates supply system premised upon long-term forecasting.

The capacity of Wiltshire and Swindon to meet the Government's proposed forecast provision rate of 1.41 million tonnes per annum has been fully assessed through the preparation of the Sites DPD. Evidence underpinning the DPD has demonstrated that a lower, locally derived forecast rate of 1.2 million tonnes per annum should be applied.

Following further work and consultation, the Sites DPD can now be submitted to the Secretary of State for Examination. This report sets out:

- A summary of the plan preparation process to date;
- The key issues that have emerged through the recent consultation undertaken between January and March 2012;
- The arrangements for submitting the Sites DPD; and
- Next steps.

Following approval from Council, the Sites DPD, along with all other supporting documents, will be formally submitted to the Secretary of State (for Communities and Local Government) in order to initiate the Examination process by an independent Planning Inspector.

The Examination will consider matters of soundness.  At the end of the process, the Inspector will issue the Councils with a report on the outcome of the Examination process. Should this report recommend that the Sites DPD is sound; arrangements will be made for formal adoption. This is scheduled for early 2013.

CM09393/F

**Proposals**

**That Cabinet:**

(i) endorses the Submission draft Aggregate Minerals Site Allocations DPD and proposed minor modifications set out at Appendix 3, and recommends that Council approves these for the purpose of submission to the Secretary of State and

(ii) delegates to the Director for Economy and Regeneration, in consultation with the Cabinet Member for Economic Development and Strategic Planning, authorisation to propose other minor modifications to the Sites DPD for submission to the Secretary of State in the interests of clarity and accuracy, and to make appropriate arrangements for submission of the documents to the Secretary of State and any consequential actions as directed by the Inspector relating to the Examination.

**Reason for Proposals**

To ensure that progress continues to be made on preparing an up-to-date minerals policy framework for Wiltshire (and Swindon) in line with the timetable set out in the Council's revised Local Development Scheme and statutory requirements. Once adopted, the Sites DPD will form part of the Council's policy framework.

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

**Wiltshire Council**

**Cabinet**

**19 June 2012**

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Subject:         **Aggregate Minerals Site Allocations Development Plan Document (DPD) - Submission to Secretary of State**

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

Key Decision:      **Yes**

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**Purpose of Report**

1.      The purpose of this report is to request that Cabinet:

     (i)      endorses the Submission draft Aggregate Minerals Site Allocations DPD (the Sites DPD) together with proposed minor modifications set out in **Appendix 3** and recommends that Full Council approves these for the purpose of submission to the Secretary of State for Examination and

     (ii)      delegates to the Director for Economy and Regeneration, in consultation with the Cabinet Member for Economic Development and Strategic Planning, authorisation to propose other minor modifications to the Sites DPD for Submission in the interests of clarity and accuracy and to make appropriate arrangements for submission of the documents to the Secretary of State and any consequential actions as directed by the Inspector relating to the Examination.

**Background**

2.      Since the adoption of the Minerals Core Strategy and Minerals Development Control Policies DPDs in 2009, considerable progress has been made on the preparation of the Sites DPD. Despite the changes in the planning system, including publication of the National Planning Policy Framework (NPPF), it is clear that the Government remains committed to a managed aggregates supply system premised upon long-term forecasting.

3.      Cabinet has met to discuss the progress of the Sites DPD at various stages during the plan preparation process. The dates of these meetings, and the decisions made at each, are listed in the table below.

| Cabinet Date | Decision resolved |
|---|---|
| 27 July 2010 | Recognised the need to identify sites for sand and gravel extraction in order to address long-term supply issues and the short-term shortfall in permitted reserves (the landbank) and approved that public consultation is undertaken on initial site options.<br><br>Resolved that Wiltshire Councillors should be advised of any potential sites identified within their respective division and that town and parish councils should be similarly kept informed. |
| 22 March 2011 | The Interim report on the consultation undertaken on the proposed minerals sites (between 5 August 2010 and 31 October 2010) was considered. It was resolved that the initial 62 site options be reduced to 22 sites and subjected to further detailed assessments to inform their suitability for allocation, and targeted consultation be undertaken on one additional site.<br><br>In addition, a local figure for aggregate provision in Wiltshire and Swindon would be produced on the basis of these further assessments. Subsequent assessments clearly showed that Wiltshire and Swindon cannot make provision for the sub-regional apportionment figure of 1.85 million tonnes per annum as set out in the draft Regional Spatial Strategy for the South West. |
| 14 June 2011 | Resolved that:<br><br>(i) A local forecast rate of 1.2 million tonnes per annum (decreased from current 1.85 million tonnes per annum figure) is used as the basis for making provision in the Sites DPD; and<br><br>(ii) Eight[1] sites would be carried forward into the Sites DPD.<br><br>Following this meeting, the Director for Economy and Enterprise wrote to central Government notifying them of the provision that can be met for the period to 2026. This sets out clear reasons as to why a forecast rate of 1.2 million tonnes per annum is appropriate for Wiltshire and Swindon. |
| 7 December 2011 | Approved the pre-submission draft Sites DPD for a final stage of consultation relating to the soundness of the document. This took place between 30 January and 12 March 2012[2]. |

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[1] Note the number of sites carried forward into the DPD was altered to 7 with extensions to Brickworth considered as one site option due to their shared characteristics and shared restoration potential
[2] The consultation was extended by 5 days in the Borough of Swindon as an advert was not placed in the Swindon Evening Advertiser on the day of the consultation commenced, appearing instead on the 26 January 2012 - prior to the start of consultation. An advert was subsequently re-placed in the Swindon Evening Advertiser on the 3 February 2012. Furthermore, due to a database error 513 consultees were informed of the consultation 2 weeks late. The consultation was extended by an additional 2 weeks for those consultees.

CM09393/F

**Main Considerations for the Council**

4.      The recent consultation undertaken between January and March 2012 was a formal stage of the process whereby respondents were invited to comment on matters of soundness[3]. The consultation generated 124 comments from 53 organisations, consultees and members of the public. These comments will be considered by a Government appointed Inspector and form the basis of the forthcoming Examination.

5.      A breakdown of the key points raised through the formal consultation stage, which will inform matters for consideration and discussion at Examination can be found at **Appendix 2**. A schedule of proposed minor modifications to the Sites DPD arising from consultation comments is presented at **Appendix 3**. Verbatim comments received, and a detailed report[4] outlining all consultation work, will be submitted as part of the Councils' submission to the Secretary of State. Copies of this report will be made available for viewing in the **Members' Room** and on the website.

6.      The Sites DPD has been prepared in light of the resolutions of Cabinet in 2011 and is attached at **Appendix 1**. This is considered to be a sound document that is based on robust and proportionate evidence gathering and consultation. In order to finalise the plan preparation process it should now be submitted to the Secretary of State for Examination. The documents to be submitted alongside the Sites DPD for Examination are set out in paragraph 7 below.

7.      The evidence base to be submitted comprises:

(i)     Initial site appraisal matrices completed by officers to highlight the issues for each potential site.
(ii)    Mineral Resource Zone site identification sieving report.
(iii)   Detailed Assessments undertaken by Wiltshire Council on Landscape and Visual Impact; Transport; Archaeology; and the Historic Built Environment.
(iv)    An Ecological Assessment Report (incorporating Habitat Regulations Assessment requirements, as required by European legislation) undertaken by the Council's Ecologist.
(v)     Noise and Air Quality assessments and hydrogeological impact assessments undertaken by external consultants.
(vi)    Consultation output report (detailing the consultation and evidence gathering work undertaken to date) – Regulation 30(1)d and 30(1)e[5] (Regulation 22(1)(c)).
(vii)   A Sustainability Appraisal Report.
(viii)  Schedule of proposed modifications to the Sites DPD.
(ix)    Soundness Self Assessment.
(x)     National Planning Policy Framework checklist.

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[3] Government policy, as set out through the National Planning Policy Framework (NPPF) states that to be sound a DPD should be positively prepared, justified, effective and consistent with national policy.
[4] 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).
[5] In accordance with the Town and Country Planning (Local Planning)(England) Regulations 2012, the requirements of Regulation 30 are now set out at Regulation 22.
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8. Whilst officers consider that no significant new issues have been raised during the consultation, comments and concerns were raised on a number of areas within the plan. Some of the general concerns/issues are discussed below, site based issues are detailed in **Appendix 2**.

9. Concerns were raised from some sections of the minerals industry that Wiltshire and Swindon are not seeking to allocate sufficient sites to fulfil long-standing and agreed aggregate provision obligations through the intention to pursue a locally derived forecast figure of 1.2 million tonnes of sand and gravel per annum. They felt that the proposed provision rate could lead to a downward spiral/reduction in the number of submitted planning applications and does not offer flexibility. However, evidence from the past 10 years of production of sand and gravel at quarries located within the plan area indicates that production has consistently fallen short of the original figure of 1.85 million tonnes per annum and the recently revised figure of 1.41 million tonnes per annum – sitting at slightly less than 1.1 million tonnes per annum. Therefore, officers are confident that a proposed locally derived forecast figure of 1.2 million tonnes per annum as detailed through the Sites DPD is justified, evidence based and flexible to changing market conditions.

10. Landowners of previously considered, but dropped, sites U15, U17 and C16 asked for the Councils to revisit these with the view of reconsidering their inclusion in the Sites DPD. The Sites DPD has been informed by a positive and inclusive approach to site identification, using a detailed methodology, as demonstrated through the consideration of all site options through previous rounds of consultation. The sites presented in the plan offer the most sustainable site options and therefore the Councils are of the view that previously considered, but removed, sites should not be included in the Sites DPD.

11. A general comment made about all sites related to the need for noise and dust assessments to address the cumulative impacts at remote roadside properties where HGV traffic would pass when transporting mineral from the proposed sites. In response to this, suitable text has been developed as a proposed modification to highlight the issue of potential impacts to roadside properties remote from the site along HGV routes associated with operations at sites in the plan.

12. Furthermore, concern was expressed that cumulative effects had not been adequately addressed for all sites. Particular reference was made to aviation safety, environmental impact, transport/HGV movement impacts and potential impacts on Gloucestershire. However, the issue of cumulative effects associated with proposed minerals development is already recognised within the Sites DPD and will therefore be considered through any subsequent planning application. Issues of potential cumulative impacts on Gloucestershire are highlighted as a key consideration through the adopted Wiltshire and Swindon Minerals Core Strategy DPD, which any planning application will also need to comply with.

13.     In light of comments and advice received during the last round of consultation some minor modifications to the Minerals Site Allocations DPD are proposed, which should be submitted to the Secretary of State alongside the Sites DPD.  In broad terms these modifications concern issues of clarity, consistency, updating the DPD in light of changes to the planning system and the NPPF, minor text changes and additional wording within some site profile tables to reflect concerns raised by consultees on issues including the water environment, traffic and transportation, human health and amenity and archaeology . These proposed modifications are not considered by officers to be substantial and can be accommodated into the DPD in order to strengthen sections where necessary, without undermining the overall soundness of the document. A full list of proposed minor modifications can be viewed at **Appendix 3**.

14.     By endorsing the Sites DPD for submission to the Secretary of State, Cabinet considers that the document is sound and that it should be presented to Council. Swindon Borough Council Cabinet will meet to discuss the Sites DPD on 30 May 2012 and, should the document be endorsed, it will be presented to Swindon Borough Council Full Council on 19 July 2012.

15.     Once submitted to the Secretary of State, the process of independent Examination by a Government appointed Planning Inspector will commence.

The National Planning Policy Framework (NPPF)

16.     Officers consider that the Sites DPD and policies included within the Minerals Core Strategy and Minerals Development Control Policies DPD's are in general conformity with the policies of the recently introduced NPPF and prepared consistent with the duty to co-operate as prescribed through the Localism Act 2011 and NPPF.

17.     The NPPF (paragraph 145) clearly stipulates that local authorities should base their provision rate on the basis of a rolling average of the past 10 years production/sales (currently 1.1 million tonnes per annum of sand and gravel for Wiltshire and Swindon) and should take the advice of an Aggregate Working Party when preparing local Aggregate Assessments. The Council has been in compliance with this approach throughout the process of site selection, the development of the Sites DPD and the approach taken to determine a locally derived apportionment figure of 1.2 million tonnes per annum.

18.     The duty to co-operate requirement only came into force through the Localism Act in November 2011; however, the Council has been working within the 'spirit' of the duty to co-operate throughout the preparation of the Minerals Development Framework and the Sites DPD. The Council has consulted extensively with all relevant bodies (as listed in regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012) throughout the preparation of the Sites DPD[6].

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[6] See 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) for details of previous rounds of consultation the Sites DPD.
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**Environmental and Climate Change Considerations**

19.     The Sites DPD has been prepared in accordance with legislative procedures and national policy[7]. In addition, the document is in general conformity with the adopted Minerals Core Strategy.

20.     In preparing and appraising the document, all reasonable site options have been considered and judged against environmental criteria through the rigorous application of Sustainability Appraisals (incorporating the requirements of the Strategic Environmental Assessment Directive) and Habitats Regulations Assessments – to be examined alongside the document. As such, the final schedule of proposed site allocations are considered to represent the most sustainable options for meeting forecast requirements for aggregate minerals.

21.     Matters in relation to the potential environmental impact of bringing forward new mineral sites have been fully considered. The document sets out clear guidelines to be considered when applications are being prepared. Such matters include, *inter alia* – pollution control measures, flood risk assessment and mitigation for landscape impact. Where necessary, appropriate changes/amendments to site profiles have been proposed to reflect information presented by consultees (e.g. The Environment Agency, English Heritage) through previous consultation work.

22.     Environmental and climate change implications have, and will continue to be, fully considered and minimised as far as is reasonable practicable at the plan level.  Detailed proposals in relation to climate change adaptation and the mitigation of social / environmental impacts will be matters for any subsequent planning application process.

**Equalities Impact of the Proposal**

23.     The Sites DPD has been prepared to ensure that impacts on the various strands of equality have been addressed. As with all DPDs, a full Equalities Impact Assessment will be included with the documents and evidence submitted to the Secretary of State to support the Examination process.

**Risk Assessment**

24.     The key risks associated with the preparation of this DPD are:

        (i)     Risks associated with procedural compliance matters, including the legal duty to co-operate – these have been addressed throughout the plan preparation process. These matters will be considered in more detail by the Inspector through the early stages of the Examination process.

        (ii)    The principal risk associated with the submission and examination stage relates to soundness. In presenting the Sites DPD to the Secretary of State, the Councils are of the opinion that the proposals it *[the document]* contains are sound. This opinion will be tested by the Inspector through

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[7] The bulk of the plan preparation process was undertaken in the light of previous national planning policy, as set out across the former Mineral Planning Statements and Planning Policy Statements.  With the publication of the National Planning Policy Framework, the Sites DPD has been screened for general conformity with new policies.
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the Examination of all submitted matters (i.e. the primary documents and all consultation materials).

(iii)     The Government may not accept the proposal to reduce the sand and gravel provision rate for Wiltshire and Swindon. Evidence submitted by the minerals industry and landowners during the consultation period has challenged the Councils' approach to site identification and proposals to progress with a local apportionment figure of 1.2 million tonnes per annum. However, in taking an evidence based approach to establishing a reasonable new rate of aggregates provision for Wiltshire and Swindon, the Councils are confident that a realistic and pragmatic approach to determining a suitable rate has been used. In addition, the approach is considered to be fully compliant with the new national policy position (NPPF, paragraph 145).

(iv)     Following Independent Examination, a legal challenge could be made on the process leading to the adoption of the Sites DPD.

## Financial Implications

25.     The cost of preparing the Sites DPD has been planned financially and the Examination costs can be met from a reserve built up for this purpose. There is potential for further financial costs at the end of the Examination process. If the document is found to be sound and subsequently adopted by the Councils, there follows a six week period of legal challenge. Such actions are rare but must be considered and costs will need to be met.

## Legal Implications

26.     The legal issues associated with the Examination process are broadly set out above.

27.     The steps undertaken to date, and those next steps proposed within this report, are considered to be fully compliant with regulatory requirements as set out in Regulations 25 and 27 of the Town and Country Planning (Development) (England) Regulations 2004 (as amended).[8]

## Options Considered

28.     The process of developing the Sites DPD has been one of considering and refining the options available based on full appraisal of the available evidence. The site options considered in the previous consultation in 2010 were fully appraised. Only those site options considered suitable in social, environmental and economic terms have been included in the Sites DPD. Those options that are considered unsuitable have been excluded. The Submission draft of the DPD therefore represents the most suitable options having considered all reasonable alternatives.

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[8] Please note that the implementation of the Localism Act, 2011 and the recently published National Planning Policy Framework (NPPF) has led to the publishing of an amended set of planning regulations – The Town and Country Planning (Local Planning) (England) Regulations 2012. The steps undertaken to date in the development of the Sites DPD and the next steps proposed are considered to be fully compliant with regulatory requirements 18, 19 and 35 as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012.

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**Conclusions**

29.     The submission of the Minerals Site Allocations DPD represents the final preparatory stage of the plan making process. The process of developing the Sites DPD has been one of considering and refining the options available based on full appraisal of the available evidence.

30.     In light of comments and advice received during the last round of consultation some minor modifications to the Minerals Site Allocations DPD are proposed, which should be submitted to the Secretary of State alongside the Sites DPD. These proposed modifications are not considered by officers to be substantial and can be accommodated into the DPD in order to strengthen sections where necessary, without undermining the overall soundness of the document.

31.     The next steps will result in duly made comments being considered by a Government appointed, independent Planning Inspector. Based upon the evidence submitted by respondents (relating to the soundness of the documents), weighed against the evidence of the Councils, the Inspector will make a decision as to whether the document is sound and hence able to be adopted.


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**The following unpublished documents have been relied on in the preparation of this Report:**

    None

**Appendices:**

    Appendix 1  - Wiltshire and Swindon Aggregate Minerals Site Allocations
                      DPD – Submission Draft (enclosed separately)
    Appendix 2  - Main issues arising from the Minerals Sites DPD consultation
    Appendix 3  - Proposed minor modifications to the Minerals Sites DPD
                      following consultation

## <u>Main issues arising from the Minerals Sites DPD consultation</u>

Following an assessment of the comments received through the pre-submission consultation process, a number of issues for discussion and further consideration were raised by consultees. It is likely that these issues will be discussed during the independent examination of the plan and a decision will be made on the merits of each issue where a change in the plan is proposed or requested.

### Wiltshire and Swindon's Sand and Gravel Apportionment figure

Concerns were raised from some sections of the minerals industry that Wiltshire and Swindon are not seeking to allocate sufficient sites to fulfil long-standing and agreed aggregate provision obligations. Of particular concern was the approach that the councils have taken regarding the implementation of a locally derived forecast figure of 1.2 million tonnes of sand and gravel per annum. A number of comments were made covering this approach and potential implications such as:

- The need to ensure an adequate and steady supply of aggregates for use within the plan area. Wiltshire must consider a more robust method of local forecasting.

- The proposed reduction in provision rates is an abrogation of responsibility and places pressure on surrounding counties who may have to make a larger provision to cover Wiltshire's shortfall.

- In-direct encouragement of mineral importation by road runs contrary to the policies set out in MPS1.

- The proposals may lead to a downward spiral of unrealistically low assumptions of the levels of mineral needed *[to serve local markets]*, leading to a reduction in the number of submitted planning applications against a backdrop of continual decline for construction minerals.

- The proposed provision rate does not offer flexibility or workable prospects for landbank maintenance for the industry, nor does it have an in-built contingency should demand increase significantly during the plan period.

- The Draft Regional Spatial Strategy (RSS) provision levels should be perpetuated (i.e. at a rate of 1.85 mtpa). The councils' revised figure for sand and gravel provision requirements might require an amendment of the adopted Minerals Core Strategy.

It was also felt that the proposals do not support the provision of adequate supplies of aggregate minerals from local quarries to support local development.

### Previously dropped sites

Landowners of previously considered, but dropped sites[1] U15, U17 and C16 asked for the councils to revisit the assessment approach; and the information used to drop these sites with the view of reconsidering their inclusion in the Minerals Sites DPD. In the case of

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[1]See 'Initial Site Options Report for the Wiltshire and Swindon Aggregate Minerals Site Allocations DPD' (August 2010) and 'A report of the results of consultation on initial site options for sand and gravel extraction' (August – October 2010).

dropped sites U15 and U17 the landowner provided evidence of survey work and investigations into the quality and depth and resource at these locations. It was argued that the generic estimates used from British Geological Survey data was unreliable and that the councils should carry out a robust review of these two dropped sites as they could be suitable options to help meet Wiltshire and Swindon's minerals apportionment figure. With regards to dropped site C16, the landowner and mineral operator put forward an argument that the site should be reconsidered and developed sensitively to provide a sustainable source of local building materials.

**Human health and amenity**

A general comment made about all sites suggested that any noise and dust assessments should address the cumulative impacts at relatively remote roadside properties where HGV traffic would pass when transporting mineral from the proposed sites. To mitigate these impacts, planning permissions for mineral workings should be conditioned to control operating hours and vehicle movements associated with the operation of sites. Furthermore, MPS2 should be the minimum standard of noise control that is applied and site specific noise considerations should be developed.

**Cumulative effects**

Concern was expressed that cumulative effects *[associated with proposed minerals development]* had not been adequately addressed for all sites. Of particular note, the MOD raised concern about the potential cumulative effects from development of sites identified in proximity to RAF Fairford on aviation safety grounds. Sites close to the Gloucestershire County boundary could have 'in-combination' environmental, amenity and supporting infrastructure effects which should be considered. The cumulative impact of increased HGV traffic was cited as being of particular concern for those sites located in the Upper Thames Valley but also at the site located on land near Compton Bassett, in part due to current HGV traffic associated with waste operations in the area and the movement of this traffic through the centre of Calne and surrounding villages. Hampshire County Council expressed concern that potential HGV traffic associated with workings at the proposed extensions to Brickworth Quarry site be restricted to only using the A36 and thereby avoid using the A27.

**Site Specific Issues**

Cox's Farm

- The MOD commented that the proposed site is situated within the explosive, height and technical safeguarding consultation zone which surrounds RAF Fairford and subsequently presented a line within the site boundary where they cannot accept mineral working (in line with requirements of explosives safeguarding).
- The MOD also commented on the need to reduce the risks associated with birdstrike, the requirement to not work within the Inhabited Building Distance (IBD[2]), that restoration should not feature wetland habitat and that all phased workings are approved by DIO[3] safeguarding.

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[2] Inhabited Building Distance (IBD) - Within this safeguarding zone the MOD monitors the management and use of developments to maintain public safety and tends to object to any persons living, working or congregating for long periods of time. Allowing mineral workings within this zone will introduce a significant risk to operations at RAF Fairford by severely reducing the licensed storage capacity at several ammunitions storage facilities located at the aerodrome.

[3] Defence Infrastructure Organisation – Manages the military estate, including accommodation for Service personnel and their families, on behalf of the MoD. The DIO was formed on 1 April 2011. The DIO should be consulted when a planning application for the site is received.

- Comments received from residents of Marston Meysey sought an increased buffer zone or designated 'Zone of Sensitivity' (over 100m) to the west of the site to protect the historic setting of the village, limit noise and dust impacts and reduce landscape impacts.
- The archaeological value of the site and surrounding areas was highlighted as being of particular importance requiring suitable mitigation in line with policy and guidance notes.
- Numerous comments were received pointing to the need for improvements to the local C class roads in the area, the introduction of a 30/40 mph speed limit and that traffic issues in the area are looked at in a co-ordinated manner.
- There were calls for more assessments to be undertaken into the impact of quarrying on water courses and water flow and questions were raised over the credibility and robustness of the evidence used by the councils whilst the Environment Agency is carrying out re-modelling work in the area.

Blackburr Farm

- The MOD expressed a preference for restoration to dry land on the site whilst the Cotswold Canal trust felt that restoration of the canal and creation of a marina in the area was of great importance to the Cotswold Canal restoration project as a whole.
- Concerns around the issues of noise, dust and disruption to village life in Castle Eaton and the nearby Second Chance Touring Park were of particular prominence. Recommendations were proposed whereby any permission at the site should include a comprehensive noise condition derived from a combination of good practice, existing guidance and the current World Health Organisation advice on the impacts of noise on health - with enforceable target noise levels.
- Due to the relatively elevated position of Castle Eaton, quarrying at this location would have a significant detrimental impact on the historical/landscape character of the area – in particular with impacts to the setting of Caste Eaton conservation area and St Marys Parish Church (Grade 1 listed).
- The archaeological value of the site and surrounding areas was highlighted, with evidence of a prehistoric/roman settlement in the vicinity requiring suitable mitigation in line with policy and guidance notes.
- It was felt that the local C-class roads in the area would require major improvements to service new quarries (similar to points raised against Cox's Farm) and the safety of the A419 was questioned.
- There were calls for more assessments to be undertaken on the potential impact of quarrying on water courses and the pattern of water flow. Questions were raised over the credibility and robustness of the evidence used by the councils whilst the Environment Agency is carrying out re-modelling work in the area.

North Farm

- Part of the site is said to be owned by one of the consultees who objects to the inclusion of the land in the Minerals Sites DPD. They were also of the opinion that the inclusion of the site was an economically unsound proposition as the site had the smallest potential yield of all sites in the DPD, with the greatest potential difficulty and associated developer costs.
- There was support for the proposed restoration objective, however the MOD would prefer the site was restored to dry land, there were also concerns that restored land will reduce landscape value.

- Concerns were raised as to the potential impact of working the site on the Thames habitat corridor and associated species and the Thames National Path.
- The issue of noise, dust and disruption to village life in Castle Eaton and the nearby Second Chance Touring Park was of particular prominence in submitted representations. Recommendations were proposed whereby any permission at the site should include a comprehensive noise condition with target noise levels.
- It was felt that due to the relatively elevated position of Castle Eaton, quarrying at this location would have a significant detrimental impact on the historical/landscape character of the area – in particular with impacts to the setting of Caste Eaton conservation area and St Mary's Parish Church (Grade 1 listed).
- There was a strong feeling amongst consultees that the infrastructure in the area is not effective to take additional HGV traffic. Again, safety issues and required road improvements were cited as significant concerns. One transport solution should be sought to address problems of the four proposed sites in the area.
- The archaeological value of the site and surrounding areas was highlighted as being of considerable importance and likely to contain more finds of equal if not greater significance requiring suitable mitigation in line with policy and guidance notes.
- Concern was raised that the land is subject to winter flooding which could increase the risk of pollutants entering the surrounding land and the River Thames.

Land east of Calcutt

- It was pointed out that the site is in close proximity to a Sewage Treatment Works and that Thames Water have operational assets crossing the site. It was suggested that the Minerals Sites DPD be amended to reflect this fact.
- Concerns were expressed that the habitat and landscape value of the River Thames will be spoilt by the erection of bunds and screening.
- The archaeological value of the site and surrounding areas was highlighted, with the site located in proximity to Ermin Way and the site of a former Roman Villa requiring suitable mitigation in line with policy and guidance notes.
- There was a strong feeling amongst consultees that the infrastructure in the area is not effective to take additional HGV traffic. Again, safety issues and required road improvements were cited as significant concerns. One transport solution should be sought to address problems of the four proposed sites in the area.
- Concern was raised that the land is subject to winter flooding which could increase the risk of pollutants entering the surrounding land and the River Thames.

Land at Cotswold Community

- There was support for the inclusion of this site, however there were conflicting views regarding how issues of access should be approached within the Minerals Sites DPD. Hills Quarry Products Ltd. (an adjacent mineral operator), felt that the site should be treated as an extension to the adjoining quarrying activity located to the north of the proposed site. However the owner of the site objected to the site being treated as an extension to the adjoining quarry to the north and instead requested that the site be treated as independent with its own access arrangements (direct to the Western Spine Road) developed.
- The archaeological value of the site and surrounding areas was highlighted, whilst English Heritage commented on the likely potential change to the context and setting of the former school/farmstead and grade 2 listed buildings. However, it was also suggested that these buildings may have already been compromised by past construction and that restoration could improve these aspects.

Land near Compton Bassett

- The proposed preferred restoration objective for the site split opinion. Natural England broadly welcomed the proposals and the potential to enhance public rights of way and cycle routes. However local residents felt that a restoration timescale was required, there was still concern that sand extraction would be followed by waste disposal (landfilling) activities. Comments were made that the inclusion of the site was to the detriment of strategic restoration and amenity proposals considered for the whole Lower Compton site.
- Concern was expressed that working of the site would impact on the well-being of Calne communities as a result of air quality impacts and associated movement of HGV traffic through the centre of Calne.
- The issue of HGV traffic and associated movements was raised by a number of consultees. It was felt that the location of the site was likely to exacerbate traffic issues in Calne whilst increases in HGV traffic along the A3102 and through Royal Wootton Bassett, Lyneham, Goatacre and Hilmarton would not be acceptable to residents in these locations. It was also highlighted that HGV routeing would have to be down Sandpit Lane where a new housing estate has recently been built and that traffic pressures would increase around Lower Compton Road and the A4 junction.
- Comments considered that the likely impact on the nearby North Wessex Downs AONB and visual impact on Morgan's Hill had not been adequately assessed and that an Environmental Impact Assessment would be required for proposed works.
- It was also considered that current workings in the area have affected underlying groundwater and aquifer dynamics and that further extraction in the area would exacerbate this issue.


Extensions to Brickworth Quarry

- A recurring issue expressed by consultees was an objection to the footprint of the site being located in an area designated as Ancient Woodland and County Wildlife Site. Comments raised suggested that the Minerals Sites DPD does not show that the need for the site outweighs the loss of woodland habitat; that Ancient Woodland (as a system) cannot be trans-located; that the loss of Ancient Woodland would run contrary to government forestry policies and that although soil structures can be maintained and preserved, areas of Ancient Woodland that are disturbed are unlikely to survive.

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**Schedule of Proposed Minor Modifications arising from the consultation on the Proposed Submission draft Aggregate Minerals Site Allocations Local Plan Consultation**

**General changes/comments on approach/comments on introduction**

| Comment reference | Summary of Submitted Representation | Modification suggested (Yes/No)/agreed | Pre-submission draft document reference | Officer response/Suggested modification if made and location within document |
|---|---|---|---|---|
| | **General comment/modifications** | | | |
| PM1 | Update copyright dates for all maps in the plan. | Yes | Figure 1.1, Area and Inset Maps. | <u>Maps and Figures</u><br>Copyright details for all maps and figures to be updated to read ***"© Crown copyright and database rights 2012 Ordnance Survey 100049050"*** |
| PM2 | Amend figure 1.1 to un-embolden the boundary of Southampton. | Yes | Figure 1.1 | <u>Figure 1.1</u><br>To be amended to remove bold outline of Southampton area in the interests of consistency. |
| PM3 | In accordance with the National Planning Policy requirements for Development Frameworks to be called Development Plans and Development Plan Documents to be re-termed Local Plans - update all references. | Yes | All relevant references | <u>All relevant references</u><br>Replace all references to Local Development Frameworks (LDFs) with ***'Development Plans'*** and all references to Development Plan Documents/DPD to ***'Local Plan(s)'***. |
| PM4 | Replace all references to the draft National Planning Policy Framework with National Planning Policy Framework | Yes | All relevant references | <u>All relevant references</u><br>Replace all references to the draft National Planning Policy Framework with '***National Planning Policy Framework'*** |
| PM5 | In accordance with the National Planning Policy delete references to MPS's and PPS's/PPG's and/or replace with NPPF where relevant. | Yes | All relevant references | <u>All relevant references</u><br>Delete references to MPS's and PPS's/PPG's and/or replace with ***'NPPF'*** where relevant. |
| | **Comments in order of Local Plan site profile** | | | |

| | **Human Health and Amenity** | | | |
|---|---|---|---|---|
| PM6 | All sites should be assessed against the MPS2 minimum standard of noise control. | Yes | The Noise section within the Human Health and Amenity criteria within each of the site profile tables. | Officers are currently in discussions with Public Protection Services regarding the position to take in light of the recently introduced National Planning Policy Framework (NPPF). |
| | **Traffic and transportation** | | | |
| PM7 | The traffic and transportation section needs to be looked at in a co-ordinated way with other plans and strategies to limit the impacts of HGV movements on the A419 through Latton and Cricklade. | Yes | The Upper Thames Valley – context section. | Context Section<br>Reflect the fact that issues of a strategic and local nature will need to be addressed through the development of minerals proposals in the Upper Thames Valley. Additional text as a new paragraph to be added beneath paragraph 2.4, to read:<br>***'The planned release of minerals sites in the Upper Thames Valley will need to ensure that all relevant strategic and local considerations (including HGV movements along the A419 and the requirements of other plans and strategies in the area) have been factored into the development of minerals proposals.'*** |
| | **The Water Environment** | | | |
| PM8 | Reference should be made in all cases to the relevant Catchment Flood Management Plan and to Wiltshire Council's Flood Risk Assessment. | Yes in part | Water environment section of all site profile tables. | Site Profiles<br>Reference should be made to the Wiltshire SFRA and to floodplain protection. However it was felt unnecessary to make reference to relevant catchment flood management plans. Suggested change in all water environment sections to read ***'With reference to the Wiltshire SFRA,*** *the site is....A Flood Risk Assessment should be submitted with any subsequent planning application* ***with proposals to protect the floodplain where necessary.'*** |
| PM9 | Add text to detail the relevant vulnerability of aquifers for each site. | Yes | Water environment section of all site profile tables. | Through discussion with the Environment Agency and following the Agency's advice. Add text into the water environment section of all site profile tables detailing the vulnerability of aquifers in relation to each site. |

# Comments by site: Cox's Farm

| Comment reference | Summary of Submitted Representation | Modification suggested/agreed (Yes/No) | Pre-submission draft document reference | Officer response/Suggested modification if made and location within document |
|---|---|---|---|---|
| | **General comment/modifications** | | | |
| | **Preferred restoration objective** | | | |
| PM10 | The restoration sub-section fails to give adequate prominence to the public rights of way network and its importance to landscape setting locally. The restoration section should be amended to ensure any subsequent restoration scheme preserves, enhances, maintains and improves these features. | Yes | Table 2.2 – Preferred restoration objective | Site Profiles<br>It is agreed that reference should be made to the need to retain and enhance the existing PRoW network on the site. Text should be altered to read *'In addition, there should be no net loss or degradation of the important local footpath* **PRoW** *network in the area,* ***these features should, where possible, be maintained during working and enhanced during restoration.'*** |
| | **Human Health and Amenity** | | | |
| PM11 | A 'Zone of Sensitivity' should be developed whereby mineral extraction should carry strong conditions to offer suitable noise, dust, landscape and historical setting protection to the residents, and setting, of Marston Meysey Conservation area. Proposed standoff area to be the line of the first field boundaries to the west and displayed on the site map. | Yes – in part | Table 2.2 – Human Health and Amenity | Site Profiles<br>It is agreed that reference could be made in the site profile table to a 'zone of sensitivity'. It is not appropriate to incorporate a standoff zone onto the site map as this would be a matter for the planning application process to determine in precise detail. The following text should be added to the bottom of the human health and amenity section: ***'To protect the historic character and residential amenity of Marston Meysey, a 'Zone of Sensitivity' incorporating a proposed minimum 100m 'stand off distances' will need to be negotiated at the planning application stage.'*** |
| | **Landscape and visual** | | | |
| PM12 | A 'Zone of Sensitivity' should be developed whereby mineral extraction should carry strong conditions to offer | Yes – in part | Table 2.2 – Landscape and Visual | Site Profiles<br>It is agreed that reference could be made in the site profile table to a 'zone of sensitivity'. It is not |

| | suitable noise, dust, landscape and historical setting protection to the residents, and setting, of Marston Meysey Conservation area. Proposed standoff area to be the line of the first field boundaries to the west and displayed on the site map. | | | appropriate to incorporate a standoff zone onto the site map as this is a matter for the planning application process to determine. The following text should be text should be added to the landscape and visual section:'...*to protect the historic landscape setting of Marston Meysey village.* **A 'Zone of Sensitivity' will need to be negotiated at the planning application stage.'** |
|---|---|---|---|---|
| | **Archaeology** | | | |
| PM13 | Strengthen wording of the Archaeology section to make reference to the need for appropriate investigation and response in line with PPS5 and its practice guide, Minerals Extraction and the Historic Environment (English Heritage March 2008) and; Minerals Extraction and Archaeology: A Practical Guide (English Heritage June 2008) as the site is likely to include a number of archaeological features. | Yes | Table 2.2 – Archaeology | Site Profiles<br>Agreed, however in light of the introduction of the NPPF and subsequent replacement of PPS5 updated wording was sought from English Heritage and the County Archaeologist. The following text should be added to bottom of the Archaeology section:<br><br>**'Appropriate investigation, mitigation and response in line with the NPPF; PPS5 Practice Guide (or its replacement); Minerals Extraction and the Historic Environment (English Heritage March 2008), and; Minerals Extraction and Archaeology: A Practical Guide (English Heritage June 2008) will be required.'** |
| | **Historic built environment** | | | |
| PM14 | A 'Zone of Sensitivity' should be developed whereby mineral extraction should carry strong conditions to offer suitable noise, dust, landscape and historical setting protection to the residents, and setting, of Marston Meysey Conservation area. Proposed standoff area to be the line of the first field boundaries to the west and displayed on the site map. | Yes - in part | Table 2.2 –Historic built environment | Site Profiles<br>It is agreed that reference could be made in the site profile table to a 'zone of sensitivity'. It is not appropriate to incorporate a standoff zone onto the site map as this is a matter for the planning application process to determine. The following text should be added to the Historic built environment section:<br>*'Mitigation will need to offer robust buffer and landscape screening to the west of the site* **(through the incorporation of a 'Zone of Sensitivity', negotiated at the planning application stage)** *in* |

| | | Traffic and transportation | | | |
|---|---|---|---|---|---|
| | | | | | *order to protect the setting of the Marston Meysey Conservation Area.'* |
| PM15 | | Make reference to the fact that – 'Any permissions will need to be conditioned to mitigate impacts on individual properties adjoining access routes and along HGV movement routes, and control the hours of vehicle movements'. | Yes – In part | Table 2.2 – Traffic and transportation | <u>Site Profiles</u><br>The councils are of the view that this change can be accommodated in part. It is not for this plan to include controls on the hours of vehicle movements as this will be an issue for any subsequent planning application to determine. However, reference can be made to the need to mitigate impacts on individual properties on adjoining access routes. Text should be included to the effect of: *<u>'A Transport Assessment should be submitted with a planning application to identify the measures that will be taken to adequately mitigate or compensate for the anticipated transport and related environmental impacts of the proposal</u> **<u>including impacts on individual properties adjoining HGV access and movement routes.'</u>*** |

## Comments by site: Blackburr Farm

| Comment reference | Summary of Submitted Representation | Modification suggested (Yes/No) | Pre-submission draft document reference | Officer response/Suggested modification if made and location within document |
|---|---|---|---|---|
| | **General comment/modifications** | | | |
| | **Site Description** | | | |
| PM16 | Include reference to the PRoW running centrally through the small parcel of land to the west and for the need to retain access for infrastructure providers. | Yes – in part | Table 2.3 - Site description | Site Profiles<br>Agreed. Incorporate reference to the PRoW on the site. The retention of infrastructure provider access will need to be addressed as part of a planning application process. Insert text to read *'...where vegetation does not offer natural screening. **A PRoW runs through the southern section of the site.'*** |
| | **Preferred restoration objective** | | | |
| PM17 | Amend wording to highlight the importance of the canal project in the area. Wording to state that 'restoration of the canal at this location must be considered within the wider context of the restoration of the Cotswold Canals project as a whole.' | Yes – in part | Table 2.3 – Preferred restoration objective | Site Profiles<br>Agreed in part. Whilst the preferred restoration objective section of the table could more strongly refer to the need for the restoration of the canal network at this location, to suggest that it 'must' would be to pre-determine any restoration scheme proposed through a planning application. Therefore suggested amended wording to read *'Restoration of the canal which bisects the site ~~could also be considered as part of a wider restoration project~~ **should be considered within the wider context of the Cotswold Canals restoration project as a whole.** However,...'* |
| | **Archaeology** | | | |
| PM18 | Strengthen wording of the Archaeology section to make reference to the need for appropriate investigation and response in line with PPS5 and its practice guide, | Yes | Table 2.3 – Archaeology | Site Profiles<br>Agreed, however in light of the introduction of the NPPF and subsequent replacement of PPS5 updated wording was sought from English Heritage and the |

| | | | | |
|---|---|---|---|---|
| | Minerals Extraction and the Historic Environment (English Heritage March 2008) and; Minerals Extraction and Archaeology: A Practical Guide (English Heritage June 2008) as the site is likely to include a number of archaeological features. | | | County Archaeologist. The following text should be added to bottom of the Archaeology section:<br><br>*__'Appropriate investigation, mitigation and response in line with the NPPF; PPS5 Practice Guide (or its replacement); Minerals Extraction and the Historic Environment (English Heritage March 2008), and; Minerals Extraction and Archaeology: A Practical Guide (English Heritage June 2008) will be required.'__* |
| | **Traffic and transportation** | | | |
| PM19 | Strengthen the text in this section to refer to the requirement for improvements to the C124. | Yes | Table 2.3 – Traffic and transportation | <u>Site Profiles</u><br>This change can be accommodated by utilising the same detail as that used for the Cox's Farm traffic and transportation section as both sites could access the C124. Suggested wording to incorporate *'The site should be treated as an extension to nearby sites, utilising existing access arrangements wherever possible. __Access from the site could make use of the C124 although appropriately planned improvements will need to be made to this route to ensure that it is of an appropriate standard for accommodating minerals HGVs.'__* |
| PM20 | Make reference to the fact that – 'Any permissions will need to be conditioned to mitigate impacts on individual properties adjoining access routes and along HGV movement routes, and control the hours of vehicle movements'. | Yes – In part | Table 2.3 – Traffic and transportation | <u>Site Profiles</u><br>The councils are of the view that this change can be accommodated in part. It is not for this plan to include controls on the hours of vehicle movements as this will be an issue for any planning application to determine. However, reference can be made to the need to mitigate impacts on individual properties on adjoining access routes. Text should be included to the effect of: *'A Transport Assessment should be submitted with a planning application to identify the measures that will be taken to adequately mitigate or compensate for the anticipated transport and related environmental* |

| | | | | *impacts of the proposal **including impacts on individual properties adjoining HGV access and movement routes.'*** |
|---|---|---|---|---|

## Comments by site: North Farm

| Comment reference | Summary of Submitted Representation | Modification suggested/agreed (Yes/No) | Pre-submission draft document reference | Officer response/Suggested modification if made and location within document |
|---|---|---|---|---|
| | **General comment/modifications** | | | |
| | **Archaeology** | | | |
| PM21 | Strengthen wording of the Archaeology section to make reference to the need for appropriate investigation and response in line with PPS5 and its practice guide, Minerals Extraction and the Historic Environment (English Heritage March 2008) and; Minerals Extraction and Archaeology: A Practical Guide (English Heritage June 2008) as the site is likely to include a number of archaeological features. | Yes | Table 2.4 – Archaeology | Site Profiles<br>Agreed, however in light of the introduction of the NPPF and subsequent replacement of PPS5 updated wording was sought from English Heritage and the County Archaeologist. The following text should be added to bottom of the Archaeology section:<br><br>***'Appropriate investigation, mitigation and response in line with the NPPF; PPS5 Practice Guide (or its replacement); Minerals Extraction and the Historic Environment (English Heritage March 2008), and; Minerals Extraction and Archaeology: A Practical Guide (English Heritage June 2008) will be required.'*** |
| | **Traffic and transportation** | | | |
| PM22 | Make reference to the fact that – 'Any permissions will need to be conditioned to mitigate impacts on individual properties adjoining access routes and along HGV movement routes, and control the hours of vehicle movements'. | Yes – In part | Table 2.4 – Traffic and transportation | Site Profiles<br>The councils are of the view that this change can be accommodated in part. It is not for this plan to include controls on the hours of vehicle movements as this will be an issue for any planning application to determine. However, reference can be made to the need to mitigate impacts on individual properties on adjoining access routes. Text should be included to the effect of: *'A Transport Assessment should be submitted with a* |

| | | | | *planning application to identify the measures that will be taken to adequately mitigate or compensate for the anticipated transport and related environmental impacts of the proposal **including impacts on individual properties adjoining HGV access and movement routes.'*** |

## Comments by site: Land east of Calcutt

| Comment reference | Summary of Submitted Representation | Modification suggested (Yes/No) | Pre-submission draft document reference | Officer response/Suggested modification if made and location within document |
|---|---|---|---|---|
| | **General comment/modifications** | | | |
| | **Site Description** | | | |
| PM23 | Amend the section to mention that public Water Mains and Sewers may lie across the site. | Yes | Table 2.5 - Site description | Site Profiles<br>Agreed, this information should be incorporated into the site description. Suggested addition to text *'The site is crossed by an oil pipeline, ~~and~~ **low level power lines and possible water mains and sewer. Early consultation with the relevant infrastructure providers to establish the location of installations, and to arrange for them to be diverted and/or safeguarded where necessary should be made.*** |
| PM24 | Early consultation to establish the position of such mains, and to arrange for them to be diverted where necessary should be made to the relevant water/sewerage company. | Yes | Table 2.5 – Any other issues row | Site Profiles<br>To introduce the requirement for consideration regarding the infrastructure running across the site, add an additional row titled 'Any other issues' above the 'Cumulative effects' row with the following text: **'Early consultation with the relevant infrastructure providers to establish the location of installations on site, and to arrange for them to be diverted and/or safeguarded where necessary, should be made as part of any planning application process.'** |
| | **Archaeology** | | | |
| PM25 | Strengthen wording of the Archaeology | Yes | Table 2.5 – Archaeology | Site Profiles |

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| | section to make reference to the need for appropriate investigation and response in line with PPS5 and its practice guide, Minerals Extraction and the Historic Environment (English Heritage March 2008) and; Minerals Extraction and Archaeology: A Practical Guide (English Heritage June 2008) as the site is likely to include a number of archaeological features. | | | Agreed, however in light of the introduction of the NPPF and subsequent replacement of PPS5 updated wording was sought from English Heritage and the County Archaeologist. The following text should be added to bottom of the Archaeology section:<br><br>*'Appropriate investigation, mitigation and response in line with the NPPF; PPS5 Practice Guide (or its replacement); Minerals Extraction and the Historic Environment (English Heritage March 2008), and; Minerals Extraction and Archaeology: A Practical Guide (English Heritage June 2008) will be required.'* |
| | **Traffic and transportation** | | | |
| PM26 | Make reference to the fact that – 'Any permissions will need to be conditioned to mitigate impacts on individual properties adjoining access routes and along HGV movement routes, and control the hours of vehicle movements'. | Yes – In part | Table 2.5 – Traffic and transportation | Site Profiles<br>The councils are of the view that this change can be accommodated in part. It is not for this plan to include controls on the hours of vehicle movements as this will be an issue for any planning application to determine. However, reference can be made to the need to mitigate impacts on individual properties on adjoining access routes. Text should be included to the effect of: *'A Transport Assessment should be submitted with a planning application to identify the measures that will be taken to adequately mitigate or compensate for the anticipated transport and related environmental impacts of the proposal **including impacts on individual properties adjoining HGV access and movement routes.'*** |

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**Comments by site: Land at Cotswold Community**

| Comment reference | Summary of Submitted Representation | Modification suggested (Yes/No) | Pre-submission draft document reference | Officer response/Suggested modification if made and location within document |
|---|---|---|---|---|
| | **General comment/modifications** | | | |
| | **Site Description** | | | |
| PM27 | Make specific reference to the sewage works located on the site. | Yes | Table 2.6 - Site description | Site Profiles<br>Agreed, this information should be incorporated into the site description. Suggested addition to text *'The spine road cycle track also runs along the southern perimeter of the site.* ***A sewage works facility is located within the southern section of the site.'*** |
| PM28 | Wording will need to be introduced to highlight the need for early consultation with the relevant infrastructure company to arrange for the sewage works facility and any associated infrastructure to be safeguarded and/or diverted where necessary. | Yes | Table 2.6 – Any other issues row | Site Profiles<br>To introduce the requirement for consideration regarding the infrastructure running across the site, add an additional row titled 'Any other issues' above the 'Cumulative effects' row with the following text: ***'Early consultation with the relevant infrastructure providers to arrange for the sewage works facility and any associated infrastructure (once location is established) to be safeguarded and/or diverted where necessary should be made as part of any planning application process.'*** |
| | **Archaeology** | | | |
| PM29 | Strengthen wording of the Archaeology section to make reference to the need for appropriate investigation and response in line with PPS5 and its practice guide, Minerals Extraction and the Historic Environment (English Heritage March 2008) and; Minerals Extraction and | Yes | Table 2.6 – Archaeology | Site Profiles<br>Agreed, however in light of the introduction of the NPPF and subsequent replacement of PPS5 updated wording was sought from English Heritage and the County Archaeologist. The following text should be added to bottom of the Archaeology section: |

| | | | | |
|---|---|---|---|---|
| | Archaeology: A Practical Guide (English Heritage June 2008) as the site is likely to include a number of archaeological features. | | | *'Appropriate investigation, mitigation and response in line with the NPPF; PPS5 Practice Guide (or its replacement); Minerals Extraction and the Historic Environment (English Heritage March 2008), and; Minerals Extraction and Archaeology: A Practical Guide (English Heritage June 2008) will be required.'* |
| PM30 | Add 'English Heritage' as a contact that any prospective applicant will need to work closely with when bringing forward proposals. | Yes | Table 2.6 – Archaeology | Site Profiles<br>Agreed, due to the potential for archaeology findings on and around the site associated with the historically important features in the area this change should be accommodated into the archaeology section of the site profile. Text addition to read *'…any applicant will need to work closely with the County Archaeologist **and English Heritage** to develop and implement sufficient and suitable mitigation plans.'* |
| | **Historic built environment** | | | |
| PM31 | Due to the presence of listed buildings within the site boundary. Insert text to the effect of: 'A cultural heritage assessment and conservation plan to inform which buildings might be removed and the measures required to secure the enhancement of the historic farmstead should form part of any mitigation/restoration plan.' | Yes | Table 2.6 – Historic built environment | Site Profiles<br>Agreed, due to the listed status of some of the buildings located towards the centre of the site, information should be included within the plan requesting measures be put in place during operations to limit the impact on these buildings and to incorporate the buildings into any restoration proposals. Additional text should be inserted after the current text in this section and to read ***'A cultural heritage assessment and conservation plan to inform which buildings might be removed and the measures required to secure the enhancement of the historic farmstead should form part of any mitigation/restoration plan.'*** *(proposed to cross reference this point in the restoration section of the site profile)* |
| | **Traffic and transportation** | | | |
| PM32 | Make reference to the fact that – 'Any permissions will need to be conditioned to | Yes – In part | Table 2.6 – Traffic and transportation | Site Profiles<br>The councils are of the view that this change can be |

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|---|---|---|---|---|
| | mitigate impacts on individual properties adjoining access routes and along HGV movement routes, and control the hours of vehicle movements'. | | | accommodated in part. It is not for this plan to include controls on the hours of vehicle movements as this will be an issue for any planning application to determine. However, reference can be made to the need to mitigate impacts on individual properties on adjoining access routes. Text should be included to the effect of: *'These highlighted concerns will need to be addressed through a Transport Assessment submitted with a planning application and to identify the measures that will be taken to adequately mitigate or compensate for the anticipated transport and related environmental impacts of the proposal **including impacts on individual properties adjoining HGV access and movement routes.'*** |

**Comments by site: Land near Compton Bassett**

| Comment reference | Summary of Submitted Representation | Modification suggested/agreed (Yes/No) | Pre-submission draft document reference | Officer response/Suggested modification if made and location within document |
|---|---|---|---|---|
| | **General comment/modifications** | | | |
| | **Site Description** | | | |
| PM33 | Planning consent for the 350 homes detailed has now been granted. Re-word the text to reflect this development and remove 'on appeal' text. | Yes | Table 3.2 – Site description | Site Profiles<br>This change should be accommodated as an update to the current picture in the area. Altered text to read:<br>'~~Outline~~ **Planning** consent for 350 homes at Sandpit Lane...**has been granted** ~~on appeal~~.' |
| | **Traffic and transportation** | | | |
| PM34 | Make reference to the fact that – 'Any permissions will need to be conditioned to mitigate impacts on individual properties adjoining access routes and along HGV movement routes, and control the hours of vehicle movements'. | Yes – In part | Table 3.2 – Traffic and transportation | Site Profiles<br>Whilst this was not a change requested specifically for this site, in light of other comments and concerns about HGV movements in the area and impacts on Calne and surrounding villages along access routes, the councils are of the view that this change could be accommodated in part. It is not for this plan to include controls on the hours of vehicle movements as this will be an issue for any planning application to determine. However, reference can be made to the need to mitigate impacts on individual properties on adjoining access routes. Text should be included to the effect of:<br>*'A Transport Assessment should be submitted with any planning application to identify the measures that will be taken to adequately mitigate or compensate for the anticipated transport and related environmental impacts of the proposal **including impacts on individual properties adjoining HGV access and movement routes.'*** |

## Comments by site: Extensions to Brickworth Quarry

| Comment reference | Summary of Submitted Representation | Modification suggested/agreed (Yes/No) | Pre-submission draft document reference | Officer response/Suggested modification if made and location within document |
|---|---|---|---|---|
| | **General comment/modifications** | | | |
| | **Preferred restoration objective** | | | |
| PM35 | Strengthen the wording in this section to state the need for management of the site post restoration principally for biodiversity. | Yes | Table 4.2 – Preferred restoration objective | Site Profiles<br>This change should be accommodated, additional text to read: *'Restoration must aim to deliver targets within the Wiltshire Biodiversity Action Plan (WBAP) to support BAP habitats and species* **and the site will need to be managed for biodiversity enhancement post restoration.'** |
| PM36 | Further wording in this section could state the need for reviewing opportunities across the remainder of the wider minerals site which already has planning permission, and exploring options to link woodland habitats in the area. | Yes | Table 4.2 – Preferred restoration objective | Site Profiles<br>This change should be accommodated, additional text to read: *'A key focus of the restored site must be the connectivity of habitats both within and around the site*, **seeking opportunities to link restored areas of the neighbouring mineral working consents. Options should be explored to link woodland habitats in the surrounding vicinity** *and ~~also out into~~ the wider countryside area.'* |
| | **Biodiversity and geodiversity** | | | |
| PM37 | Review the detailed ecological site assessment outcomes to determine whether impacts to the New Forest SSSI (hydrologically) have been assessed and make reference to outcomes (i.e whether the site will impact on this feature). | Yes | Table 4.2 – Biodiversity and geodiversity | Site Profiles<br>This issue is referenced in the water environment section of the site profile. Through discussion with the County Ecologist, it has been confirmed that the detailed ecological site assessment does assess potential hydrological impacts to the New Forest SSSI. An addition to the text in this section of the plan can be made to make reference to the need for any planning |

| | | | | applicant to provide evidence that the minerals workings will not impact on the water levels in adjacent areas such as the New Forest SSSI. Suggested text to read: *'As the County Wildlife Sites **and New Forest SSSI** are dependent on both surface water and ground water levels to maintain their special interest...'* |
|---|---|---|---|---|
| | **Landscape and visual** | | | |
| PM38 | As an outcome of the recent Waste Site Allocations DPD examination, it was suggested by the appointed Inspector that any proposals on site, be it waste management operations or mineral working, will need to demonstrate that the interests of the New Forest National Park and its setting are not eroded. The suggested change to the landscape, townscape and visual section of the Waste Site Allocations DPD should therefore be replicated in this section of the Minerals Site Allocations DPD. | Yes | Table 4.2 – Landscape and visual | For consistency and conformity with the approach taken for the site as detailed through the Waste Site Allocations DPD, a requirement to strengthen the wording of the site profile by addressing the issue of proximity to the New Forest National Park is proposed. The following text should be incorporated at the start of the landscape and visual section of the site profile: **_'The proximity of the New Forest National Park will need to be fully considered through any subsequent planning application process. Proposals for further mineral working will need to demonstrate that the interests of the New Forest National Park and its setting are not eroded.'_** |

**Wiltshire Council**

**Cabinet**

**19 June 2012**

Subject:           **Children in Care Commissioning Strategy 2012-2015**

Cabinet member:   **Councillor Lionel Grundy - Children's Services**

Key Decision:     **No**

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**Executive Summary**

The report outlines the background and context for producing the Children in Care Commissioning Strategy 2012-2015. It summarises the content of the strategy highlighting the commissioning priorities.

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**Proposal**

**To agree the strategic direction and priorities outlined in the Children in Care Commissioning Strategy 2012-2015 (see Appendix 1).**

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**Reason for Proposal**

The Wiltshire Children and young People's Trust brings together a wide range of stakeholders including young people and partner agencies. The Trust has developed a commissioning strategy covering placements and services for children in care which sets out the strategic direction. The Council has a role as the Corporate parent for children in care and Wiltshire Council Cabinet is being asked to endorse the strategy including the commissioning priorities.

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**Carolyn Godfrey**
**Corporate Director**

**Wiltshire Council**

**Cabinet**

**19 June 2012**

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Subject:          **Children in Care Commissioning Strategy 2012-2015**

**Cabinet member:   Councillor Lionel Grundy - Children's Services**

**Key Decision:     No**

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## Purpose of Report

1.     This report introduces the revised Children in Care Commissioning Strategy 2012-2015. This has been written following a period of consultation. It highlights key commissioning priorities where the Wiltshire Children and Young People's Trust is seeking endorsement from the Wiltshire Cabinet.

## Background

2.     Wiltshire Children and Young People's Trust commissioning strategy for children and young people in care has been produced in line with the Trust's commissioning framework.  The strategy is holistic and covers all services for looked after children. Work on the strategy is being co-ordinated by the Children in Care Commissioning Group.

3.     The Commissioning Strategy takes account of the issues raised following the recent Ofsted Inspection on Safeguarding and Looked After Children. The report raised some specific immediate actions which have been addressed and also identified that the commissioning strategy sets out clear priorities for on-going service development.

## Main Considerations for the Council

4.     The purpose of the Children in Care Commissioning Strategy 2012-2015 is to achieve better outcomes for children and young people by making sure there are sufficient good quality services available locally.  This will involve ensuring:

   • There are services available which, where appropriate, prevent children and young people from coming into care ('edge of care' services) and assist with a return home.
   • A good range of high quality services for children in care, including placements (our aim is 'local placements for local children').
   • All services are cost effective.

4.1     Consultation

Consultation on the initial draft took place from August 2011 to the end of January 2012. This consultation included:

- Consultation with children and young people in care through focus group work, a paper based SNAP survey and an electronic SNAP survey. Focus groups were carried out with Wiltshire's Children in Care Council and paper based surveys were sent to every looked after young person over the age of 7 in Wiltshire's care. All paper survey results were imported to the electronic system.

  The electronic SNAP survey and a copy of the full consultation document were promoted on Sparksite, the young people's website (http://www.sparksite.co.uk).

- 2 focus group discussions with foster carers.
- 2 workshops were held for social care staff.
- The report was circulated widely and all partner agencies were encouraged to discuss it at regular meetings and forums.

4.2     Summary of the commissioning strategy

The Strategy is divided into two parts:

- Part 1 covers the introduction to the strategy which includes the purpose, links with existing strategies and information on development of the strategy.

  Part 1 also covers the context (both national and local), the needs assessment, financial information, where children in care are placed and performance information.

- Part 2 covers the commissioning priorities. Each commissioning priority covers what we want to achieve, key messages from the consultation, current position and achievements to date, priorities for action and key performance indicators which will be monitored by the Children in Care Commissioning Group.

4.3     Commissioning priorities

The strategy outlines 6 commissioning priorities. The commissioning priorities and what we want to achieve under each priority are summarised below.

- Involving children and young people.

  We want to maximise opportunities for children and young people in care to:
    o Take part in shaping and developing services.

o   Give feedback on existing services they are receiving.

This is also about ensuring children and young people in care are (and feel) listened to, for example in reviews, and that their views are acted upon and help to shape their care plans.

- Good outcomes for children in care including safeguarding.

  We want to achieve the best possible outcomes for children and young people by providing high quality services which focus on children's and young people's needs so that:
    o   Children and young people in care, on the edge of care and leaving care are comprehensively safeguarded.
    o   Assessments and care plans are comprehensive and focus on outcomes.
    o   Reviews continue to happen on time.
    o   Criminal records for looked after young people continue to decrease in number.
    o   All looked after children and young people receive a consistently high quality service from all social care teams including leaving care services.
    o   All looked after children and young people are supported towards a healthy future lifestyle.
    o   Looked after children and young people are supported to give them the best chance of achieving good educational attainment outcomes and leading successful and fulfilling lives.

- Accessing and managing resources.

  We want to develop efficient and responsive processes which:
    o   Enable children and young people to quickly access the services required.
    o   Monitor the quality and effectiveness of these services in achieving change and positive outcomes.
    o   Are multi-agency to ensure a team around the child approach.

- Edge of care.

  We want to achieve a good range of cost effective 'edge of care' services which promote good outcomes by enabling children and young people to remain living safely with their families, where appropriate. These services:
    o   Assist families and extended families to better care for and support children and young people.
    o   Where children do return home after a period of care, the risks are assessed, support is in place if required and plans are clear.
    o   Provide direct support to children and young people increasing self esteem and promoting resilience.

- Placements.

  We want to achieve a good range of placements within a purchasing framework focussing on:
  - Choice.
  - Quality (both of placement and of relationship with carer).
  - Cost effectiveness.
  - Meeting an individual's needs, as close to home as possible (providing that is compatible with the care plan) and close to the education setting.
  - Flexibility.
  - Short-term crisis provision when needed.

  We also want to achieve the following:
  - More timely adoptions.
  - A decrease in the number of moves a looked after young person has to make.
  - Improved longer-term stability of placements.
  - More young people placed with family members and good support given to wider family to help this happen.
  - Young people who are happy in their placements.
  - To find young people a permanent family where possible.
  - Foster carers have all relevant, up to date information to assist them with providing good quality safe care personal to the child or young person's needs.

- Leaving care.

  We want to support care leavers to identify and achieve positive goals focussing on:
  - Promoting good outcomes for care leavers, including effective preparation for independent living.
  - Preventing homelessness.
  - Ensuring a good range of accommodation for 16 to 24 year olds who are vulnerable and have specific housing needs

**Environmental and climate change considerations**

5. Any environmental considerations will be incorporated into contracts involving residential care so that providers reduce the carbon footprint of these buildings.

**Equalities Impact of the Proposal**

6. We have considered any adverse or positive impact from an equalities perspective and have incorporated the identified issues in the strategy. The action plan will be a live working document and this will provide an opportunity to review progress from an equalities perspective.

   Commissioning strategies promote equality of opportunity by specifying and securing services which meet the diverse needs of children, young

people and families in Wiltshire.

As commissioning is a constructive activity which helps to foster good, long-term relationships between services, this strategy will have a positive impact in relationships between stakeholders.

A full Equality Impact Analysis will be completed and regularly updated.

**Risk Assessment**

7.    A Risk Assessment has been undertaken and implementation of the Strategy will reduce risk for children and young people, and financial risk for the Council.

**Financial Implications**

8.    The 2012/13 net Local Authority budget for children in care services is £18,349,100. This does not include expenditure on children in care from Council budgets for the following:
- Referral and assessment team
- Safeguarding teams
- Disabilities teams
- Business support
- Independent Reviewing Officers

9.    Further work will take place on apportioning expenditure on children in care from these budgets. Work is also taking place on calculating expenditure on looked after children from health budgets.

10.    The Council's intentions regarding savings and investments are set out in the Council's financial plan for 2011-15. The Council has prioritised services for vulnerable children and young people within its business plan and has invested in supporting services for children and young people in care, and children and young people on the edge of care, in 2011/12 and 2012/13. Savings have also been achieved through more effective procurement of placements for looked after children and young people.

The implementation of the strategy will support continued improvement in value for money for services for children and young people in care and will inform the financial planning process for 2013/14 and beyond.

**Legal Implications**

11.    There are no direct legal implications in the proposed strategic approach to the commissioning of services for children in care. Legal implications will be taken into account when considering specific proposals.

**Options Considered**

12.    Options and suggestions were considered following the period of consultation and noted in the revised commissioning strategy.

**Conclusions**

13.     The Ofsted report noted that the draft Children in Care Commissioning Strategy is clear in its priorities for ongoing service development. The Strategy clearly identifies the direction of travel and is underpinned by a specific needs assessment as part of Wiltshire's overall strategic needs assessment. Looked after children and young people have made a positive contribution to the formation of the strategy.

**Carolyn Godfrey**
**Corporate Director**

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Date of report: 19 April 2012

**Background Papers**

The following unpublished documents have been relied on in the preparation of this report:

- None.

**Appendices**

Appendix 1    Children in Care Commissioning Strategy 2012-2015

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# WILTSHIRE CHILDREN AND YOUNG PEOPLE'S TRUST

# CHILDREN IN CARE COMMISSIONING STRATEGY

# 2012 to 2015

# CONTENTS

## PART 1      BACKGROUND

## PART 2 COMMISSIONING PRIORITIES

# PART 1 - BACKGROUND

# 1.    SUMMARY

This is the Wiltshire Children and Young People's Trust commissioning strategy for children and young people in care. The strategy has been produced in line with the Wiltshire Children and Young People's Trust commissioning framework.

The overall purpose of this strategy is to ensure that services for looked after children, young people and care leavers are good.

This strategy is holistic and covers all assessment and case management and services for looked after children including health and education. This is consistent with guidance produced by the Department for Education (DfE) on commissioning of support for children in care (Sufficiency Duty Guidance). Work on the strategy is being co-ordinated by the Children in Care Commissioning Group. Terms of reference for this group including membership can be found at Appendix 1.

The Strategy is divided into two parts.

Part 1 covers the introduction to the strategy which includes the purpose, links with existing strategies and information on development of the strategy.

Part 1 also covers the context (both national and local), the needs assessment, financial information, where children in care are placed and performance information.

Part 2 covers the commissioning priorities which are listed below:

- INVOLVING CHILDREN AND YOUNG PEOPLE

- GOOD OUTCOMES FOR CHILDREN IN CARE
  Including safeguarding

- ACCESSING and MANAGING RESOURCES

- EDGE OF CARE

- PLACEMENTS

- LEAVING CARE

For each priority, we have set out what we want to achieve, messages from the consultation, priorities for action and key performance indicators which will be monitored by the Children in Care Commissioning Group. The priorities will be developed into an implementation plan which will include timescales and success criteria. The performance indicators for each priority will be combined into a performance report which will be used to monitor the progress of the strategy. Appendix 2 outlines the current position and achievements to date for each commissioning priority.

The 2012 Ofsted inspection of safeguarding and looked after children noted that the overall effectiveness for looked after children, young people and care leavers was adequate and capacity to

improve was good. Four aspects of the inspection of looked after children were graded by Ofsted as "good": capacity for improvement, enjoying and achieving, economic wellbeing, and ambition and prioritisation. One aspect was graded as "outstanding": making a positive contribution, including user engagement. The recommendations made by Ofsted have been included in the commissioning priorities.

The Ofsted report noted that the draft Children in Care Commissioning Strategy was clear in its priorities for ongoing service development and was underpinned by a specific needs assessment as part of Wiltshire's overall strategic needs assessment.

The diagram on the following page outlines the looked after children system. To achieve good outcomes for looked after children and young people, the whole system needs to work well together.

**The Looked After System**

Children and Young People's Trust
Commissioning Executive
Multi-agency Children in Care
Commissioning Group

Contracts and Procurement

Decision-making panels

Quality Assurance

LAC Advocacy

Independent Reviewing Officers

Independent Visitors Scheme

Management information

Commissioning

CHILDREN AND YOUNG PEOPLE VOICE AND INFLUENCE

Service Providers include assessment and case management, edge of care and placements

Referral and Assessment and Safeguarding Teams

Looked after Teams

Wiltshire Fostering & Adoption

Housing and Homelessness

Virtual School

Independent Sector Fostering and Adoption

Specialist LAC and other Health Services including CAMHS

Edge of care services including Family Support

## 2. INTRODUCTION

### 2.1 Purpose of the commissioning strategy

The purpose of the Children in Care Commissioning Strategy 2012-2015 is to achieve better outcomes for children and young people by making sure there are sufficient good quality services available locally.  This will involve ensuring:

- There are services available which, where appropriate, prevent children and young people from coming into care ('edge of care') and assist with a return home.
- Effective assessment and case management and a good range of high quality services for children in care, including placements (our aim is 'local placements for local children').
- All services are cost effective.

The strategy has been produced in line with the Wiltshire Children and Young People's Trust Commissioning Framework.  The diagram below produced by the Commissioning Support Programme summarises the elements of strategic commissioning. The Commissioning Support Programme was funded by the Department for Education to improve commissioning across children's services.



### 2.2 Links with existing strategies

There are a number of other strategies which relate to the Children in Care Commissioning Strategy. These are:

- The Wiltshire Children and Young People's Plan 2012-2015. This is the Children and Young People's Trust Partnership's overarching plan for children and young people in Wiltshire.
- Employment and Skills Strategy for Wiltshire.
- Young People's Substance Misuse Treatment Plan.
- Teenage Pregnancy Strategy.
- Wiltshire Youth Offending Service – Youth Justice Plan 2010/2012.
- Reducing Child Poverty Strategy.
- Hidden Harm Strategy.
- Family and Parenting Support Commissioning Strategy.
- Emotional Wellbeing and Mental Health Commissioning Strategy.
- 11-19 Commissioning Strategy.
- Apprenticeship Action Plan.

## 2.3 Developing and implementing the children in care commissioning strategy

The Children in Care Commissioning Group is co-ordinating the development and implementation of the Children in Care Commissioning Strategy. This is a multi-agency group which reports to the Wiltshire Children and Young People's Trust Commissioning Executive. The terms of reference including membership are included at Appendix 1. The membership of this group is continually reviewed. For example, an action for 2012 is for a foster carer representative to join this group.

The initial consultation period on the draft took take place for 12 weeks from 28th July to 20th October 2011. This was then extended to the 20th of January 2012 to allow more time for consultation with children in care and to link the development of the strategy with the review of the social care Family Support Service. Consultation included the following:

- A review of progress in implementing the previous placements strategy.
- Obtaining views of children and young people in care through the Children in Care Council and a specific focus group on the commissioning strategy.
- Paper based surveys were sent to every looked after young person over the age of 7 in Wiltshire's care. All paper survey results were imported to the electronic system. The electronic SNAP survey and a copy of the full consultation document were promoted on Sparksite, the young people's website (http://www.sparksite.co.uk).
- Feedback given at a workshop for independent sector providers of residential and foster care held on 20 July 2011.
- 2 focus groups for foster carers.
- 2 workshops for social care staff.
- Discussion at various groups and fora.
- Analysis and work undertaken by the Sufficiency Duty Task Group (focused on securing sufficient accommodation for children in care in line with statutory guidance).

The table below gives further information on the consultation responses from children and young people:

| Participants | Total number | Male | Female | Young people with disabilities | BAME young people | Age range |
|---|---|---|---|---|---|---|
| Focus groups | 8 | 1 | 7 | 1 | 0 | 8-12 |
| SNAP survey | 56 | 25 | 31 | 8 | 5 | 7-19 |
| Total | 64 | 26 | 38 | 9 | 5 | |

## 3. CONTEXT
## including overall needs analysis and financial information

### 3.1   National Context

#### 3.1.1   Statutory Framework

The Government has revised the legal framework for children in care. The revised framework covers all aspects of the care system. This is summarised in the diagram below which has been produced by the Department for Education.
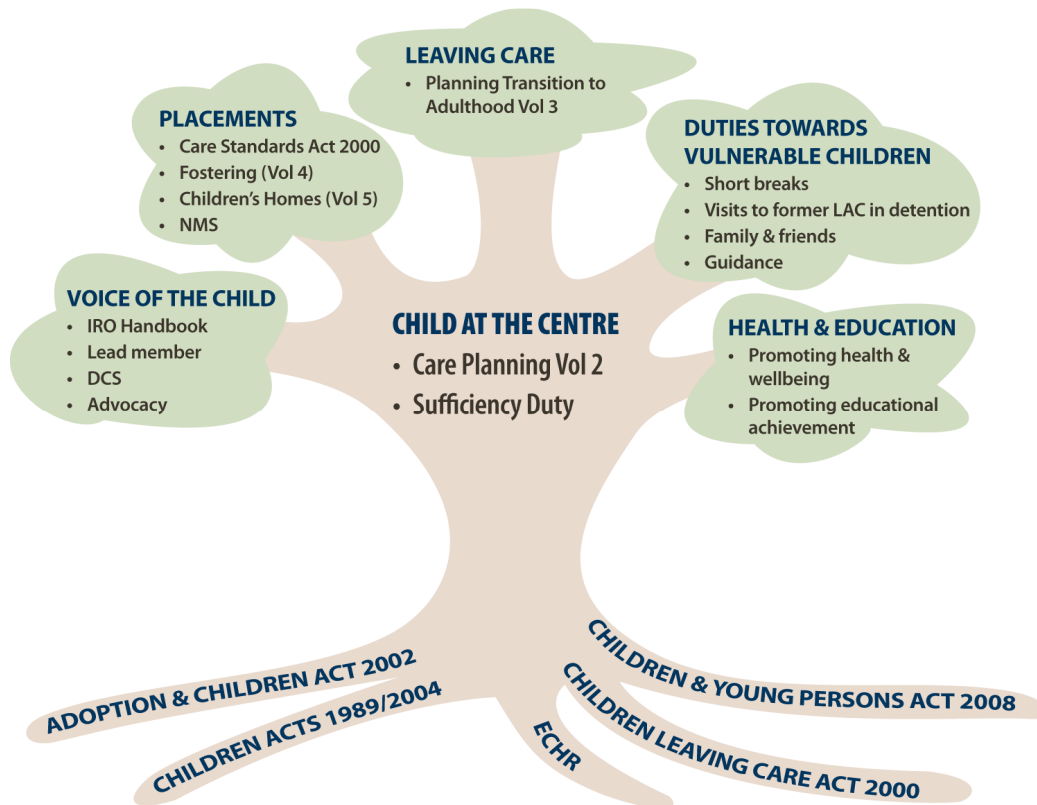


Note – 'NMS' stands for National Minimum Standards, DCS stands for Director of Children's Services and ECHR stands for European Court of Human Rights.

The framework covers all aspects of a child's journey through care, including health, education and ensuring the child's voice is heard in the care process. The framework also includes regulations and guidance relevant to children's homes and fostering services providers. These regulations and guidance are designed to work together as a coherent whole, helping give local authorities the tools to ensure high quality care for all their looked after children and young people.  The revised legal framework can be found at
http://www.education.gov.uk/childrenandyoungpeople/families/childrenincare/regs.

The revised legal framework includes statutory guidance on securing sufficient accommodation for children in care. This is referred to as the sufficiency duty. The sufficiency duty requires local authorities to take steps to secure local accommodation which meets the needs of children in care. The duty includes securing services for children and young people on the edge of care.

This commissioning strategy for children in care sets out plans for ensuring a sufficient supply of placements and demonstrates a whole system approach to early intervention and prevention.

### 3.1.2   Sufficiency duty commissioning standards

The Department for Education has produced guidance and information to assist Councils with ensuring they have sufficient placements. This includes guidance on commissioning standards which will raise the quality of commissioning practice. The 6 standards focus on:

- Individual assessment and care planning.
- Commissioning decisions.
- Strategic needs assessment.
- Market management.
- Collaboration.
- Securing services.

The 6 standards have informed the commissioning priorities and were used as a focus for discussions during the consultation process.

The Department for Education has also recently published a residential data pack to give commissioners and providers a better picture of how children's homes are being used and to promote debate about increasing the quality of residential provision.

### 3.1.3   Open Public Services White Paper

The Open Public Services White Paper sets out proposals for extending opportunities for a range of providers to deliver services. The White Paper highlights some local government services where options for delivery "*will switch the default from one where the state provides the service itself to one where the state commissions the service from a range of diverse providers"* (section 5.2). Support for looked after children is included in the list of services the Government is consulting on about *"how to go further in opening up locally commissioned services."* (Section 5.8).

### 3.1.4   Promoting the Quality of Life of Looked After Children and Young People

In October 2010 the National Institute of Clinical Excellence (NICE) produced guidance on promoting the quality of life of looked after children and young people. The guidance includes 52 recommendations with suggestions on actions which should be taken.

The guidance is for all those who have a role in promoting the quality of life (physical health and social, educational and emotional wellbeing) of looked-after children and young people.

The recommendations cover local strategy and commissioning, multi-agency working, care planning and placements, and timely access to appropriate health and mental health services. In particular, the recommendations aim to:

- promote stable placements and nurturing relationships
- support the full range of placements, including with family and friends
- encourage educational achievement
- support the transition to independent living
- meet the particular needs of looked-after children and young people, including those from black and minority ethnic backgrounds, unaccompanied asylum seekers, and those who have disabilities
- place looked-after children and young people at the heart of decision making

### 3.1.5  Munro Review of Child Protection

The Munro Review of Child Protection: Final Report (2011) makes recommendations about the child protection system. This includes stressing the importance of early help and support reinforcing the findings of the national reviews conducted by:

- Graham Allen on Early Intervention.
- Frank Field on Poverty and Life Chances.
- Dame Clare Tickell on the Early Years Foundation Stage.

Munro states that:

*The case for preventative services is clear, both in the sense of offering help to children and families before any problems are apparent and in providing help when low level problems emerge. From the perspective of a child or young person, it is clearly best if they receive help before they have any, or have only minor, adverse experiences. Evaluative research provides the same message, showing that there are a number of helping methods that have a good record of reducing the later incidence of adverse outcomes for children and young people but that, in comparison, services offered once problems become severe have a much lower effectiveness rate. The reviews conducted by Graham Allen MP, Rt Hon Frank Field MP and Dame Clare Tickell share this review's belief in the importance of providing help early.*

*From this review's point of view the three key messages are that:*

- *preventative services will do more to reduce abuse and neglect than reactive services;*
- *coordination of services is important to maximise efficiency; and*
- *within preventative services, there need to be good mechanisms for helping people identify those children and young people who are suffering or likely to suffer harm from abuse or neglect and who need referral to children's social care.*

(Professor Eileen Munro (2011) Chapter 5: Sharing responsibility for the provision of early help in *The Munro Review of Child Protection: Final Report, A child-centred system.*)

### 3.1.6  Public Health Outcomes Framework

The Public Health Outcomes Framework was published in January 2012 and sets out the desired outcomes for public health and how these will be measured.

The framework concentrates on 2 high-level outcomes to be achieved:

- Increased life expectancy.
- Reduced differences in life expectancy and healthy life expectancy between communities.

A set of support public health indicators will help focus understanding of progress year by year nationally and locally. The indicators are grouped into 4 'domains':

- Improving the wider determinants of health.
- Health improvement.
- Health protection.
- Healthcare public health and preventing premature mortality.

Emotional wellbeing of looked after children is included as an indicator in Domain 2 (Health Improvement). This has been taken into account in the commissioning priority "good outcomes for children in care".

### 3.1.7 Research on what works

The Centre for Excellence and Outcomes for Children's Services has produced 3 Knowledge Reviews including up to date evidence on what works for children and young people in care. The Knowledge Reviews include evidence from research, validated practice and views of professionals.

## 3.2 Local context

### 3.2.1 Values

A set of values underpins the Children in Care Commissioning Strategy. These values will inform the work of all agencies that support children in care.

The values have been amended to reflect how they were written for consultation with children and young people. Young people were asked what key values they thought were most important. The values are set out below and are ranked in order of priority:

| Statement |
| --- |
| Make sure children and young people have a say in decisions that affect their lives and with the planning of services. |
| Help children, young people and their families to think about what might happen in the future, and to cope and feel ok if things don't always go how we want them to. |
| Help children in care get on better at school and support their learning. |
| Make sure that children and young people feel happy and healthy. |
| All agencies working with children and young people in care should be working together so you do not have to keep telling people the same things. |
| Provide services for children in care that are understanding and children and young people can get in touch with easily. |
| Understand everyone is different and has different needs and make sure adults working with children in care think about this. |

### 3.2.2 Wiltshire Children and Young People's Plan 2012-2015

The Wiltshire Children and Young people's Plan 2012-2015 is a high-level 3 year plan which outlines the vision and high level outcomes for children and young people in Wiltshire.

Our vision is:

> "To improve outcomes for children and young people in Wiltshire; ensure good safeguarding practice; reduce, prevent and mitigate the effects of child poverty; and enable resilient individuals, families and communities."

The detail of actions we will take to improve outcomes for children and young people and how we will measure our progress are included in the range of commissioning strategies and strategic plans. These documents can be found on the Children and Young People's Trust website at http://www.wiltshirepathways.org.

### 3.2.3 Complex Families Project

In December 2011 the government announced additional funding for local authorities to work with partners to radically transform the lives of the country's most troubled families. In Wiltshire we are referring to this as the Complex Families Project.

The project aims to do the following:
- To ensure improved life chances and outcomes for children and young people who live in families with complex problems.
- To use resources in the most cost effective way by maximising opportunities for earlier intervention.

This is a "whole system" project which will improve access arrangements, pathways to services and ensure that services make a difference to the lives of children, young people and their families. There will be a particular focus on families where parents have substance misuse problems, mental health difficulties and where there is domestic violence or offending behaviour.

The project will focus on earlier intervention and on the interface between targeted and specialist services i.e. it will include a focus on those families who fall just below the social care threshold but where there are still significant concerns about parenting and children's welfare. Lessons from some high profile Serious Case Reviews have stressed the importance of getting this interface right.
By getting this right children will be safer and more children will be able to stay at home living with their families and have better life chances as intensive support will be offered earlier.

The project will be multi-agency. We will be learning the lessons from our own Family Intervention Project (FIP) and other FIPs across the country on the importance of multi-agency working.

The project is about efficiency and effectiveness. Processes will be leaner and it is anticipated that expenditure by the local authority and other agencies on complex families will reduce and outcomes will improve. Over time there will be a shift in use of resources away from specialist services (levels 3 and 4) to targeted services (level 2).

The work will be evidence based. It will be informed by an analysis of what is happening in Wiltshire across different agencies, and also by research and good practice examples from elsewhere.

## 3.3    Needs assessment

### 3.3.1    The Joint Strategic Needs Analysis
The Joint Strategic Assessment for Wiltshire (JSA) provides a strategic analysis of need.

The Wiltshire JSA, and a JSA for each of Wiltshire's 20 community areas, are available on the Intelligence Network at www.intelligencenetwork.org.uk.

A specific needs analysis relating to children and young people is produced annually. The latest needs analysis can be found at www.wiltshirepathways.org/UploadedFiles/Needs_Assessment.doc.

### 3.3.2    Key features of Wiltshire
Wiltshire is a large, predominantly rural and generally prosperous county located in the south-west of England. The total population in Wiltshire is estimated to be 461,480 (mid year estimate 2011) and rising. Nearly half of the population live in towns or villages with fewer than 5,000 people. A quarter of the county's inhabitants live in settlements of fewer than 1,000 people.

Bigger concentrations of population can be found in the cathedral city of Salisbury, the county town of Trowbridge, and Wiltshire's many market towns, including Chippenham, Devizes, Marlborough, and Wootton Bassett.

Wiltshire is characterised by the scale of its military presence which is one of the largest in the country. Wiltshire therefore has a significant proportion of children and young people with parents employed in the armed forces. This brings with it the challenges of turbulence and disruption to family life and learning due to children moving schools as their parents are posted to different locations and the anxiety felt whilst parents are away on active duty. This presents challenges both to statutory services and also to military welfare services. In January 2011, 4,893 (7.6%) of children and young people in Wiltshire schools had a parent in the armed forces.

### 3.3.3  0 to 19 years population

Of the total population (mid year estimate 2011), the number of children and young people aged 0-19 is 114,390 (24.8%) which is more than the national average of 23.8%.

The table below shows the numbers and percentages of children by age band based on the 2011 mid year estimates:

| Wiltshire Population | Number | % of population |
| --- | --- | --- |
| 0-4 | 26,310 | 5.7 |
| 5-9 | 26,220 | 5.7 |
| 10-14 | 29,990 | 6.5 |
| 15-19 | 31,870 | 6.9 |
| 0-19 | 114,400 | 24.8 |

Children and young people from minority ethnic groups account for 8.3% of pupils in primary schools and 6.7% of pupils in secondary schools. This is significantly below the national average of 24.5% and 20.6% respectively. The largest group is made up of children and young people from White and Black Caribbean and White and Asian communities. There has been a more recent increase of children and young people from Western and Eastern European countries. In 2011, 3.4% of pupils speak English as an additional language.

### 3.3.4  Deprivation

Although Wiltshire ranks amongst the least deprived areas of England (245th out of 326), it contains significant pockets of deprivation.

The average Indices of Multiple Deprivation rank for Wiltshire's Lower Super Output Areas (LSOAs) compares favourably against the England benchmark in terms of overall deprivation. However, the county has seen an increase in relative deprivation since the 2007 Indices. This is shown by the average IMD ranking falling from 23,814 to 22,229.

The areas of greatest deprivation in Wiltshire, as determined by the Indices of Multiple Deprivation, are located in parts of Trowbridge, Salisbury, Chippenham, Westbury, Calne and Melksham.

10 most deprived LSOAs in Wiltshire:

| Local Name | National Rank of IMD 2010 | Rank in Wiltshire |
| --- | --- | --- |
| Salisbury St Martin – central | 2,732 | 1 |
| Trowbridge Adcroft – Seymour | 3,837 | 2 |
| Trowbridge John of Gaunt – Studley Green | 3,886 | 3 |
| Salisbury Bemerton – west | 4,450 | 4 |
| Salisbury Bemerton – south | 5,046 | 5 |

| | | |
|---|---|---|
| Calne Abberd – south | 6,881 | 6 |
| Melksham North – north east | 6,903 | 7 |
| Chippenham Queens – east | 7,144 | 8 |
| Trowbridge Drynham – Lower Studley | 7,337 | 9 |
| Westbury Ham – west | 7,616 | 10 |

Using the combined IMD for the first time, Wiltshire now has one LSOA in the 10% most severely deprived in England: Salisbury St Martin – central. This area is also now in the 10% most deprived in England with regards to Health Deprivation and Disability; again, this is the first time that Wiltshire has had an LSOA in this category.

In Wiltshire 12% of children live in poverty of which 72% live in lone parent families. The figure for children living in poverty in our statistical neighbours is 14% and the figure nationally is 22%.

The proportion of children and young people in Wiltshire in primary schools who are entitled to free school meals is 9.9%. This is below the statistical neighbour's average of 11.7% and significantly below the national average of 17.1%.

The proportion of children and young people in Wiltshire in secondary schools who are entitled to free school meals is 6.1%. This is below the statistical neighbour's average of 8.6% and significantly below the national average of 14.6%.

Wiltshire has generally been below statistical neighbours and the national average in terms of proportions of pupils entitled to free schools meals due to the scale of military families in Wiltshire who do not usually qualify for free school meals, although they share many of the same needs.

### 3.3.5   Number of children in care

On 31 March 2012 there were 408 children in care. The number of children in care has increased by 25 or 6.1% in comparison to March 2011 (383).  The March 2012 data has been used to enable comparison with other local authorities of the rate per 10,000 populations of children in care.

On 31 March 2012 88% of children in care were white British in comparison to 90.5% of the total white British 0 to 18 population. 4.4% of children in care were of mixed heritage, 0.9% Asian or Asian British and 6.65% from other ethnic groups. This is summarised in the table below:

| | White British | Mixed heritage | Asian or Asian British | % black or black British | Other ethnic groups | Total |
|---|---|---|---|---|---|---|
| **Number of children in care** | 408 | 18 | 4 | 1 | 26 | 408 |
| **% children in care** | 88% | 4.4% | 0.9% | 0.25% | 6.4% | 100% |
| **% overall 0 to 18 population** | 90.5% | 2.5% | 1.1% | 0.5% | 5% | 100% |

The rate per 10,000 for children in care at 31 March 2012 was 40.2. The latest comparative data available shows that on 31 March 2011 the statistical neighbour rate was 39.5 and the national average rate was 59.

The table and graph below outline the increase in children in care during 2011/12:

| Month | Apr-11 | May-11 | Jun-11 | Jul-11 | Aug-11 | Sep-11 | Oct-11 | Nov-11 | Dec-11 | Jan-12 | Feb-12 | Mar-12 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| No. Children in Care | 391 | 393 | 397 | 404 | 403 | 387 | 383 | 384 | 393 | 400 | 406 | 408 |



**Number of Children in Care 2011/12**
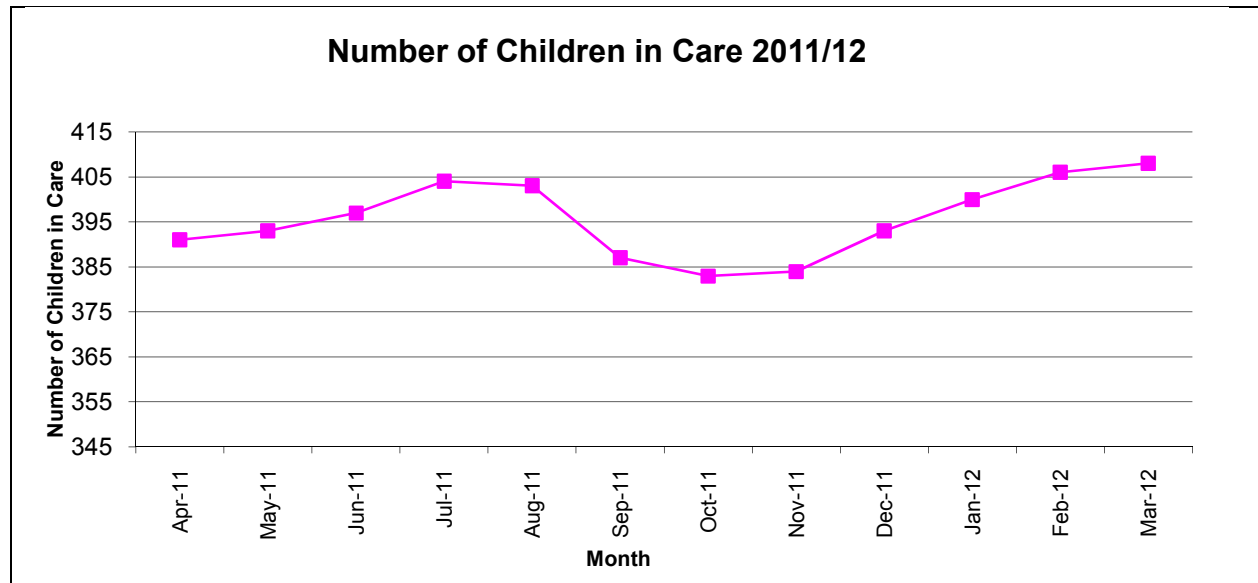
The number of children in care has increased from 271 in 2007 to 408 at the end of March 2012. The year on year increase (April to March) was as follows:

- From 2007 to 2008 increase of 29.
- From 2008 to 2009 increase of 38.
- From 2009 to 2010 increase of 13.
- From 2010 to 2011 increase of 33.
- From 2011 to 2012 increase of 24.

This is summarised in the chart below:



**Children In Care as at 31 March 2012**
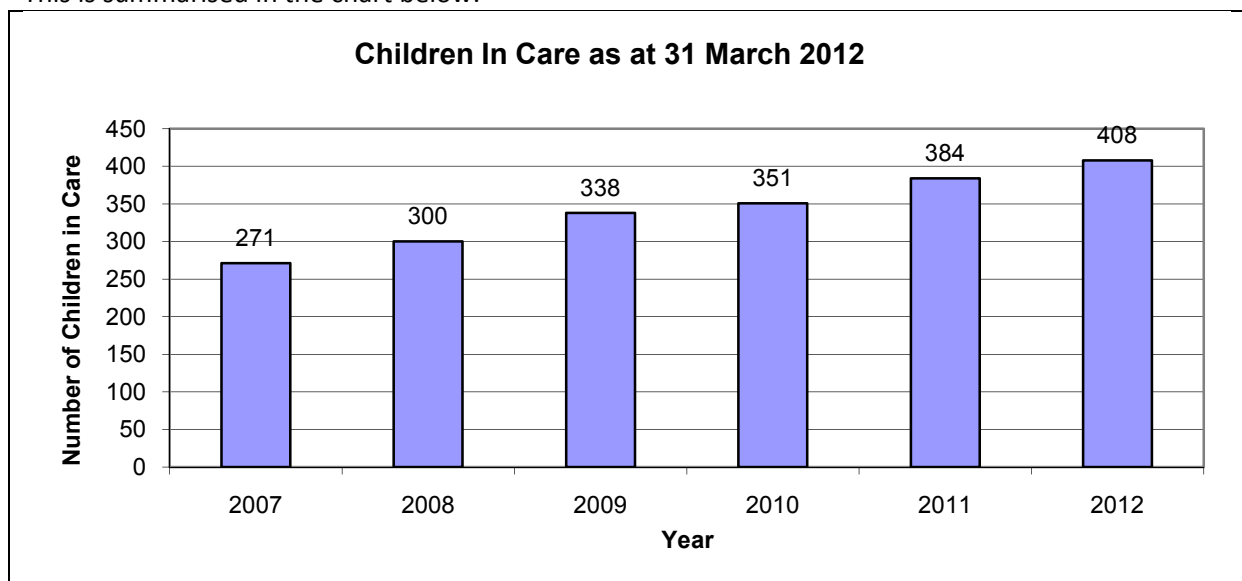
Of the 408, 170 or 41.7% were looked after under voluntary agreements under Section 20 of the Children Act 1989. This compares to the latest comparative data for 2011 which shows an English average of 31%.

An audit of a sample of Section 20 cases has recently taken place. A detailed analysis is also taking place on the reasons for the increase in the children in care population.

## 3.4 Financial issues

### 3.4.1 Local financial context

The Council's intentions regarding savings and investments are set out in the Council's financial plan for 2011-15. The Council has prioritised services for vulnerable children and young people within its business plan and has invested in supporting services for children and young people in care, and children and young people on the edge of care. Savings have also been achieved through more effective procurement of placements for looked after children and young people.

The implementation of the commissioning strategy will support continued improvement in value for money for services for children and young people in care and will inform the financial planning process for 2013/14 and beyond.

Savings and investments identified for services for children in care are as follows:
- Savings of £750,000 were achieved in 2011/12 through a renegotiated block contract and negotiations with service providers on placement costs.
- The Council's financial plan for 2011 – 2015 also identifies areas for investment in protecting and safeguarding vulnerable children. Details are set out in the extract from the financial plan below.

*"The number of looked after children has continued to increase…….. This is due to a multiplicity of factors and is echoed across the country as all local authorities respond to pressures and demands of homelessness, the increase in vulnerable adolescents and the increase in child protection referrals.*

*We have responded to these pressures by developing in-house fostering provision, recruiting local carers and expanding schemes such as supported lodgings and semi-independent accommodation for vulnerable teenagers. Our service continues to need to expand to meet the increase in numbers; dedicated foster carers are needed for unaccompanied asylum seekers, disabled children, those requiring respite and vulnerable teenagers. In 2010/11 there was a significant increase in the levels of service needed and this led to a shortfall in the budget – this deficit needs addressing to respond to these needs. Our family placement service also needs to strengthen its post adoption support to meet the needs of those young people who have been adopted with complex health needs due to maternal drug and alcohol and parental health issues. A range of strategies are being put in place to both reduce the need for high cost external placements and take preventative action."*

Health costs for looked after children are met by the Primary Care Trust when a child is placed out of area. The Department of Health is likely to introduce a tariff to cover the costs of health assessments and reviews in the future.

This could significantly increase the budget required to undertake health assessments and reviews for children placed with foster carers or residential providers outside Wiltshire.

Under the Department of Health's Responsible Commissioner Guidance, there is a cost to the PCT budget for any secondary health care provided to looked after children who are placed outside Wiltshire's borders.

### 3.4.2    2012/13 budget for children in care

The 2012/13 net Local Authority budget for children in care services is £24,498,149. Details are noted in the table below. Further work will take place on apportioning expenditure on children in care from these budgets. Work is also taking place on calculating expenditure from health budgets.

Expenditure on Children in Care 2012/13:

| Item | Gross budgets | Recharges | Income | Net budget | Notes |
|---|---|---|---|---|---|
| External placements | £9,027,500 | | | £9,027,500 | Independent Fostering Agency Allowances & Residential. Placements including Disability. This figure does include some externally purchased respite. |
| Towpath Rd (preparation for independent living for 16+) | £288,600 | | £10,000 | £278,600 | Contract for Services – 7 bedded unit. |
| Permanency placements | £90,000 | | | £90,000 | Special Guardianship arrangements to allow adoptions/long term arrangements to take place. |
| UASC /Asylum seekers | £583,300 | | £430,000 | £183,300 | Home Office grant available for the first 25 UASCs. |
| Placements Services in-house | £3,439,500 | | | £3,439,500 | Internal Foster Carers Allowances. |
| LAC & 16+ teams | £2,492,900 | | | £2,492,900 | Staffing Costs £1,366k + Independent Living Payments £1127k incl. transport. |
| Fostering team | £1,211,800 | | | £1,211,800 | Staffing Costs £1,151k + £112k Foster carer recruitment & training plus client costs. |
| Adoption services | £1,218,900 | | | £1,218,900 | Staffing costs £431k + adoption allowances £788k + virement in transition £12k. |
| Host family scheme (Prevention of homelessness of young people) | £35,500 | | | £35,500 | Independent Living Payments. |
| Education services LAC | £356,729 | £13,860 | £150,000 | £221,100 | Staffing Costs £168k + Educational fees & ICT support for LAC £203k. |
| The Aspire Centre (new for 2012/13) | £150,000 | | | £150,000 | Staffing and running costs. |
| **Totals** | **£18,952,960** | **£13,860** | **£590,000** | **£18,349,100** | |

The Net LA budget has increased by £1,616,938 from 2011/12 to 2012/13 comprising:

| Inflation | £584,132 |
|---|---|
| Demand/growth | £987,611 |

| | |
|---|---|
| Aspire Centre | £150,000 |
| Savings Respite | -£150,000 |
| Pay growth | £45,195 |
| **Total** | **£1,616,938** |

Further direct and indirect costs relating to LAC include the following:

| | |
|---|---|
| Safeguarding teams – who hold approximately 50% of LAC cases | £2,681,800 |
| LAC participation and involvement e.g. Children's Rights Services and specialist LAC in Voice and Influence and proportion of cost of Voluntary Sector Youth Development Coordinator | £148,011 |
| Lead Commissioner for LAC | £45,138 |
| New social care family support intervention service – half | £350,000 |
| Family Group Conferencing service – half – focusing on Child Protection issues | £37,500 |
| Management costs – per CIPFA benchmarking | £160,502 |
| Internal and External legal services | £1,194,483 |
| Client transport | £950,067 |
| Virtual Head teacher for LAC | £221,183 |
| Personal Advisers for LAC within teams | £257,990 |
| Children's Services buyers service – per CIPFA benchmarking | £102,375 |
| **Total** | **£6,149,049** |

## 3.5 Where children in care are placed

### 3.5.1 Type of placements

As at 31 March 2012 there were 408 children in care in Wiltshire. Since 2007/8 there has been a downward trend in the numbers placed in residential provision from 62 young people on 31st March 2008 to 41 young people on 31st March 2012. This is a reduction from 18.5% of the total population of those in care to 10%. This is outlined in the table below. Please note 2011/12 figures for other authorities are not currently available.

| Indicator | Wiltshire NB. For all years, numbers as at 31st March | | | | | English average 2010/11 | South West average 2010/11 | Statistical neighbour Average 2010/11 |
|---|---|---|---|---|---|---|---|---|
| | 2007/8 | 2008/9 | 2009/10 | 2010/11 | 2011/12 provisional | | | |
| % in residential including residential schools | 18.5% (62) | 16.5% (56) | 13.8% (48) | 10% (38) | 10% (41/408) | 12% | 11% | |
| % in foster care | 69% (231) | 73% (246) | 75% (264) | | 64.2% (262/408) | 74% | 75% | 73% |
| % fostered by family or friends | 8.7% | 9.7% | 10.6% | 14% | 14% (57/408) | | | |

There has been a significant increase over the last couple of years in the number of children and young people fostered by friends and family.

### 3.5.2 Independent sector provision

As at 27 April 2012 29 young people were placed in residential care homes at a weekly cost of between £2,200 and £5,800 per week. The average weekly cost of a residential care home placement was £3,392 per week. The residential placements included 1 mother and baby placement and 3 solo placements.

The total number of independent fostering placements on 27 April 2012 was 87 which included 3 mother and baby placements and 2 placements for unaccompanied asylum seeking children. The weekly cost of placements varied from £585 to £1,519 per week. Average weekly costs varied according to the age of the child and complexity of needs.

## 3.6 Children in care performance information

As at 27 April 2012 29 young people were placed in residential care homes at a weekly cost of between £2,200 and £5,800 per week.
The average weekly cost of a residential care home placement was £3,392 per week. The residential placements included 1 mother and baby placement and 3 solo placements.

The total number of independent fostering placements on 27 April 2012 was 87 which included 3 mother and baby placements and 2 placements for unaccompanied asylum seeking children. The weekly cost of placements varied from £585 to £1,519 per week. Average weekly costs varied according to the age of the child and complexity of needs.

### 3.6.1 Stability of placements

The table below shows that since 2007/8 there has not been consistent or continuous improvement of placement stability in Wiltshire. The figures for 2010/11, where comparative data is available, shows that our placement stability is worse than that of our statistical neighbours, the southwest average and the English average - we have more looked after children with 3+ placements during the year and lower numbers of looked after children who have had at least 2.5 years in the same placement for at least 2 years. Provisional data for 2011/12 is showing a slight improvement in terms of placement stability in Wiltshire. Comparative data for 2011/12 is not yet available.

| Indicator | Wiltshire | | | | | English average 2010/11 | South West average 2010/11 | Statistical neighbour average 2010/11 |
|---|---|---|---|---|---|---|---|---|
| | 2007/8 | 2008/9 | 2009/10 | 2010/11 | 2011/12 provisional | | | |
| LAC with 3+ placements during the year | 11.3% | 8.6% | 12.9% | 14% | 13.5% 55/408 | 11% | 13% | 10% |
| Looked after for at least 2.5 years in same placement for at least 2 years | 70.3% | 63.3% | 69.1% | 71% | 65.6% 82/125 | 69% | 69% | 70% |

### 3.6.2 Quality of services

The table below shows that our performance in terms of quality of services in 2010/11 was better than our statistical neighbours, southwest and English averages – a higher percentage of LAC received health and dental checks, a higher percentage of LAC achieved 5 or more GCSEs grades A*-C

and a lower percentage of LAC aged 10+ were given a final warning or reprimand or convicted during the year. Comparative data for 2011/12 is not yet available.

Provisional data for 2011/12 shows that the percentage of LAC with 5 or more GCSEs grades A*-C including English and Maths has dipped dramatically since 2010/11; however there is good evidence for this dip. Of the cohort of LAC expected to achieve 5 GCSEs grades A*-C, 1 young person was moved back a school year due to a change in school (this was a positive move for this young person); and 3 of the young people had personal circumstances/challenges which meant that at the last minute they didn't achieve as expected – these circumstances and challenges could not have been anticipated.

| | Wiltshire | | | | | English average 2010/11 | South West average 2010/11 | Statistical neighbour average 2010/11 |
|---|---|---|---|---|---|---|---|---|
| | 2007/8 | 2008/9 | 2009/10 | 2010/11 | 2011/12 provisional | | | |
| % adopted during the year | 7% (10) | 17% (25) | 10% (15) | 11% (15) | 12% (19/154) | 11% | 12% | 10% |
| % health and dental checks | 87.9% | 85.3% | 80.0% | 93.1% (240/260) | 89% (234/295) | 83% | | 83% |
| % LAC with 5 or more GCSEs grades A*-C including English & Maths | 6.9% | 10.3% | 14% | 16% | 4% 1/5 | 13% | 12% | 11% |
| % sessions at school missed due to overall absence | Awaiting data | | | | | | | |
| % LAC persistent absence from school(academic Year) | Awaiting data | | | | | | | |
| % 10+ LAC for at least 12 months given a final warning/reprimand or convicted during the year | 11% | 10% | 12% | 4.8% | Collected at end of year | 7% | 9% | 7% |
| %Final warnings/reprimands and convictions of LAC | | | 7.2% | | Collected at end of year | | | |

### 3.6.3   Leaving care

The table below shows our performance around leaving care. The 2010/11 figures shows that we have a higher percentage of care leavers in suitable accommodation aged 19 when compared against the statistical neighbour, southwest and English average. 2011/12 comparative data is not yet available. Provisional 2011/12 data shows a decrease on 2010/11 although still close to achieving against our target.

2010/11 data shows that the percentage of care leavers who were in education, employment or training aged 19 was slightly less than the statistical neighbour, southwest and English average. Provisional 2011/12 data shows that there is more work to do in this area.

| Indicator | Wiltshire | | | | | Target (added if appropriate) | English average 2010/11 | South West average 2010/11 | Statistical neighbour Average 2010/11 |
|---|---|---|---|---|---|---|---|---|---|
| | 2007/8 | 2008/9 | 2009/10 | 2010/11 | 2011/12 provisional | | | | |
| Number eligible LAC 16-18 with pathway plans | | | | 96% 54/56 | 96.3% (80/83) | - | | | |
| % care leavers in suitable accommodation aged 19 | 100% | 81.8% | 76.5% (26/34) | 97.1% (34/35) | 94.7% (36/38) | 95% | 90% | 91% | 91% |
| % care leavers who were in ETE aged 19 | 84.4% | 54.5% | 41.2% (14/34) | 60% (21/35) | 39.5% (15/38) | 68% | 61% | 64% | 61% |
| Percentage LAC over 18 in higher education | | | | 7% (2yr avg) (12) | | | 6% | | |

# PART 2 - COMMISSIONING PRIORITIES

Part 2 of the Children in Care Commissioning Strategy outlines the commissioning priorities:

- INVOLVING CHILDREN AND YOUNG PEOPLE

- GOOD OUTCOMES FOR CHILDREN IN CARE
  Including safeguarding

- ACCESSING and MANAGING RESOURCES

- EDGE OF CARE

- PLACEMENTS

- LEAVING CARE

For each priority, we have set out what we want to achieve, messages from the consultation, priorities for action and key performance indicators which will be monitored by the Children in Care Commissioning Group. The priorities will be developed into an implementation plan which will include timescales and success criteria. The performance indicators for each priority will be combined into a performance report which will be used to monitor the progress of the strategy.

Please note that appendix 2 outlines the current position and achievements to date for each commissioning priority.

## 4. INVOLVING CHILDREN AND YOUNG PEOPLE

### 4.1 What we want to achieve
We want to maximise opportunities for children and young people in care to:
- Take part in shaping and developing services.
- Give feedback on existing services they are receiving.
- Have a say in their care plans ensuring that children and young people in care are and feel listened to, for example in reviews, and that their views are acted upon and help to shape their care plans.

### 4.2 Key messages from the consultation
During consultation on the draft strategy children and young people stressed the following:
- It is important for children in care to "make decisions about their own lives".
- Young people want to be listened to: "If they don't listen to you, they don't understand."
- Children and young people in care need to know what their rights are.

In focus group work with social care staff, the following were stressed as important:
- Valuing the life experiences of children and young people and ensuring their contribution to service development and delivery.
- Developing more creative ways of getting the views of all looked after children and young people.

### 4.3 Priorities for action

| | |
|---|---|
| 1 | Increase the number of children and young people who participate in the Children in Care Council. A Voice and Influence worker will be focusing on working with children in care to develop new ways to ensure that their voice is heard. |
| 2 | Undertake an annual survey of children in care which focuses on the Children in Care Promise and on whether children in care are being listened to. |
| 3 | Produce an annual report on the participation and involvement of children in care which includes examples of how service managers have responded to feedback and ideas and a summary of feedback from the survey. |
| 4 | Involve young people in an annual evaluation of the IRO service. |
| 5 | Review the Children's Rights service model, including looking at whether this service should be provided externally to the local authority in line with other advocacy services e.g. child protection advocacy and advocacy for children with disabilities. A new advocacy service will include the Independent Visitor scheme. |
| 6 | Launch the "young person's guide to living in care". |
| 7 | Review the use of viewpoint. |
| 8 | Following each Shared Guardianship session, a report on follow up areas is to be taken to the Children in Care Commissioning Group. |

**4.4    Key performance indicators which will be monitored by the Children in Care Commissioning Group:**

| Activity | Quality |
|---|---|
| • Number of children and young people who are involved in the Children in Care Council.<br>• Number of children and young people involved in consultation events.<br>• Increase in numbers accessing advocacy.<br>• Number of children and young people who are involved in the commissioning process. | • Percentage of children and young people contributing to their reviews.<br>• Children and young people in care state that they have been given an opportunity to give feedback on the support and services provided to them (annual survey).<br>• Children and young people say that they have been listened to (annual survey). |
| **Outcomes** ||
| • Managers can evidence where services have changed as a result of feedback from children and young people (annual report).<br>• Children and young people can identify positive outcomes related to their involvement (annual survey). ||

## 5. GOOD OUTCOMES FOR CHILDREN IN CARE including safeguarding

### 5.1 What we want to achieve

We want to achieve the best possible outcomes for children and young people by providing high quality services which focus on children's and young people's needs so that:

- Children and young people in care, on the edge of care and leaving care are safeguarded.
- Assessments and care plans are comprehensive and focus on outcomes.
- Reviews continue to happen on time.
- All looked after children and young people receive a consistently high quality service from all social care teams. This includes ensuring quality and robust assessment and planning ensured by challenge, managerial oversight and good decision-making.
- Criminal records for looked after young people continue to decrease in number.
- All looked after children and young people are supported towards a healthy future lifestyle.
- Looked after children and young people are supported to give them the best chance of achieving good educational attainment outcomes and leading successful and fulfilling lives.

### 5.2 Key message from the consultation

Young people were asked what they think the top things are that make a good social worker. In order of importance the responses were:

- Show they care and are willing to do all they can for you.
- Turns up to things when they are supposed to and don't cancel.
- They are understanding.
- They do the jobs and things they say they are going to do.
- You can contact them when you need to.
- Trustworthy.
- You feel you could go to them about anything.
- They are polite.
- Reliable.
- Dedicated to their job.

There were conflicting opinions on social workers, with some young people commenting that they felt theirs was really good:

> "He is just really good at his job"

And others were less satisfied:

> "My social worker doesn't do things when he says he will – he always says sorry I forgot!"

When this was discussed in the focus group a key issue that come up was trust and respect - not just with social workers, but all workers the young people engaged with. A very succinct response from one young person which was echoed by the group was:

> "'If they trust and respect you, you trust and respect them. If I am treated like s**t, I will act like s**t.'

Children and young people also emphasised that social workers should:
- Stick to appointments and where necessary go the extra mile to support them.
- Get to know the young person first before making judgements, not be too quick to make decisions and allow for the fact that young people change, mature and change their minds.

This was summed up by one member who said:

> "'They should get to know me first and then read my notes. I should be able to say things in my words."

Most had stories of being treated 'as a generic looked after young person' and when asked how this felt they stated:

> "When you aren't treated as an individual it makes you feel like you are someone else – not you."

Young people were asked to think how the lives of children and young people in care could be improved. The following are some of the responses in priority order:
- Have less staff changes i.e. try to make sure you have the same social worker or care worker for longer.
- More support for those who are not coping with school.
- Make sure that if children in care are being bullied it is dealt with quickly.
- Better training for staff on how to work with children and young people.

The discussion with the young people acknowledged the fact that some young people will not have any option other than to go into care, but the young people were very positive about the looked after children prevention services and felt that if a young person did need to leave their family, they should be in as stable a placement as possible, as quickly as possible.

## 5.3     Priorities for action

| |
|---|
| 1     To ensure that children in care receive consistent high quality social work services.<br>• Ensure that initial and core assessments take sufficient account of the impact of children's earlier life experiences (chronologies), family history (genogram) and of children's identity in terms of culture and race.<br>• Review allocations of looked after children and young people across teams and consider whether it is appropriate for some to move sooner to the through care teams.<br>• Develop staff training which involves children and young people in care and addresses approaches and techniques for working with young people.<br>• Ensure access to managerial supervision for all staff across health and social care ensuring that workers receive regular supervision, challenge and reflection.<br>• Ensure systems in place for promoting good practice such as opportunities for case work discussions and peer audits.<br>• Follow up on taking part in a benchmarking exercise with South West Audit Partnership to gauge average workloads for Social Workers across the South West.<br><br>2     To improve health outcomes.<br>• The Public Health Team to appoint a designated doctor and designated nurse for looked after children to ensure effective strategic clinical leadership in line with statutory national guidance as set out in *Working Together to Safeguard Children*, 2010. |

- Improve LAC health service delivery and consider how to use the NICE public health guidance "Promoting the quality of life for looked-after children and young people".
- Ensure that the looked after children's health team receive prompt notification of a child or young person's admission to care or change of placement.
- Improve the quality, timeliness and take-up of initial health assessments and review health assessments including for children and young people placed outside Wiltshire.
- Collect data on the numbers of looked after young women who are pregnant, or who are teenage mothers and looked after young men who are, or who are about to become, fathers.
- Ensure that the needs of young mothers and fathers within the looked after children service, including those who are placed outside the area, are identified and addressed.
- Ensure that health support to looked after children and care leavers is fully developed in partnership with the Children in Care Council.
- Monitor the sharing of SDQs with looked after children nurses as part of the ability of the looked after children health team to fully quality assure health service delivery.
- Work with health colleagues to ensure that health plans for looked after children and young people are outcome focused.
- Improve leaving care transitions so that young people can continue to obtain health advice and services (physical and mental health) and so that pathway planning includes health and access to positive activities. This includes ensuring that care leavers receive copies of their health histories.
- Monitor the impact of the Specialist CAMHS service on achieving quality outcomes for children in care.
- From April 2012, strengths and difficulties questionnaires (SDQs) will be routinely shared with the looked after children nurses to fully quality assure health service delivery and assist with tracking a young person's emotional growth and development at the time of their annual health review.

3    To improve educational attainment.
- Improve the monitoring of looked after young people aged 16+ and moving into education, employment and training.
- Provide more support with schooling for those who struggle with this.
- Monitor development of the Aspire Centre which will provide a dedicated resource and activities centre for looked after children including monitoring associated costs.
- Improve attendance.

4    To quality assure practice.
- Ensure regular reports from the IRO service to the Children in Care Commissioning group to identify key themes and improve practice. This includes ensuring that IROs systematically gather and analyse information.
- Work with the Public Health Team to ensure that looked after children's health service delivery is subject to a work plan with measurable objectives and a rigorous performance management framework.
- Develop a process for coordination between looked after children and young people's statutory reviews and annual health reviews to identify themes or trends and inform future service provision.
- Put in place an effective quality assurance framework of assessment and case management practice for children in care.

### 5.4 Key performance indicators which will be monitored by the Children in Care Commissioning Group

| Activity | Quality |
|---|---|
| • Number and % of LAC receiving health and dental checks.<br>• Number and % of eligible LAC with pathway plans. | • Number and % of LAC placed close to home.<br>• LAC self-reporting quality of life.<br>• LAC self-reporting high level of wellbeing.<br>• LAC Reviews happen on time.<br>• Number and % of LAC allocated to qualified social workers.<br>• % statutory visits to children in care within the timescale.<br>• Number and % of sessions at school missed due to overall absence.<br>• Number and % of LAC persistent absence from school. |
| **Outcomes** | **Cost effectiveness** |
| • Immunisation rates for children in care compared with the Wiltshire population.<br>• % LAC with KS2 L4+ English.<br>• % LAC with KS2 L4+ Maths.<br>• % LAC with 5 or more GCSEs grades A*-C including English and Maths.<br>• Number LAC teenage pregnancies.<br>• % 10+ LAC for at least 12 months given a final warning/reprimand or convicted during the year. | • Costs associated with the Aspire Centre. |

# 6.    ACCESSING and MANAGING RESOURCES

## 6.1    What we want to achieve
We want to develop efficient and responsive processes which:
- Enable children and young people to quickly access the services required.
- Monitor the quality and effectiveness of these services in achieving change and positive outcomes.
- Are multi-agency to ensure a team around the child approach.

## 6.2    Key message from the consultation
Comments on access to resources made during the consultation included the following:
- It is important to undertake more analysis and to be able to predict future demand for services and placements.
- There is scope to involve other agencies in the Placement Panel.
- Benefits could be gained by extending the remit of the children's services buyers.

## 6.3    Priorities for action

| | |
|---|---|
| 1 | Extend the role of the Buyers service to cover referrals to the in-house foster care service. This was recommended in the initial placements strategy and is a model which is successful in other local authorities. Potential benefits include the following:<br>• Consistent high quality management information about supply and demand for the whole foster care market. This information is essential to the Sufficiency Duty.<br>• More efficient business processes, such as consistent administrative processes for managing referrals, contracting and payments.<br>• Creates a level playing field between in-house and external providers.<br>• A higher quality in-house service with more foster carers. This will enable the in-house fostering service to focus on recruitment and support to foster carers.<br>• Making sure the right people are doing the right things with role clarity e.g. buyers commission, monitor and report, whilst social workers undertake assessments and care planning, and the family placement (fostering) team recruit and support foster carers and match the skills of foster carers with the needs of the child and young person.<br>It is important to note that care professionals will retain decisions on the selection of placements. |
| 2 | Improve access to resources:<br>• Create a new Access to Resources process. This process has been referred to in section 3.2.3 on the Complex Families Project.<br>• Consider extending the role of the Placements Panel. This will include considering whether the panel will become multi-agency with a focus on placements and permanency. In the future no cases will go to the Placements Panel unless they have gone through the Gateway Panel to explore options for supporting the child or young person remaining at home. |
| 3 | Carry out further work on identifying expenditure and full costs. This includes having a better understanding about full costs including the costs of specialist LAC nurses, medical assessment costs, health costs of children placed out of area, CAMHS LAC costs. |
| 4 | Complete a case file analysis of the 20 most expensive placements and the 20 looked after children and young people who have had the most moves. |

| | |
|---|---|
| 5 | Produce an in-depth needs assessment which estimates short term and long term demand for services and improved forward planning on placements. This will include the estimated number of new LAC placements which will start in the next 3 years i.e. the number, types and costs of placement we might expect. |
| 6 | Set up systems for ensuring individual needs and care plans are informing the strategic commissioning process. |
| 7 | Produce in year and longer term budgets which reflect placement plans and anticipated demand for placements. |
| 8 | Ensure value for money from expenditure on transport for looked after children. |
| 9 | Further explore opportunities for joint commissioning with partners, particularly health. |
| 10 | Review the need for, access to, and use of emergency foster care placements. |

## 6.4 Key performance indicators which will be monitored by the Children in Care Commissioning Group

| Activity | Quality |
|---|---|
| • Number of children and young people referred to the Access to Resources process each month.<br>• Number of children referred to the Placement and Permanency Panel each month.<br>• Number and % of LAC in in-house foster placements.<br>• % worked with by LAC prevention services who do not enter the care system.<br>• % worked with by LAC prevention services who return home. | • Number and percentage of children and young people who have received a service via the Access to Resources process who are then referred to the Placement and Permanency Panel.<br>• Feedback from children and young people and parents on services received (feedback surveys). |
| **Outcomes** | **Cost effectiveness** |
| • Reduced number of looked after children starting to be looked after in the year (i.e. more children and young people supported to live at home with their families).<br>• Increase in children and young people who return home in 6 weeks or less. | • Average gross weekly cost per LAC in residential care.<br>• Average weekly unit cost of independent fostering agency.<br>• Average weekly unit cost of in-house foster placements.<br>• Reduction in expenditure on LAC placements, internal and external) from 2013/14. |

## 7.    EDGE OF CARE

*NB. A detailed report was produced in February 2012 on Edge of Care: summary of services. This has informed this section of the commissioning strategy. The full Edge of Care report is available from lucy.kitchener@wiltshire.gov.uk*

### 7.1    What we want to achieve

We want to achieve a good range of cost effective 'edge of care' services which promote good outcomes by enabling children and young people to remain living safely with their families, where appropriate. These services:

- Assist families and extended families to better care for and support children and young people.
- Provide direct support to children and young people increasing self esteem and promoting resilience.

Where children do return home after a period of care, the risks will be assessed and support provided if required.

In 2011 Ofsted produced the "Edging Away from Care" report which outlines how services in 11 local authorities helped change the lives of children and young people at risk of entering care for the better. Services and approaches highlighted by Ofsted included the following:

- Good range of intervention services. It is helpful if services are following a clearly defined and understood intervention model. No one model is 'best'. The clarity is important. Models and approaches mentioned included solution based or cognitive behavioural approaches, multi-systemic therapy, motivational interviewing and family group conferencing.
- Clear referral and access to services pathways including edge of care panels or similar.
- Holistic assessments which identify and manage risk and set clear goals for what needs to change. Positive strengths based approaches which involve the children, young people and families in identifying solutions are successful.
- Good multi-agency working.
- Robust strategic analysis and understanding of the needs of this cohort of children, young people and families.

### 7.2    Key message from the consultation

Young people highlighted the following:

- When abuse is occurring social workers should intervene early.
- The importance of more methods and services which provide support for families to prevent young people coming into care.
- Young people know that it is not always possible to prevent a young person entering care but where possible families should be given support before things start to go wrong.

Other points noted on edge of care included:

- Services being available outside normal working hours.
- Taking a multi-agency team around the child approach.
- Short breaks available for families with children and young people with disabilities.
- Some good work taking place on supporting children to remain with families for example work undertaken by the Crisis Intervention Service and Family Support Team.
- A need for robust transitions and support programmes for children and young people moving home between placements.

Wiltshire has recently prioritised this area with the development of resource centres, implementation of the Family and Parenting Support Commissioning Strategy and the Social Care Family Support review.

## 7.3 Priorities for action

| | |
|---|---|
| 1 | Close monitoring of the impact of "edge of care" services through the access to resources process to include<br>• Detailed analysis of reasons why children become looked after.<br>• Reviewing what is offered to support reunification.<br>• Ensuring a comprehensive package of support and ongoing monitoring to sustain quality of care is offered. |
| 2 | Develop a business case for developing Support Foster Care or a similar model. This is a purposeful model where short breaks are part of a programme over a limited period of time as an intervention to effect change including planned time out. |
| 3 | Review the family and friend's policy/procedure. |
| 4 | Complete an analysis of the need for out of hours support including a detailed analysis of all children and young people who come into care out of hours. |
| 5 | Monitor the impact of the Specialist CAMHS service on preventing children and young people becoming looked after and enabling a return home. |
| 6 | Establish a referral mechanism between social care staff and Project Inspire to intervene early with young people who drop out of post-16 learning and quickly move them back to EET. |
| 7 | Close monitoring of the impact of the Wiltshire Risk Management Panel. |

## 7.4 Key performance indicators which will be monitored by the Children in Care Commissioning Group

| Activity | Quality |
|---|---|
| • Number and percentage of children and young people in kinship placements – not looked after.<br>• Number of private fostering arrangements notified.<br>• Number of children and young people who cease to be looked after.<br>• Number of Special Guardianship Orders. | • Positive feedback from children and young people and parents on services received.<br>• Reduction in use of emergency placements. |
| **Outcomes** | **Cost effectiveness** |
| • Increase in children and young people who return home in 6 weeks or less.<br>• Increase in children and young people worked with by 'edge of care' services who remain living at home 6 months after receiving a service. | • Shift in expenditure from placements budget to prevention/family support budget. |

## 8. PLACEMENTS

### 8.1 What we want to achieve
We want to achieve a good range of placements within a purchasing framework focusing on:
- Choice.
- Quality (both of placement and of relationship with carer).
- Cost effectiveness.
- Meeting an individual's needs, as close to home as possible (providing that is compatible with the care plan) and close to the education setting.
- Flexibility.
- Short-term crisis provision when needed.

We also want to achieve the following:
- More timely adoptions.
- A decrease in the number of moves a looked after young person has to make.
- Improved longer-term stability of placements.
- Young people who are happy in their placements.
- To find young people a permanent family where possible.
- Foster carers have all relevant, up to date information to assist them with providing good quality safe care personal to the child or young person's needs.

### 8.2 Key message from the consultation
The key issues for children and young people in priority order were:
- Stop children and young people needing to move from place to place – find a place where they feel comfortable and can stay.
- Allow children and young people to be involved in their choice of placements, have a say in their care plans etc.
- Place brothers and sisters together, or where this is not possible making sure they are able to have contact.
- Provide support before placements start going wrong.
- Have less staff changes i.e. try to make sure you have the same social worker or care worker for longer.
- More adoptions and make adoptions faster.
- More mother and baby placements.

During consultation, social care staff and foster carers stressed the importance of the following:
- Increasing demand for highly skilled short break carers for children and young people with disabilities.
- Concerns around transitions to independence.
- The need for a specific assessment process in place for children and young people with complex disabilities and the need to place for permanence.
- Need for well resourced family-based short breaks for children and young people with disabilities.
- Use of a person centred approach for individual outcomes.

Consultation with foster carers identified a number of positives:
- The support foster carers get is good and includes refreshments and crèche facilities at meetings.

- Training is helpful.
- Foster Carer meetings are very helpful.
- Emergency Duty Service is a good, responsive service and has sorted problems quickly.

## 8.3    Priorities for action

1    Foster placements
- Develop a specification for the in-house foster care service. The specification will cover the following:
  - Training.
  - Role of foster carers including expectation regarding promoting good health.
  - The number and type of foster carers required to meet the anticipated ages and needs of children and young people.
  - Standards and targets expected. For example in terms of placement stability, promoting health and wellbeing of looked after children and achieving best possible education attainment; risk assessment undertaken by the child's social worker; and support to carers regarding statutory visits.
  - Review of skills fees criteria.
  - Quality assurance.
  - Compliance against regulatory requirements to safeguard children and young people.
- Update the recruitment strategy which will outline how targets for in-house capacity will be delivered once the specification has been agreed for the fostering service.
- Develop a Foster Care review form.

2    Adoption
- Achieve better timeliness in days between the date a child becomes LAC and the decision that a child should be placed for adoption by:
  - Signing off and implementing the Permanency Policy.
  - Rolling out training to all social care staff including IROs on planning for permanency.
  - Appointing a dedicated "home finder" within the adoption service who will attend at 2nd LAC review.
  - IROs taking ownership of tracking children and questioning Permanence planning at 2nd LAC review.
  - Developing an Adopter's Reference Group.
- Develop a specification for the Adoption Service. The specification will address central Government changes to the adoption assessment process and include arrangements for close monitoring of adoption timescales.
- Develop an Adoption Service Plan. An Adoption Improvement Plan has been developed following the publication of the Adoption Scorecard and the Adoption Diagnostic Assessment pilot in May 2012. A set of Performance Indicators will be developed to show progress against the plan and progress will be monitored by the Children in Care Commissioning group.
- Review services available to assist when problems with adoptive placements first arise including the availability of therapeutic support. This will include reviewing the small adoption support contract with PACT.

| 3 | Looked after children and young people with disabilities |
|---|---|
| | • Ensure every child and young person with disabilities has a person-centred plan against which outcomes can be measured. |
| | • Establish how vulnerable looked after children and young people with disabilities are supported to ensure a single plan and assessment works for them as part of the DCA Pathfinder. |
| | • Better support parents and carers early on to prevent children and young people with complex needs from becoming looked after, where there are no safeguarding or child protection concerns. |
| | • Develop appropriate specialist short break provision for children and young people with autism and complex needs to reduce reliance on independent special schools. |
| | • Ensure sufficient carers who are confident to care for children and young people with a wide range of disabilities, both in planned and emergency situations. |
| | • Improve outcomes and value for money for those with greatest needs associated with autism. |
| | |
| 4 | Placement stability |
| | • Improve support, advice and services for families, carers and young people around managing difficult behaviour to prevent placement breakdown, particularly with reference to adolescent challenging behaviour. |
| | • Ensure there are in-house foster carers who can meet a range of needs so that better 'matching' can take place. |
| | |
| 5 | Quality Assurance of placements |
| | • Develop a systematic approach to ensure placement quality against outcomes and use to inform future placements. |
| | • Monitor implementation of the permanency policy. |

### 8.4 Key performance indicators which will be monitored by the Children in Care Commissioning Group

| Activity | Quality |
|---|---|
| <ul><li>Number of LAC and LAC rate per 10,000.</li><li>Number who started to be LAC and rate per 10,000.</li><li>Number who ceased to be LAC and rate per 10,000.</li><li>Number and % placed for adoption.</li><li>Number and % of Section 20 placements.</li><li>Number and % of foster placements.</li><li>Number and % of residential placements.</li><li>Number and % who access short breaks.</li><li>Number and % with family and friends.</li><li>Number and % of person centred reviews that take place in Wiltshire.</li><li>Number and % who receive advocacy.</li><li>Number of Emergency Protection Orders.</li><li>Number of Police Protection Orders.</li></ul> | <ul><li>Average time between a child entering care and moving in with its adoptive family, for children who have been adopted (days) (Indicator A1).</li><li>Average time between a local authority receiving court authority to place a child and the local authority deciding on a match to an adoptive family (days) (Indicator A2)</li><li>Number and % adopted within 12 months.</li><li>Parents/carers continue to rate the Wiltshire Short Breaks programme as excellent.</li><li>Number of LAC with 3+ placements during the year.</li><li>Long term stability.</li><li>% LAC placed for at least 2.5 years in the same placement for at least 2 years.</li><li>% LAC placed over 20 miles from where they used to live.</li></ul> |
| **Outcomes** | **Cost effectiveness** |
| <ul><li>Emotional wellbeing of looked after children.</li><li>Reduction in number of children and young people with disabilities placed out of county pre- and post-16</li></ul> | <ul><li>Post-16 placements.</li></ul> |

## 9.    LEAVING CARE

### 9.1    What we want to achieve
To support good outcomes by focusing on:
- Effective preparation for independent living.
- Preventing homelessness.
- Ensuring a good range of accommodation for 16 to 24 years olds who are vulnerable and have specific housing needs.

### 9.2    Key message from the consultation
30% of young people who attended the focus group discussion thought that better support and advice for children and young people when moving school, placements, into after care, employment etc., would improve their lives.

Smoother transition to after-care/through-care was also identified as something that was missing from the strategy during the focus group session.

### 9.3    Priorities for action

| | |
|---|---|
| 1 | Further work on securing a good range of accommodation options through the development of a 16+ Accommodation Strategy. This includes mapping the leaving care market. |
| 2 | Improve attainment and reduce the number of children in care and care leavers who are NEET. This includes continuing the development of apprenticeship opportunities for care leavers. |
| 3 | Routinely report details of pathways plans as part of a systematic review process ensuring information is recorded; SMART objectives are set, the young person's voice is recorded and multi-agency participation is encouraged. |
| 4 | Develop Leaving Care procedures, linked to the Fostering Development Plan. |
| 5 | Continue the development of a mentoring programme for care leavers who are in education, employment or training. |

## 9.4 Key performance indicators which will be monitored by the Children in Care Commissioning Group

| Activity | Quality |
|---|---|
| <ul><li>Reduction in 16 - 24 year olds presenting as homeless.</li><li>Reduction in homeless acceptances of 16-24 year olds.</li><li>Reduction in number of young people aged 16+ becoming looked after.</li><li>Reduction of babies becoming looked after through use of mother and baby placements where appropriate.</li><li>Number of LAC 16+ with pathway plans.</li><li>Number and % of LAC over 16 NEET.</li><li>% of young people looked after in 17th year who were in ETE aged 19.</li><li>% of care leavers in suitable accommodation.</li><li>Number LAC in higher education.</li><li>% ALC aged 19 in higher education.</li></ul> | <ul><li>Reduction in out of authority placements.</li><li>Maintenance of tenancies.</li><li>Satisfaction of service users including those living in supported accommodation (qualitative indicator).</li><li>Young people agree accommodation is suitable and meets needs.</li><li>Young people are satisfied with the accommodation process and outcome of intervention.</li><li>Children in Care and Care Leaver's success in EET in line with their peers.</li></ul> |
| **Outcomes** | **Cost effectiveness** |
| <ul><li>Number of young people re-presenting as homeless.</li><li>Number of young people remaining at home or returning home following intervention and prevention.</li><li>Number of children in care/care leavers who are EET.</li><li>Reduction in accommodation breakdowns.</li><li>Number of successful move-ons.</li><li>Number of care leavers in suitable accommodation.</li></ul> | <ul><li>Reduce in spend on LAC 16+.</li><li>Average cost per 16+.</li><li>Time in service.</li></ul> |

## Appendix 1     Terms of Reference of Children in Care Commissioning Group

NB. It has been agreed that the terms of reference will be kept under review.

**Purpose of the Children in Care Commissioning Group**
To improve outcomes for children and young people in care by ensuring there are robust commissioning arrangements.

The Children in Care Commissioning Group will take an overview on the commissioning and planning of all aspects of services for children in care. This will include social care, education, health and services which prevent children and young people from entering the care system and assist with a return home.

**Objectives**
1. To co-ordinate and monitor the work of key children in care commissioning, planning and development groups. This will include making sure governance arrangements are clear, there is no overlap between the roles and responsibilities of different groups and that children and young people participate in the commissioning process.
2. To develop and co-ordinate implementation of the Children in Care Commissioning Strategy. The Children in Care Commissioning Strategy will be reviewed and updated annually.
3. To ensure project plans are in place for key developments and to monitor implementation of project plans.
4. To take a strategic overview of children in care commissioning budgets including monitoring planned shifts in expenditure.
5. To ensure an appropriate supply of high quality placements and ensure statutory requirements and the needs of young people are met. This includes addressing equality and diversity issues.
6. To ensure services procured through the commissioning strategy are improving outcomes for children and young people in care.
7. To ensure children and young people are involved in developing, monitoring and updating the Children in Care Commissioning Strategy.

**Membership**

| | |
|---|---|
| Julia Cramp | Chair, Service Director Commissioning and Performance |
| Tbc | Service Director Children's Social Care |
| Lin Hitchman | Head of Children in Care |
| Terence Herbert | Head of Service – Community Safeguarding |
| Karen Reid | Virtual Headteacher |
| Yvonne Taylor | Divisional Director Children and Families Services Oxford Health Foundation Trust |
| Alison Bell | Consultant in Public Health |
| Blair Keltie | YOS Operations Manager |
| Karina Kulawick | Central SEN Services Manager |
| Tom Smith | Head Procurement and Contracts Unit |
| Angie Rawlins | Head of Housing Options |
| Marie Taylor | Finance |
| Tbc | Voluntary sector representative |
| Lucy Kitchener | Lead Commissioner (responsible for managing work programme of the group) |

## Appendix 2        Commissioning priorities: current position and achievements to date

### 1.        Involving children and young people: Current position and achievements to date

The Children in Care Council have developed a Children in Care Promise. This is outlined below:

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**CHILDREN IN CARE COUNCIL PROMISE**

Being in Care
- A choice of when to move on from care.
- To try not to separate brothers and sisters (however, if this is not possible, try to ensure brother's and sister's placements are close together and allow contact).
- To allow looked after children and young people to be involved in the choice of their placement from the start.
- To find a place where you feel comfortable and 'at home' and can stay until the end of your time in care.

Listening to Looked After Children and Young People
- To listen to your views and act on them.
- To provide a social worker you can rely on who keeps to meetings, gives clear information, is honest and responds when needed.
- Make looked after children and young people aware of their rights and to train others in the rights of looked after children and young people.
- To ensure that young people are involved in the creation and regular review of all care plans.

Support
- Better help getting into school whatever has happened.
- To provide support so looked after children and young people can see their family (i.e. transport).
- To use reliable transport for young people.
- To organise group activities for young people in care and those leaving care.
- That if bullying arises for any looked after child or young person it will be dealt with quickly and efficiently.
- To support young people in care to find training, education or a job that suits them when they leave school.

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Other achievements on participation and involvement of children and young people in care include:
- The 2012 Ofsted inspection of safeguarding and looked after children noted that the **overall effectiveness for looked after children, young people and care leavers was adequate and capacity to improve was good**. One aspect was graded as "outstanding": making a positive contribution, including user engagement. The recommendations made by Ofsted have been included in the Commissioning Priorities.
- There is an active **Children in Care Council** (CiCC) which meets monthly. Subgroups also meet around specific events or pieces of work. There is a membership of around 20 young people for the CiCC, with regular attendance at each meeting of between 7-12 people. The CiCC have fed their views into a broad number of consultations and strategies including the Children in Care Commissioning Strategy, the 16-24 Accommodation Strategy, the 11-19 Commissioning Strategy and the Wiltshire Participation and Involvement Strategy.

- The **Wiltshire Corporate Parenting Panel** (CPP) has worked hard with young people to develop a format that is accessible for young people to share topics and issues that are important to them. This has led to the development of the **Shared Guardians Session** which takes place after each CPP meeting and is co-ordinated by the Virtual Head Teacher. The agenda for the Shared Guardians Session comes from the young people and the session is led by the young people. Following each session an action plan and a task and finish group is developed to take forward issues from the session. So far topics have included looked after young people's relationship with the police, sibling contact, leaving care and a review of the Children in Care Pledge. Feedback from these sessions has been very positive from both young people and elected members.
- The **Children's Rights Service** provides advocacy and participation activities for looked after children and young people, those leaving care and young people wishing to make a complaint under the Children Act 1989 section 24D and 26. On average the Children's Rights Officer has 15 individual contacts with young people per month. The majority of advocacy issues are resolved locally with a social worker.  A leaflet for children and young people -"Have your say" - for complaints that fall under statutory Children Act procedures and relate to children's social care has been produced and distributed.
- **Independent Visitor Scheme.** Being an independent visitor is an unpaid voluntary role which involves visiting a young person on a regular basis and building a long-term relationship with them throughout the time they are in care. The Children Act 1989 requires that all looked after young people who have minimal contact with their families, should be offered the support of an independent visitor. There has been a continuing upward trend in referrals to the scheme. As at May 2011 the independent visitor's scheme had 27 actively matched young people. This is the largest number since the scheme began in 2000. The referral rate currently exceeds the rate of independent visitor match closures, with a result that the numbers of matches increase year on year.
- The 2012 Ofsted inspection of safeguarding and looked after children noted that most looked after children and young people had **confidence in their Independent Reviewing Officers** and understood their role.
- The Independent Reviewing Officers use **Viewpoint**, an online software package, to gather young people's views for reviews. This is currently being reviewed with the Voice and Influence team and young people.
- 70 young people were involved in the **consultation on the Children in Care Commissioning Strategy** through focus group work, one to one interviews and a paper based snap survey that was sent to every looked after young person in Wiltshire over 7 years old. The findings of this work have informed the CIC commissioning strategy. Key messages about the role of the social worker are also being distributed directly to every social work team in the county to help to improve practice.
- Young people were involved in **developing the Towpath House provision**. This included involvement in the design of the premises and the service specification.
- Wiltshire is currently developing a **foster care review form** and has been consulting with young people to ensure the form is 'fit for use'.
- The Children in Care Council and a number of other looked after young people have been involved in producing an **'Introduction to care DVD'**, talking about their experiences of living in foster care and residential care. Professionals also appear on the DVD describing their role with young people in care. There is a file of facts diary with written information and contact details and an interactive website which have also been designed with young people.
- There are two annual **'STAR' (Successful Talented Achiever Recognition) achievement award events** for looked after children each year: one for children and one for young

people. At these events Wiltshire celebrate the achievements of their looked after young people.

- Improved **Shared Guardianship** which includes looked after children and young people attending all corporate parenting board meetings.

## 2. Good outcomes for children in care including safeguarding: Current position and achievements to date

- Improvements have been made in the completion of **Personal Education Plans and of Pathway Plans** for care leavers.
- The new **Specialist CAMHS** service started on 1st April 2011. The service includes an **Outreach Service for Children and Adolescents (OSCA)**. The primary role of OSCA is to work intensively with children in care and with children and young people experiencing a complex range of behavioural, emotional and mental health needs to prevent escalation of at risk behaviours, and to work towards recovery. OSCA also provides support to the LAC teams for 2 ½ hours per month to help LAC teams think through how they are effectively supporting children and young people. Foster carers can attend these consultations with their Social Workers.
- The CAMHS services also includes a new **Family Assessment and Safeguarding Service (FASS)**.The overall aim is to reduce the consequences of child maltreatment and neglect through providing specialist mental health assessment and treatment, contributing to the safeguarding of children and young people. FASS works with families with children of all ages, 0-18. This service will also assist with enabling children to remain at home working with their families. FASS accepts referrals from social care and health services.
- There has been a slight improvement in the timeliness of uptake of the **Review Health Assessments** (88.34% in 2011/12 compared to 87% in 2010/11).
- The 2009 quality assurance report from the IRO service identified poor performance in relation to **statutory visits** with 42% compliance. New practice guidance and procedures have been produced and compliance monitored via the IRO QA and reported to SMT each quarter. C**ompliance is now 96% in the Children in Care teams.** This remains variable in the Community Safeguarding Teams who hold responsibility for some children in care. Reflective audits notes good practice in recording of statutory visits.
- There have been no permanent exclusions of looked after children and young people for the last 3 years. **Virtual Schools Officers** work closely with schools on bespoke packages and alternative programmes tailor-made to suit individual children and young people. Virtual Schools Officers carry out integrated working with SEN and Behaviour Support as well as other agencies. **Personal Education Plans** (PEPs) have recently been revised and young people consulted with about a possible post-16 PEP. PEPs reflect the individual needs of a child.
- The **Aspire Centre** to deliver a range of accredited formal educational programmes has now been approved by Full Council and is due to open in September 2012.

## 3 Accessing and managing resources: Current position and achievements to date

- 2 **Placement Panels** are in place. Panels are chaired by the Head of Children in Care in order to ensure consistent decision making.
- Two **'buyers' posts** are based in the Children's Services Procurement and Contracts Team. These posts were initially funded through the Wiltshire Council 'spend to save' scheme. If a placement is required from an external provider the buyers will source this

placement and manage the contractual process. The decision on the suitability of the placement remains with social work teams. Achievements to date include:
- o Savings of £184,707 achieved in 2011/12.
- o Contracts are in place for all placements with external providers.
- o Positive feedback has been received from providers on the value of having a single point of contact.
- o The buyers are developing good market knowledge.
- o The buyers take into account cultural and diversity needs in their search for placements.
- A **Market Position Statement** (MPS) for children in care has been produced. The intention is to share this with partners and keep it updated. The MPS is aimed at existing and potential providers of services to Wiltshire's children in care and children on the edge of care. The document compliments this Commissioning Strategy showing how the Council directly and through independent providers seeks to meet the needs of these children and young people and to ensure the Council is able to access sufficient accommodation for looked after children.
- The **Complex Families Project** has been established. The project includes identifying more effective ways of accessing targeted resources and tracking the impact of services.

The tables below compare the average gross weekly costs of the three main types of placement of looked after children. Information from other authorities to use as a comparison has been obtained from the CIPFA benchmarking group. CIPFA social care benchmarking clubs help authorities share data. Membership of this group is voluntary. 66 Councils are members of the 2010 group. For 2009/10, Wiltshire's average unit costs are in line with the average benchmarking unit costs, 1% higher on residential and 2% lower in fostering.

| Indicator based on the PSS EX1 national statistical return (not collected since 2010) | Wiltshire | | | | | |
|---|---|---|---|---|---|---|
| | 2006/7 | 2007/8 | 2008/9 | 2009/10 | 2010/11 | Estimate 2011/12 |
| Average gross weekly expenditure per LAC in residential care | £2,800 | £3,080 | £2,658 | £2,817 | no longer collected | no longer collected |
| Average weekly unit cost of independent fostering agency | £665 | £815 | £935 | £869 | no longer collected | no longer collected |
| Average weekly unit cost of in-house foster placements | £568 | £495 | £459 | £425 | no longer collected | no longer collected |

| Indicator based on the s.251 Government return (collected since 2010) | Wiltshire | | | | | | Average Benchmarking Club members | |
|---|---|---|---|---|---|---|---|---|
| | 2006/7 | 2007/8 | 2008/9 | 2009/10 | 2010/11 | Estimate 2011/12 | 2010/11 | Estimate 2011/12 |
| Average gross weekly expenditure per LAC in residential care | - | - | - | - | £1,919 | £2,094 | £2,786 | £2,832 |
| Average weekly unit cost of independent fostering agency | - | - | - | - | £850 | £804 | £884 | £849 |
| Average weekly unit cost of in-house foster placements | - | - | - | - | £434 | £406 | £434 | £424 |

## 4 Edge of care: Current position and achievements to date

- All **edge of care services have been mapped** and a summary produced of the resources we have in Wiltshire which assist with preventing children and young people from becoming looked after and also assist with preventing any returns to care after a child or young person has gone to live back at home. The summary includes information on services and current arrangements/orders. Services include:
  - o The Family Link scheme.
  - o "Kinship" or Family and Friends care.
  - o *Motiv8* Substance misuse/harm reduction service working with tier 2 and 3 offenders.
  - o *ROBLAC* (Reducing Offending Behaviour in Looked after Children).
  - o Special Guardianship (SGOs).
- **Investment in edge of care services** has been increased through the Early Intervention Grant. This includes re-commissioning the following:
  - o A number of family support services provided by the voluntary sector ended on 31.03.12. A new family support service which will work with families with complex needs who do not quite meet social care thresholds started on 01.04.12.
  - o The social care family support service was reviewed in 2011. A specification for a new intensive family intervention service is being developed.
  - o The Family Group Conferencing service purchased from the voluntary sector.

  This work involved a range of agencies. Parents were involved in the tendering process for the new service purchased from the voluntary sector and in the review of Wiltshire Council's social care family support service.
- There has been an **increase in requests for carers who can provide care to babies alongside one or both parents**. These arrangements are usually short-term and could include parenting assessments for court proceedings. The placements are intensive and foster carers will need good communication skills and the confidence to assess parenting potential. Enhanced fees are payable to carers with skills to provide these placements. Where this is successful, it keeps the parent(s) together with their child and may remove any need for the child to become looked after.
- There is a **specialist private fostering Social Worker** based in the Fostering Service. Notifications and compliance with timescales for completion of private fostering

assessments and Regulation 8 monitoring visits have increased significantly since this appointment:
  - 2008-2009, 3 arrangements.
  - 2009-2010, 1 arrangement.
  - 2010-2011, 8 arrangements.
  - January 2012, 7 current arrangements.

Notifications:
  - April 2010-March 2011, 8 notifications.
  - April 2011-January 2012, 20 notifications.

Of the 7 current arrangements, 6 assessments have been completed and 1 assessment is in process. Regulation 8 (monitoring visits) are being undertaken within required timescales.

- **Project Inspire** provides a range of interconnected services to vulnerable young people in Wiltshire who need assistance getting back into education, employment or training (EET). The project helps to divert young people away from crime, and provides support for vulnerable groups including children in care and care leavers, helping them to achieve their full potential. To date (October 2011), the project has supported 255 young people. 78% gained accreditation. 68% moved into education, employment or training. 17 of the 255 young people were children in care/care leavers and the project provided an average of 10 days worth of support to each of these individuals. Following evaluation of the project and its outcomes, Wiltshire Council has committed a grant of £20,000 to continue the project for the next financial year 2012/2013.

- Towards the end of 2011 a **detailed audit was undertaken of a sample of cases where children and young people started to be looked after during the period 1st December 2010 to 30th June 2011.** The detailed analysis focused on 2 cohorts where the largest number of children and young people became looked after during this period: 13 to 17 year olds and under 5 year olds. The analysis noted that there were opportunities for diverting some young people from the care system. The findings from the audit informed and will continue to inform the development of the Complex Families Project. The findings also influenced the development of the new service model and service specification for the social care intensive family support service.

- In 2011 an **audit was undertaken of 40 cases where children were placed under Section 20 of the Children Act**. This audit also noted opportunities for earlier intervention. Recommendations have informed the specification for the new social care intensive intervention service.

- There has been substantial investment in **3 family Resource Centres** in Wiltshire (Devizes, Trowbridge and Salisbury). The Resource Centres provide space for:
  - All contact for looked after children and their families.
  - Community-based intensive interventions.
  - Complex community based parenting assessments/court assessments.
  - The Crisis Intervention Service.

- A **joint protocol between Social Care and Housing** has been established for assessment and appropriate placements of young people aged 16 and 17 who present as homeless and in need by the Housing Liaison Group. This is aligned to the Host Family Scheme which helps young people aged 16/17 find temporary emergency housing if they are at risk of being homeless. It is usually for a maximum of 3 weeks whilst support staff help the family to resolve issues so the young person can return home or move to a permanent address. There are 13 approved Host Family carers. From 1st January to 31st December 2011, there were 33 referrals to the Host Family Scheme. During this period 5

young people returned home. Since the implementation of the joint housing protocol, there have been no young people identified as intentionally homeless.

- **Wiltshire Risk Management Panel** now works with individual young people who are engaged in risky behaviour or otherwise vulnerable.

## 5 Placements: Current position and achievements to date

- Since 2002, every child who has been matched for **adoption** in Wiltshire has received an assessment by Adoption Support Services. The adoption support plan can include financial support, respite care, equipment for therapeutic services etc. Approximately 22 children are matched for adoption each year. This has increased over the last 5 years.
- 2 full time **Adoption Support workers** provide practical and direct support to adoptive families, undertake life story work with adopted young people and arrange family days/support events.
- **Wiltshire Adoption Service** continues to develop a range of support services to sustain adoptive placements particularly when the adopted child/ren reaches adolescence. This is when placements often become unstable.
- The **Adoption Support Service** in Wiltshire offers groups for adoptive parents on attachment to enable understanding of children's developmental/behavioural needs. These groups have been very effective and are run in partnership with a clinical psychologist. Feedback from group users suggests that the groups help parents to sustain placements. Adoption Support plays an important role in home finding for adoption, particularly for children with complex needs/disabilities. They have been able to negotiate some complex packages of support to enable and sustain placements.
- Numbers of **out of county placements** have decreased in the past year.
- All providers are signed up to the **National Framework Contract for IFA Contracts**. Tenders for IFAs/Residential Children's Homes are built around outcomes which incorporate issues of equality and diversity.
- The **Foster Care Communication Strategy and Plan** is targeting recruitment to attract a diverse range of carers.
- The Wiltshire Council **Foster Carers' Charter** has been signed with input from the Children in Care Council.
- As of March 2012, there are 40 children with complex needs who are looked after in the Child Disability Teams – there may be more who are looked after in other teams. The 40 include full-time LAC and Short Break LAC (i.e. where children and young people with disabilities receive care away from home for over 75 nights a year).
- Wiltshire has 2 **Specialist Child Disability Teams**. This specialist resource ensures the needs of looked after children and young people with disabilities are met in a timely and suitable manner. The Teams work across the full range of social care needs including safeguarding and looked after children and young people. Work is being undertaken to ensure that children and young people with disabilities who are looked after receive the same quality service as every looked after child and young person for example, receiving the same leaving care service and completion of pathway plans. Management costs have recently reduced by moving from 3 Specialist Child Disability Teams to 2.
- Wiltshire is a **Pathfinder authority** for the Green Paper on SEN and Disability. The Disabled Children and Adults (DCA) Pathfinder is currently in the process of creating a 0-25 service for children and young people with disabilities and special educational needs and their families, who require support to be included in their community.
- Aiming High for Disabled Children (2009) requires every authority to have a Short Break programme. In this context a Short Break is a child or young person with disabilities

having access to enjoyable, life-enhancing opportunities. In Wiltshire parents/carers worked in partnership to devise the **Wiltshire Short Break programme and Local Offer**. In 2011/12, 970 families took up the Short Break programme and Local Offer. Families have used the Local Offer payment in innumerable ways to provide short breaks for their children and young people. Aiming High is evidence that services have been transformed with parents as champions. This partnership working and the Short Breaks programme has received national acclaim. 95.3% of families said that the Short Breaks their child accesses were 'good' or 'excellent'; 95.4% rated the Wiltshire Local Offer as 'good' or 'excellent'. The Local Offer take up has continued to increase and will go up to over 1000 next year. Personal budgets will start to impact from April onwards.

- An **Autism Spectrum Conditions (ASC) review** is currently underway. There has been an increase in the numbers of children and young people with complex needs, many of whom have autism and the review is examining current practice in supporting children and young people with autism and complex needs locally. Recommendations for change will be made to the Children and Young People's Trust Commissioning Executive to improve outcomes for children and young people with autism.

## 6 Leaving care: Current position and achievements to date

- Early in 2011 a draft **16-24 accommodation** strategy was produced. The strategy has not yet been finalised. However, work has continued on developing a range of accommodation options and taking forward 16-24 accommodation work.
- Wiltshire has **partnership agreements with accommodation providers for young people aged 16-24**: a 'trainer flat' in Salisbury owned by Wiltshire Council Housing Department and a 'trainer flat' in the North of the County which is currently with the Westlea Board for approval); Shared Housing and Starter Tenancies project; and 12a Northgate Street which belongs to Ridgeway Housing Association. The 'trainer flats' have been designed with housing partners with the involvement of young people and will offer care leavers the opportunity to experience the realities of independent living before they move on to their own tenancies.
- The 2009 Viewpoint report (consultation with young people) raised the issue that most young people aged 16+ did not have a **pathway plan** (505). Through the LAC improvement group 2010 and work with the LAC practice manager this was taken forward positively. The latest figures for LAC teams (reported to Corporate Parenting in January 2012) showed 100% compliance in the Children in Care teams.
- **Over 90% of 16 year old children in care/care leaver's were in Education, Employment and Training as of December 2011** (internal data).
- A **care leavers mentoring programme** is in the early stages of development and the Director of Children's Services is leading the way by mentoring a young person.
- There is a **draft Partnership NEET Reduction Action Plan 2012-13**. The Commissioning Strategy will take forward the actions identified around LAC NEET from this plan.
- There are **Personal Advisers** tasked to work directly with care leavers to support them to move into education, employment and training. As at 19/01/2012, the Personal Advisers currently monitor 265 post-16 young people currently in care or care leavers as part of the EET monitoring group.
- Plans are in place to develop **apprenticeship opportunities** for young people.

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**Wiltshire Council**

**Cabinet**

**19 June 2012**

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Subject:          **Falls and Bone Health Strategy**

Cabinet member:  **Councillor Keith Humphries, Public Health & Protection Services**

Key Decision:     **No**

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| Executive Summary |
| --- |
| To provide an overview of the updated Wiltshire Falls and Bone Health Strategy. |

| Proposal |
| --- |
| **That Cabinet :**<br><br>a)  **notes this update of the strategy and**<br><br>b)  **agrees the key areas for action.** |

| Reason for Proposal |
| --- |
| The Falls and Bone Health Strategy is crucial to enable a reduction in falls and falls related injuries. This strategy is an update of the Wiltshire Falls and Bone Health Strategy which was published in 2009. It is expected that the 2012 strategy will remain valid for two years. |

| **Maggie Rae**<br>**Corporate Director of Public Health and Public Protection** |
| --- |

**Wiltshire Council**

**Cabinet**

**19 June 2012**

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| | |
|---|---|
| **Subject:** | **Falls and Bone Health Strategy** |
| **Cabinet member:** | **Councillor Keith Humphries, Public Health & Protection Services** |
| **Key Decision:** | **No** |

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## Purpose of Report

1. The purpose of this paper is to update the Cabinet on the Wiltshire Falls and Bone Health Strategy and the five key areas for action.

## Background

National

2. As people get older they may fall more often for a variety of reasons, including problems with balance, poor vision, and dementia. Up to 1 in 3 people aged 65 or over fall per year. It may not be possible to prevent falls completely, but people who tend to fall frequently may be enabled to fall less often.

3. Around 40-60% of falls lead to injuries, with 5% causing fractures. There are other serious consequences of falling;
   o Fear of falling,
   o Loss of confidence,
   o Loss of mobility which can lead to social isolation and depression,
   o Loss of independence,
   o Disability.
   These can lead to increased dependency on carers and services.

4. Nationally the incidence of falls is currently increasing by 2% each year. As England has an ageing population unless action is taken it is likely that this rate will continue to rise.

Local

5. In Wiltshire in 2010/11 there were 3,054 admissions as a result of a fall per 100,000 people aged over 65. This means on average every day there were seven emergency admissions for falls in people aged 65 or over. There has been a 34% increase in admissions to hospital as a result of a fall in people aged over 65 between 2003/04 and 2010/11

6. 541 people aged 65 or over who lived in Wiltshire suffered a hip fracture in 2010/11. Hip fractures in this age group cost around £3.2 million in hospital costs. This does not include costs to the patient or social care.

7. Older people with osteoporosis are particularly at risk from falling, as osteoporosis is a condition where bones become fragile and break more easily. An estimated 20,000 post-menopausal women in Wiltshire have osteoporosis.

Falls prevention
8. To reduce falls and fractures it is important that:
   - Those who have fallen or may fall are identified.
   - An individual person's risk of falling is assessed.
   - The treatment plan takes into account all an individual person's falls risks. Those at risk of falling are encouraged to take part in falls prevention programmes.
   - Those with osteoporosis should be treated appropriately.

9. There are a wide range of services available in Wiltshire to prevent falls and fractures and to treat those who have fallen or fractured. In order to ensure effective provision for falls and bone health services across health and social care in Wiltshire the Kaiser Pyramid of Care model is used. This is a template for care used to identify groups and define the level of management appropriate for each group. For falls prevention it adopts a model of universal, targeted and specialist services for falls, fractures and osteoporosis.

**Main Considerations for the Council**

10. The main aims of the Falls and Bone Health Strategy are to:
    - Improve falls and fracture services used by Wiltshire residents and ensure that services respond to the needs of older people,
    - Halt the rising number of falls and related injuries experienced by older people each year,
    - Meet local and national targets on falls and fracture prevention
    - Support older people to access a wide range of community resources.

11. The Wiltshire strategy action plan has been developed using national and local information on falls, fractures and osteoporosis. This encompasses the results of the 2010 Royal College of Physicians falls and bone health audit. The audit gives detailed information on areas that Wiltshire performed well in and areas that need strengthening in Wiltshire in relation to falls, fractures and bone health.

12. In addition consultation with key stakeholders has developed the priority areas for local action. The Falls and Bone Health Strategy will be launched for public consultation during falls awareness week (18th-22nd June).

**There are five priority areas for local action:**

➢ **Update the falls and osteoporosis care pathways for use across Wiltshire.**

13. The aim of updating the pathways is to; increase the number of patients screened for falls or increased falls risk, increase the proportion of people who have had a fracture, fall or are at increased risk of falls having multifactorial falls risk assessment and to increase the proportion of patients who have had a fracture or fall being assessed for their need for treatment to prevent osteoporotic fractures.

> **Make sure an individual person's risk of falling is assessed and people have access to evidence-based treatments.**

14. In studies multifactorial falls assessment and interventions for known fallers or those with identified risk factors show a significant 14% reduction in the proportion of fallers in the intervention group. Strength and balance training in a targeted population show a significant 20% reduction in the number of people falling and a significant 33% reduction in the number of people sustaining a fall with an injury.

> **Make sure an individual person's risk of osteoporosis is assessment and suitable treatment started.**

15. Appropriate treatment for osteoporosis decreases the number of fragility fractures, including hip fractures, wrist fractures and vertebral fractures.

> **Maintain improvement of hospitals in the management of hip fractures.**

16. Best-practice care for those who have suffered a hip fracture decreases the morbidity and mortality associated with hip fractures, including their need for increased social care.

> **Raise awareness of osteoporosis and falls with older people, their carers, staff who work with them and other health care providers. Including the promotion of healthy lifestyles.**

17. Improved awareness of falls and bone health can assist people to take actions themselves to decrease their risk of falls and fractures. These include simple actions such as having you eye sight checked, staying active and having a healthy diet.

## Environmental and climate change considerations

18. An increase in the number of patients being assessed and requiring interventions for falls may lead to additional travel by patients or healthcare professionals. However additional interventions should lead to a reduction in the rising number of falls and fracture hospital attendances. Additional treatment for osteoporosis should also lead to a reduction in fractures and hospital attendances.

## Equalities Impact of the Proposal

19. As the risk of falls and fractures increases as people get older, any work to prevent falls and fractures necessarily requires a focus on those aged over 50.

20. The strategy's key areas for action aim to improve equity of access to falls services.

## Risk Assessment

21. If any of the five priority areas are not agreed there is a risk that falls and fractures will continue to increase in Wiltshire. This could result in serious consequences, both physical and psychological, for affected residents and their families. In addition to bruising, fractures, and in some cases, death, a fall can destroy confidence, increase isolation and reduce independence. Another risk relates to the increase in health and social care costs associated with any increase in levels of falls and fractures.

## Financial Implications

22. The strategy will be delivered within the current financial position. There are no known financial implications. The responsibility of Public Health will transfer to Local Authorities from April 2013. Although details are still being finalised at a national and local level, the indication on funding levels for Wiltshire is that the ring-fenced grant in 2013/14 should be sufficient to cover planned activities within Public Health, thus covering the life of the strategy.

## Legal Implications

Potential Interface with Health and Social Care Act 2012
Section 193 – Health and Well Being boards "HWB" are to be established in every unitary local authority.
Shadow boards should be in place prior to this statutory duty to establish a health and well being board commencing in April 2013.
There are two main statutory duties of the HWB which are:-
   a) Section 191 – Assessing the needs of the local population.  HWB's are therefore to prepare a joint strategic needs assessment.

   b) Section 192 – Co-ordinate commissioning of health and social care services and therefore have a joint health and well being strategy.  Health and social care commissioners must have regard to this.

The Wiltshire "Falls and Bone Health Strategy" therefore follows the principals of the recent legislation.

Equality Impact Assessment
The unified public sector equality duty is now contained within the Equality Act 2010 which came into force on 5th April 2011.
Section 149 of this legislation expressly contains the public sector equality duty which replaces and augments the previous public sector equality duties contained in section 76A of the Sex Discrimination Act 1975, section 71 of the Race Relations Act 1976 and section 49A of the Disability Discrimination Act 1995.
*Section 149 Equality Act explicitly states*
*"(1) A public authority must in the exercise of its functions, have due regard to the need to*
   *(a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;*
   *(b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;*

*(c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it*

*(2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to matters mentioned in subsection (1)*

*(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant characteristic and persons who do not share it involves having <u>due regard</u>, in particular, to the need to –*

*(a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic*

*(b) take steps to meet the needs of persons who share a relevant characteristic that are different from the needs of persons who do not share it;*

*(c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is proportionately low.*

*(4) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled person's disabilities.*

*(5) Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having <u>due regard</u> in particular to the need to-*

*(a) tackle prejudice and*

*(b) promote understanding*

*(6) Compliance with the duties in this section may involve treating some persons more favourably than others but that it is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.*

*(7) The relevant protected characteristics are – <u>age; disability</u>, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation.*

*(8) A reference to conduct that is prohibited by or under this Act includes a reference to (a) a breach of an equality clause or rule (b) a breach of non – discrimination rule.*


<u>Conclusion</u>
Therefore the public sector duty has three primary limbs the need to
  (a) Eliminate discrimination
  (b) Advance equality of opportunity
  (c) Foster good relations between those sharing or not sharing protected
      characteristics

The equality of opportunity limb at (b) above includes (i) removal of disadvantage from particular groups (ii) meeting the needs of particular groups (iii) encouraging under represented groups to participate in public life.
The fostering good relations limb encompasses (a) tackling prejudice and (b) promoting understanding e.g. an example of this is contained in the strategy paper on Page 26 it states that a particular action is *"Staff training and public awareness of the risk and protective factors for falls and osteoporosis with older people…"*
The Strategy has due regard to its statutory duties as outlined above at section 149 (3) and (5) of the Equalities Act 2010.

The local authority has paid due regard in substance to its equalities duties under the Equality Act 2010 by focusing on a group with a protected characteristic i.e. age and or disability with the Wiltshire Falls and Bone Health Strategy.
I can see no reason for a further equalities impact assessment since the logic of the Strategy means performance of the public sector equality duty was integral to its outcome and Cabinet should therefore be advised to approve the updated strategy and key areas for action.

## Options Considered

23. Local data and evidence were used to generate the key actions along with consultation with key stakeholders.

## Conclusions

24. Cabinet is asked to note this update the strategy and agree the key areas for action.

**Maggie Rae**
**Director of Public Health and Public Protection**
**NHS Wiltshire and Wiltshire Council**

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May 2012

**Background Papers**
The following unpublished documents have been relied on in the preparation of this report: Wiltshire Falls and Bone Health Strategy 2012-14 (see appendix A)

**Appendices**
Appendix A: Wiltshire Falls and Bone Health Strategy 2012-14.
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# Wiltshire Falls and Bone Health Strategy

# 2012-2014

## ❖ <u>Executive Summary</u>

Falls are a common cause of injury and loss of independence in older people. Around 1 in 3 people aged over 65 have one or more falls every year, many of which may have been preventable. One of the most common serious injuries related to falls in older people is hip fracture.

The incidence of falls in England is currently increasing by 2% each year. There has been a 34% increase in falls admissions in the last 8 years. Every day in 2010/11 on average there were 7 non-elective admissions for falls in people aged over 65 living in Wiltshire. An estimated 20,000 women in Wiltshire have osteoporosis, with 25% of women 80 years or older having osteoporosis.

To reduce falls and fractures the National Institute for Health and Clinical Excellence (NICE) recommends; case/risk identification, multifactorial falls risk assessment, multifactorial interventions, encouraging participation in falls prevention programmes, professional education, and primary and secondary prevention of osteoporosis through nutrition, exercise and medication.

There are a wide range of services available in Wiltshire to prevent falls and fractures and to treat those who have fallen or fractured. In order to ensure effective provision for falls and bone health services across health and social care in Wiltshire the Kaiser Pyramid of Care model is used. This adopts a model of universal, targeted and specialist services for falls, fractures and osteoporosis.
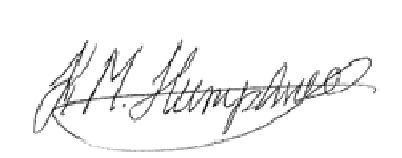
The strategy action plan uses national and local information on falls, fractures and osteoporosis. This encompasses the results of the 2010 Royal College of Physicians falls and bone health audit in which Wiltshire participated.

There are five priority areas for local action:

1) Update and implement falls and osteoporosis care pathways for use across Wiltshire which set out clearly what is expected at each stage.
2) Ensure adequate provision of multi-disciplinary assessment, interventions and evidence-based therapeutic exercise programmes.
3) Ensure adequate assessment, primary prevention and secondary prevention of osteoporosis across health and community services.
4) Review and maintain improvement of provider performance against the National Hip Fracture Database standards.
5) Raise awareness of osteoporosis and falls with older people, their carers, staff who work with them and other health care providers. Including the promotion of healthy lifestyles.

Maggie Rae
*Corporate Director of Public Health*
*and Public Protection*

Cllr Keith Humphries
*Cabinet Member for Public Health*
*and Protection Services*

## ❖ **Plain language summary**

The aim of this strategy is to reduce the number of people who fall in Wiltshire, and improve outcomes for those who do.

As people get older they may fall more often for a variety of reasons, including problems with balance, poor vision, and dementia. Up to 1 in 3 people aged 65 or over fall per year. It may not be possible to prevent falls completely, but people who tend to fall frequently may be enabled to fall less often.

The number of people falling in England and in Wiltshire is increasing. In 2010/11 in Wiltshire on average every day there were seven emergency admissions for falls in people aged 65 or over.

Older people with osteoporosis are particularly at risk from falling, as osteoporosis is a condition where bones become fragile and break more easily. An estimated 20,000 women in Wiltshire have osteoporosis.

To reduce falls and fractures it is important that:
- Those who have fallen or may fall are identified.
- An individual person's risk of falling is assessed.
- The treatment plan takes into account all an individual person's falls risks. Those at risk of falling are encouraged to take part in falls prevention programmes.
- Those with osteoporosis should be treated appropriately.

There are a wide range of services available in Wiltshire to prevent falls and fractures and to treat those who have fallen or broken a bone.

The Wiltshire strategy action plan has been developed using national and local information on falls, fractures and osteoporosis. There are five priority areas for local action:

1) Update the falls and osteoporosis care pathways for use across Wiltshire.

2) Make sure an individual person's risk of falling is assessed and people have access to evidence-based treatments.

3) Make sure an individual person's risk of osteoporosis is assessment and suitable treatment started.

4) Maintain improvement of hospitals in the management of hip fractures.

5) Raise awareness of osteoporosis and falls with older people, their carers, staff who work with them and other health care providers. Including the promotion of healthy lifestyles.

# ❖ <u>Contents</u>

## ❖ <u>Glossary</u>

**Anti-resorptive therapy:** Specific treatment for osteoporosis, which includes a number of different medicines, for example alendronate.

**Care bundle: A group of evidence-based practice points that, when combined, define best care and significantly improve patient outcome.**

**DXA or DEXA:** Dual energy X-ray is a type of X-ray that measures the amount of calcium in bones. This measurement is often referred to as bone mineral density (BMD). DXA scans are most commonly used for diagnosing osteoporosis.

**Fall:** A fall is defined as an event which results in a person coming to rest inadvertently on the ground or floor or other lower level.

**Falls risk assessment:** Assessment used to establish how likely it is that someone will fall.

**Kaiser pyramid of care:** This is a model for care used to identify groups and define the level of management appropriate for each group.

**Multi-factorial:** Service that covers many different aspects. For example with falls it would cover eye-sight, balance, medication, environment etc.

**NICE:** National Institute for Health and Clinical Excellence

**Osteoporosis:** Some of the materials that make up bone are lost as part of normal ageing. This can lead to osteoporosis, a condition in which bones become fragile and break easily. These fractures are most common in bones of the spine, wrists and hips. Women who have gone through the menopause are at increased risk of osteoporosis because their ovaries no longer produce oestrogen, which protects against bone loss.

**Postural stability exercise:** Exercise to improve balance and strength, and reduce the risk of falling.

**QOF:** Quality outcome framework. This is an annual reward and incentive programme for all GP surgeries in England, detailing practice achievement results. It is not about performance management but resourcing and then rewarding good practice.

**POPPI:** Projecting Older People Population Information System

**Trip or slip:** These are not defined separately within the strategy. If someone has fallen, tripped or slipped a careful history is needed to know whether further assessment or interventions are required.

## ❖ <u>Introduction</u>

*"Falls lead to physical injury, loss of function, loss of independence and increased mortality. They are the leading cause of mortality due to injury in older people aged over 75 in the UK. Over 400,000 older people in England attend accident and emergency departments following an accident and up to 14,000 people a year dies in the UK as a result of an osteoporotic hip fracture."*[1]

This strategy is an update of the Wiltshire Falls and Bone Health Strategy which was published in 2009. It is expected that the 2012 strategy will remain valid for two years.

The strategy primarily focuses on older people as research provides evidence that this group are more at risk of falls than any other group.

**Strategy Development Process**
The Public Health team within Wiltshire Council has the strategic lead for Falls and Bone Health and has led on the update of the Wiltshire Strategy in consultation with a wide range of stakeholders.
Service users were consulted during the development of the first strategy and their views along with those heard at a series of workshops with older people run during 2010 by Wiltshire Council have been incorporated into this strategy.

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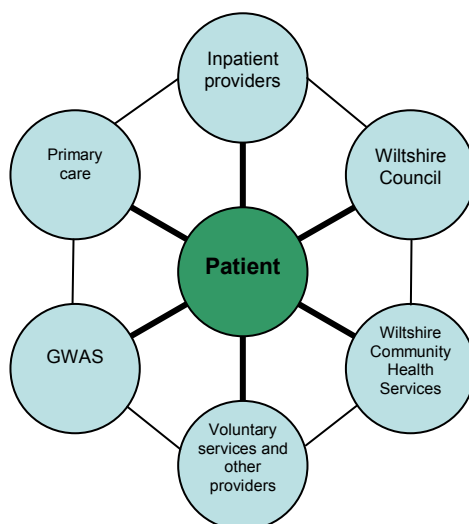
[1] Department of Health. *National service framework for older people, standard 6, Falls,* London: DH, 2001.

**NHS Wiltshire and Wiltshire County Council have agreed the following shared outcomes**
- To reduce the total number of people entering care homes (this to include people who are self-funding).
- To reduce the numbers of people who are in residential care who then require transfer to care homes with nursing (the escalation rate).
- To, wherever possible and appropriate, avoid emergency admissions through the development and use of alternative care pathways.
- To reduce the average delayed transfers of care over 52 weeks per 100,000 population.
- To reduce length of stay for emergency admissions to acute hospitals and all admissions to community hospitals.

Falls and bone health has the potential to impact on all of these shared outcomes.

## ❖ <u>Background</u>

Falls are a common cause of injury and loss of independence in older people. Bone health (osteoporosis) is addressed in this strategy as fractures are often the result of a fall.

*"The consequences of a fall and associated injuries have an impact on all agencies who work with older people. All local organisations working with older people are part of the solution."* [2]

The incidence of falls is currently increasing by 2% each year. As England has an ageing population and unless action is taken it is likely that this rate will continue to rise. By 2025, the number of people aged over 65 in England is due to rise by a third, the number of people over 80 is expected to double and there will be four times as many people aged over 100. (Department of Health, 2009a) The South West region faces a particular challenge as many people choose to retire here. Graph 1 shows a 20.1% increase in older people in Wiltshire's population between 2002 and 2010. Not only does this mean there will be an increasing numbers of falls and fractures, but also more people with dementia and long-term conditions.

Graph 1: Percentage population change 2002-2010.
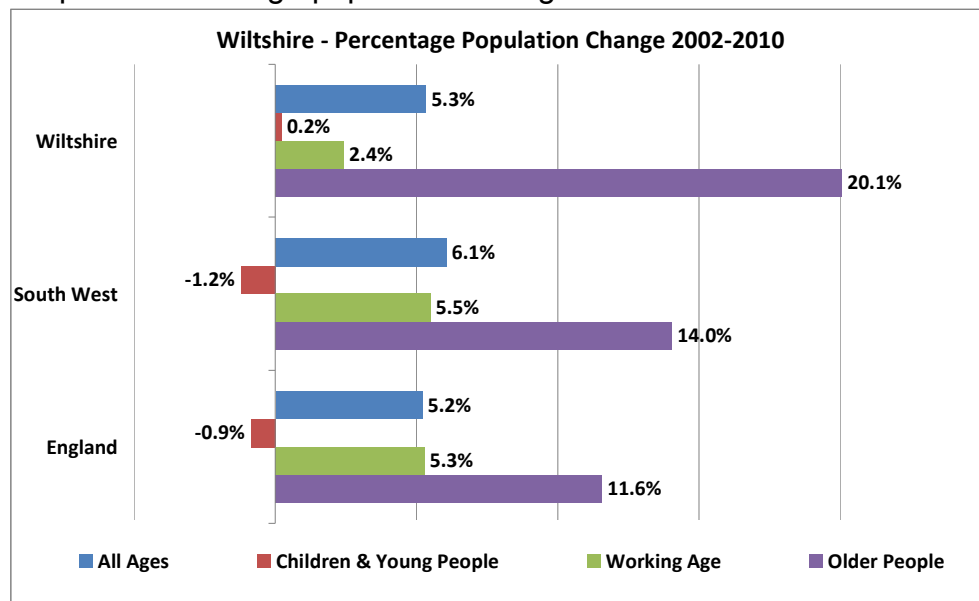


Older people are defined as males 65 or over and females 60 or over.
Source: JSNA 2011 (ONS Mid-Year Estimates 2002 and 2010)

A national analysis of Hospital Episodes Statistics data showed that "*bed-days following unscheduled admissions for fractures in over 60 year olds account for more than 2 million bed days in England alone. This is substantially more than is associated with stroke.*" [3]

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[2] Department of Health, 2009. Falls and fractures: effective interventions in health and social care.
[3] Royal College of Physicians (2011) Falling standards, broken promises. Report of the national audit of falls and bone health in older people 2010.

**Policy Context**

This strategy is based on the following policy and guidance documents:
- NICE Clinical Guidance 21 Clinical practice guideline for the assessment and prevention of falls in older people (2004).
- The Care of Patients with Fragility Fracture (British Orthopaedic Association and British Geriatrics Society, 2007).
- NICE Technology Appraisal Guidance 160: Primary prevention of osteoporotic fragility fractures in postmenopausal women (2008).
- NICE Technology Appraisal Guidance 161 Review of treatments for the on secondary prevention of osteoporotic fragility fractures in post-menopausal women (2008).
- Falls and fractures: effective interventions in health and social care (Department of Health, 2009).
- NHS Operating Framework, 2011-2012.
- Royal College of Physicians' Falls and Bone Health Audit 2010.
- Public Health Outcomes Framework (Department of Health, 2011).
- NICE Clinical Guidance 124: Hip fracture (2011).

## ❖ **Epidemiology of falls**

Over 400 potential risk factors have been identified for falling. One way to group these is into five categories; environmental, medication, medical conditions and changes associated with ageing, nutritional, and lack of exercise. [4] It is often a combination of factors that lead to falls and all of these need to be addressed to reduce someone's risk of falling or suffering from a fracture.

Nationally each year 1 in 3 people aged over 65 and almost 50% of people aged over 85 have one or more falls every year. Over half of residents in institutional care have had at least one fall over a one-year period. Two out of three previous fallers will fall in the subsequent year, and approximately 65% of women and 44% of men, who fall, fall inside their usual residence. A further 11% of women and 25% of men fall in their garden. In the community most falls occur during the day. [4][5]

Around 40-60% of falls lead to injuries, with the majority being minor injuries. However 5% of falls cause major injuries and a further 5% cause fractures. Falls are the commonest cause of injury-related death in people over 75 years.
There are other serious consequences of falling:
- Fear of falling.
- Loss of confidence.
- Loss of mobility which can lead to social isolation and depression.
- Loss of independence.
- Disability.

These can lead to increased dependency on carers and services.

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[4] Masud, T. and Morris R. Epidemiology of falls. *Age and Ageing* 2001; 30-S4:3-7.
[5] Department of Health (2011) Healthy Lives, Healthy People.

## ❖ <u>**Falls and fracture in Wiltshire**</u>

### <u>Falls</u>

In 2010/11 there were 3,054 admissions as a result of a fall per 100,000 people aged over 65. That means that on average for every day in 2010/11 there were around 7 non-elective admissions for falls in people aged over 65 living in Wiltshire. With one in 33 people aged 65 or over being admitted to hospital as a result of a fall. 20% of Great Western Ambulance Service callouts in quarter one of 2011/12 were for falls.

As a large number of falls are not admitted to secondary care these numbers are an under-estimate of the true burden of falls in the community. Estimates from Projecting Older People Population Information System (POPPI) show that for every hospital admission for a fall there are two ED attendances for a fall.

There has been a 34% increase in admissions to hospital as a result of a fall in people aged over 65 between 2003/04 and 2010/11 (graph 2). There is variation in falls admission between community areas (graph 3). The admissions to hospital due to falls per 100,000 people aged 65 or over are statistically significantly higher in Salisbury compared to the Wiltshire average and statistically significantly lower in Pewsey and Calne.

Graph 2: Emergency admission rate to hospital as a result of a fall for people 65 or over.
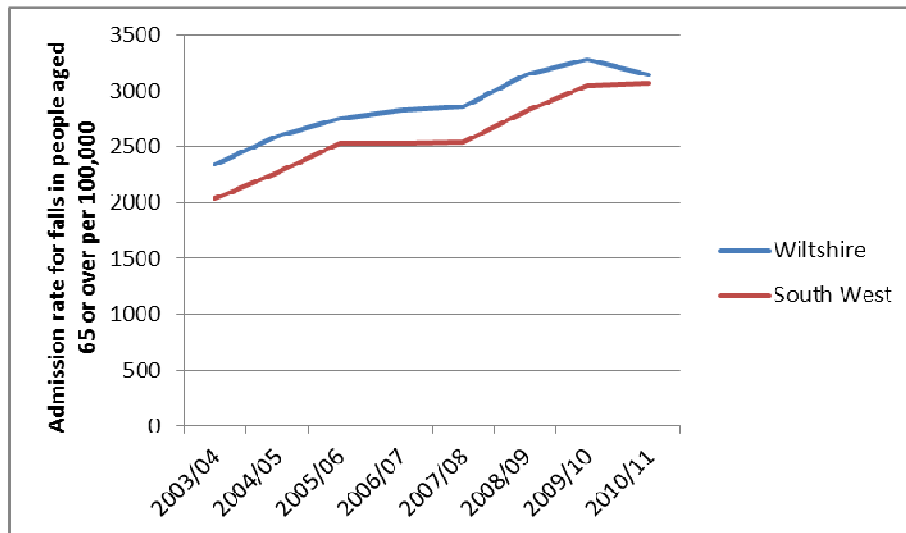


Data source: Dr Foster Intelligence (Secondary User System hospital statistics).

11

Graph 3: Falls admission rate per 100,000 people 65 or over by Community Area.
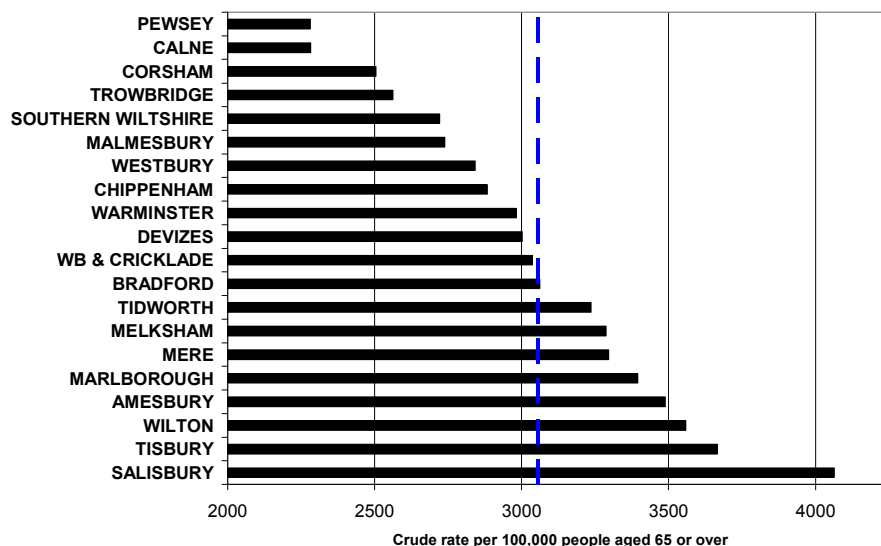


Data source: Community Area JSAs 2011 from Dr Foster Intelligence (Secondary User System hospital statistics).

There are approximately 85,000 people aged 65 or over in Wiltshire. In 2010/11 there were 1,274 people aged 65 or over in Wiltshire living in residential care and 796 in nursing care. This means there are around 2,000 people living in residential or nursing care who are at high risk of falls This is only those people in receipt of services from the Department of Community Services and Wiltshire Mental Health partnership NHS Trust.

There has been a 19.3% increase in alcohol related falls leading to hospital admissions in people aged over 65 in Wiltshire between 2002 and 2007.

**Fractures**

541 people aged 65 or over who lived in Wiltshire had a hip fracture in 2010/11. Hip fractures in this age group cost around £3.2 million in hospital costs. This does not include costs to the patient or social care. There will also be a large number of other osteoporotic fractures, such as wrist and vertebral fractures

## ❖ <u>**Epidemiology of osteoporosis in Wiltshire**</u>

An estimated 2 million women in England and Wales have osteoporosis. 25% of women 80 years or older have osteoporosis. For a woman over 50 her lifetime risk of a vertebral fracture is 1in 3 and for a hip fracture 1 in 5.

Estimates suggest that there are 180,000 osteoporosis related fractures in England and Wales each year. 70,000 of these are hip fractures, 25,000 vertebral fractures and 41,000 wrist fractures. 50-70% of vertebral fractures do not come to clinical attention.[6]

A broken hip can lead to serious disability such as reduced mobility, admission to a nursing home, restricted driving and other difficulty with daily living. Vertebral compression fractures due to osteoporosis can lead to back pain, height loss, spinal curvature and make activities of daily living much more difficult.

The NICE costing template uses national data for osteoporosis to give local estimates for osteoporosis and fragility fractures. This template estimates that there are 86,460 post menopausal women in Wiltshire of whom 10,372 women have osteoporosis without a prior fracture and 9,754 women with osteoporosis with clinically apparent osteoporotic fragility fractures.[7]

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[6] NICE TA160: Osteoporosis: Primary prevention guidance. 2011. Available at: http://www.nice.org.uk/nicemedia/live/11746/47176/47176.pdf.
[7] NICE Osteoporosis– secondary prevention including strontium ranelate: costing template. 2008. Osteoporosis – primary prevention: costing template. 2008. Available at: http://www.nice.org.uk/nicemedia/live/11748/42723/42723.xls

## ❖ **What works in falls and fracture prevention and management?**

NICE identifies five key priorities for falls and fracture prevention[8]:

- *Case/risk identification*
  - o Older people in contact with healthcare professionals should be asked routinely whether they have fallen in the past year and asked about the frequency, context and characteristics of the fall/s.
  - o Older people reporting a fall or considered at risk of falling should be observed for balance and gait deficits and considered for their ability to benefit from interventions to improve strength and balance.

- *Multifactorial falls risk assessment*
  - o Older people who present for medical attention because of a fall, or report recurrent falls in the past year, or demonstrate abnormalities of gait and/or balance should be offered a multifactorial falls risk assessment. This assessment should be performed by healthcare professionals with appropriate skills and experience, normally in the setting of a specialist falls service. This assessment should be part of an individualised, multifactorial intervention.
  - o Multifactorial assessment may include the following:
    - − Identification of falls history.
    - − Assessment of gait, balance and mobility, and muscle weakness.
    - − Assessment of osteoporosis risk.
    - − Assessment of the older person's perceived functional ability and fear relating to falling.
    - − Assessment of visual impairment.
    - − Assessment of cognitive impairment and neurological examination.
    - − Assessment of urinary incontinence.
    - − Assessment of home hazards.
  - o Cardiovascular examination and medication review

*Multifactorial interventions*
  - o All older people with recurrent falls or assessed as being at increased risk of falling should be considered for an individualised multifactorial intervention.
  - o In successful multifactorial intervention programmes the following specific components are common (against a background of the general diagnosis and management of causes and recognised risk factors):
    - − Strength and balance training.
    - − Home hazard assessment and intervention.
    - − Vision assessment and referral.
    - − Medication review with modification/withdrawal.
  - o Following treatment for an injurious fall, older people should be offered a multidisciplinary assessment to identify and address future risk, and individualised intervention aimed at promoting independence and improving physical and psychological function.

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[8] NICE CG 21 - The assessment and prevention of falls in older people. 2004. Available at: http://guidance.nice.org.uk/CG21/Guidance/pdf/English.

- ***Encouraging the participation of older people in falls prevention programmes including education and information***
  - o Individuals at risk of falling, and their carers, should be offered information orally and in writing about what measures they can take to prevent further falls.

- ***Professional education***
  - o All healthcare professionals dealing with patients known to be at risk of falling should develop and maintain basic professional competence in falls assessment and prevention.

Osteoporosis assessment and treatment need to be integrated within primary care and falls services.

Primary and secondary prevention of osteoporosis through nutrition, exercise and medication is crucial. A Cochrane review (2011) shows that for postmenopausal women exercise will improve bone mineral density slightly and exercise will reduce the chances of having a fracture slightly. NICE has published technology appraisals for medications for primary and secondary prevention of osteoporosis (box 1). Another Cochrane review (2008) shows that the best estimate of what happens to women that have already been diagnosed with low bone density or have already had a fracture in the bones of their spine is:
- 12 out of 100 women had a spinal fracture when taking a placebo.
- 6 out of 100 women had a spinal fracture when taking alendronate.

*"There is strong evidence about the impact and cost benefit arguments for fracture prevention interventions ..."* [9]

*"Over a 5 year period £290,708 is saved in NHS acute and community services and local authority social case costs, against an additional £234,181 revenue costs. This is for an annual patient cohort of 797 hip, humerus, spine and forearm fractures anticipated from a 320,000 population."* [9]

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[9] Department of Health (2009b) Fracture prevention services: an economic evaluation.

Box 1: NICE primary and secondary prevention Technology Appraisal Guidelines.[10] [11]

*For primary prevention of osteoporotic fractures alendronate is recommended in:*
- Women aged 70 years or older who have an independent clinical risk factor for fracture (see section 1.5)
  OR an indicator of low BMD (see section 1.6)
  AND who are confirmed to have osteoporosis (that is, a T-score of −2.5 SD or below).
  In women aged 75 years or older who have two or more independent clinical risk factors for fracture or indicators of low BMD, a DXA scan may not be required if the responsible clinician considers it to be clinically inappropriate or unfeasible.
- Women aged 65–69 years who have an independent clinical risk factor for fracture (see section 1.5)
  AND who are confirmed to have osteoporosis (that is, a T-score of −2.5 SD or below).
- Postmenopausal women younger than 65 years who have an independent clinical risk factor for fracture (see section 1.5)
  AND at least one additional indicator of low BMD (see section 1.6)
  AND who are confirmed to have osteoporosis (that is, a T-score of −2.5 SD or below).

Alternative treatment options are recommended in women who cannot have alendronate and specific risk factors.

*For secondary prevention of fragility fractures alendronate is recommended in:*
- Osteoporotic fragility fractures in postmenopausal women who are confirmed to have osteoporosis (that is, a T-score of −2.5 SD or below).
- In women aged 75 years or older, a DXA scan may not be required if the responsible clinician considers it to be clinically inappropriate or unfeasible.

Alternative treatment options are recommended in women who cannot have alendronate and have specific risk factors.

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[10]NICE. TA 160 – Osteoporosis primary prevention. 2011. Available at: http://guidance.nice.org.uk/TA160/Guidance/pdf/English.
[11]NICE. TA 161 – Osteoporosis secondary prevention. 2008. Available at: http://guidance.nice.org.uk/TA161/Guidance/pdf/English

## ❖ <u>**Current service provision**</u>

There are a wide range of services available in Wiltshire to prevent falls and fractures and to treat those who have fallen or fractured.

The model of care for falls and fracture services is based on the Kaiser Pyramid of Care. In order to ensure effective provision across health and social care (including primary and secondary (specialist) care), Wiltshire has adopted a model of universal, targeted and specialist services for both falls and osteoporosis as per the illustration below. Within the model falls and fracture risk management are seen as the business of all health and social care providers in Wiltshire.
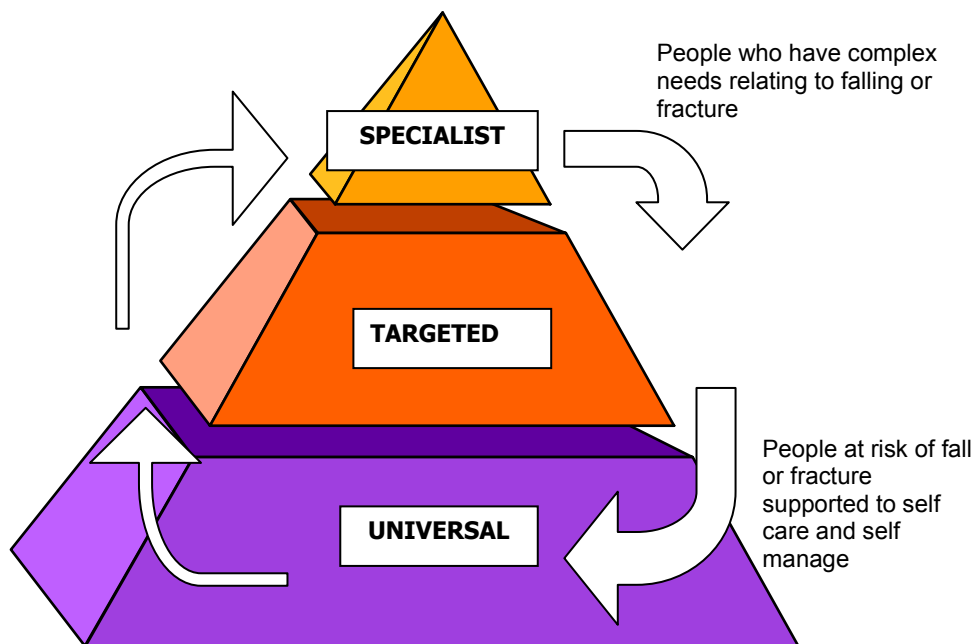


The model serves various purposes:
- Overall it provides a population based model of care.
- The pyramid shape of the model reflects the numbers of the population who would benefit from assessment and /or intervention at the three levels of care.
- It acts as a guide for service providers as to what level of assessment and intervention an individual requires.
- The 3 levels and the arrows indicate the need for service providers to assist people to move between the levels based on need.
- The stronger downward arrows indicate that the aim of assessment and intervention at levels 2 or 3 is to support people to move to the 'universal' level.

**Summary of services available in Wiltshire for fallers, people at risk of falling or having a fragility fracture**

| Organisation | Service provided |
|---|---|
| Great Western Hospital Community Adult and Children's Service (previously WCHS) | • Identification of potential fallers and osteoporosis and fracture in vulnerable patients.<br>• Multifactorial falls assessment,<br>• Delivery or referral to appropriate multifactorial interventions, including postural stability classes.<br>• Health promotion advice, including encouraging exercise.<br>• MIUs. |
| Inpatient providers | • Identification of potential fallers and osteoporosis and fracture in vulnerable patients.<br>• Assessment and management of non-elective admission.<br>• Maintaining National Hip Fracture Database standards.<br>• Maintaining National Patient Safety Agency standards.<br>• Discharge planning including appropriate referral to community care. |
| Primary Care | • Identification of potential fallers and osteoporosis and fracture in vulnerable patients.<br>• Medication monitoring and adjustment.<br>• Osteoporosis treatment.<br>• Health promotion advice, including encouraging exercise.<br>• Referral to appropriate agencies. |
| Wiltshire Council | • Health promotion advice, including encouraging exercise.<br>• Identification of potential fallers and osteoporosis and fracture in vulnerable patients.<br>• Motivate and promote independence.<br>• Postural Stability Classes.<br>• General exercise class provision for older people.<br>• Wiltshire Warm and Well Scheme.<br>• Equipments and adaptations.<br>• Help to Live at Home.<br>• Nutrition.<br>• Emergency alarms which includes a response service for those without family/friends.<br>• Social care including nursing and residential care.<br>• Transport.<br>• Local environment; parks, pavements, lighting.<br>• Good Neighbour service. |

| | |
|---|---|
| Great Western Ambulance Service (GWAS) | • Assessment and management of falls in the community.<br>• Referral to community care where appropriate as per GWAS falls pathway. |
| Avon and Wiltshire Mental Health Partnership Trust | • Identification of:<br>    ○ Potential fallers,<br>    ○ Osteoporosis and fracture in vulnerable patients.<br>• Health promotion advice, including encouraging exercise.<br>• Monitoring medication. |
| Care homes | • Falls pathway for care home.<br>• Identification of:<br>    ○ Potential fallers,<br>    ○ Osteoporosis and fracture in vulnerable patients.<br>• Health promotion advice, including encouraging exercise.<br>• Monitoring medication. |
| Voluntary services including Age UK Wiltshire | • Good Neighbour service.<br>• Exercise classes.<br>• Toenail cutting service.<br>• Befriending.<br>• Osteoporosis support groups. |
| Opticians, pharmacists, dentists. | • Vision assessment.<br>• Medicine reviews. |

## ❖ Royal College of Physicians audit of falls and bone health in older people 2010: Results

Wiltshire participated in the 2010 Royal College of Physicians falls and bone health audit. The 2010 national audit aimed to:

- Assess the national progress in the implementation of integrated falls services as described in Chapter 6 of the NSF for Older People
- Assess the national progress in the implementation of the NICE Guideline and Health Technology Appraisal relating to falls and osteoporosis.

The Royal College of Physicians published the national audit report in May 2011 and the recommendations have been incorporated into the action plan for this strategy.[12]

**Wiltshire performed well in the following areas:**
- Multi-factorial falls risk assessment especially the following aspects:
  - Cardiovascular (heart) assessment.
  - Medication review within 12 weeks of a fracture.
  - Home hazard and cognitive assessment.
  - Continence assessments for non-hip fracture patients.
- Exercise interventions for non-hip fracture patients.
- Local multi-professional falls service.
- Falls co-ordinator.
- Consultant geriatrician input and commitment to falls service.
- Inpatient falls prevention.

**Some areas need strengthening:**
- Osteoporosis assessments and treatment for patients in primary care.
- Falls risk and bone health assessment for older people who have had a fall or fragility fracture.
- Care pathway development.
- Staff training and awareness of falls, fractures and osteoporosis.
- Promotion of a healthy lifestyle including physical activity and nutrition.
- Some aspects of multi-factorial falls risk assessment:
  - Vision, mobility & function assessments.
  - Continence assessments for hip fracture patients.
- Access to falls clinic or similar service.

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[12] Royal College of Physicians (2011) Falling standards, broken promises. Report of the national audit of falls and bone health in older people 2010.

## ❖ National Hip Fracture Database (NHFD) standards

The NHFD audits care against six blue book standards (evidence-based best practice):
- Prompt admission to orthopaedic care,
- Surgery within 48 hours of admission and within normal working hours,
- Nursing care aimed at minimising pressure ulcer incidence,
- Routine access to orthogeriatric medical care,
- Assessment and appropriate treatment to promote bone health,
- Specialist falls assessment.

The 2011 NHFD report, which audited from April 2010 to March 2011, shows that local acute providers (Salisbury Foundation Trust, Royal United Hospital Bath, and Great Western Hospital Swindon) are performing well in the majority of these six main standards (table 1).[13]

Table 1: Percentage of patients who were admitted for a hip fracture in 2010/11meeting certain aspects of the six NHFD blue book standards.

| | Royal United Hospital Bath | Salisbury Foundation Trust | Great Western Hospital | South West | National |
|---|---|---|---|---|---|
| **Number of hip fractures** | 469 | 226 | 363 | 6539 | 61202 |
| **Admitted to orthopaedic ward in 4 hours (%)** | 41 | 36 | 79 | 50 | 48 |
| **Surgery within 48 hours (%)** | 88 | 88 | 94. | 89 | 86 |
| **Pressure ulcers (%)** | 4 | 4 | 5 | 3 | 3 |
| **Assessed by geriatrician (%)\*** | 31 | 49 | 74 | 47 | 43 |
| **Bone protection medication started on this admission (%)#** | 60 | 70 | 75 | - | 52 |
| **Specialist falls assessment or awaiting clinic review (%)#** | 84 | 92 | 98 | - | 81 |

\*does not include if assessed by physician
#approximate values
Data source: National Hip Fracture Database national report 2011.

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[13] NHS information centre. The National Hip Fracture Database national Report 2011. Available at: http://www.nhfd.co.uk/003/hipfractureR.nsf/NHFDNationalReport2011_Final.pdf.

## ❖ Action plan

Using the national and local information of falls, fractures and osteoporosis the following action plan has been developed. This encompasses the results of the 2010 Royal College of Physicians falls and bone health audit.

There are five priority areas for local action:

1) Update and implement falls and osteoporosis care pathways for use across Wiltshire which set out clearly what is expected at each stage.

2) Ensure adequate provision of multi-disciplinary assessment, interventions and evidence-based therapeutic exercise programmes.

3) Ensure adequate assessment, primary prevention and secondary prevention of osteoporosis across health and community services.

4) Review and maintain improvement of provider performance against the National Hip Fracture Database standards.

5) Raise awareness of osteoporosis and falls with older people, their carers, staff who work with them and other health care providers. Including the promotion of healthy lifestyles.

Each action area has several aspects related to it and these are detailed in the implementation plan. Reports of progress against the action plan will be to the Health Improvement Partnership (HIP) and the action plan will be updated as required for 2013/14.

## ❖ Implementation plan

1. Update and implement falls and osteoporosis care pathways for use across Wiltshire which sets out clearly what is expected at each stage. The aim is to increase the number of patients screened for falls or increased falls risk. And increase the proportion of people who have had a fracture, fall or are at increased risk of falls having multifactorial falls risk assessment. And to increase the proportion of patients who have had a fracture or fall being assessed for their need for anti-resorptive therapy to prevent osteoporotic fractures.

| Actions | Target date for completion | Lead | Measurable Outcome |
|---|---|---|---|
| Update and implement a falls care pathway for use across Wiltshire which sets out clearly what is expected at each stage and is accompanied by referral forms. | July 2012 | Public Health | Updated pathway, with plan for dissemination and implementation.<br><br>Audit of compliance with falls care pathway 6 months after implementation. |
| Develop and implement an osteoporosis care pathway for use across Wiltshire which sets out clearly what treatment/response is required at each stage and is accompanied by referral forms. | July 2012 | Public Health | Updated pathway, with plan for dissemination and implementation.<br><br>Audit of compliance with falls care pathway 6 months after implementation. |
| Monitor GWAS falls pathway and support further development if required. | December 2012 | GWAS<br>Public Health | Conveyance rates for falls.<br>Referrals from GWAS to WCHS. |
| Engage with primary care to assist closer working with care homes. Introduce a proforma of best practice for care homes pathways, policies and training. Ensure that patient annual review includes questions about falls & bone health, and there is a clear referral route | April 2013 | Primary care<br>Public Health | Review of use of proforma and patient annual review. |

2. Ensure adequate provision of multi-disciplinary assessment, interventions and evidence-based therapeutic exercise programmes.

| Actions | Target date for completion | Lead | Measurable Outcome |
|---|---|---|---|
| Undertake review of falls clinics and falls services available in one area of Wiltshire to identify best practice, and develop recommendations for improvement. Disseminate findings to other areas of Wiltshire. | October 2012 | Public Health<br>Primary Care<br>Commissioning | Recommendations for falls clinics and falls services.<br>Annual review of service provision.<br>Community services 6 monthly audit of falls service (scorecard outcomes) |
| Undertake a review of exercise and postural stability classes provided across Wiltshire and develop recommendations for improvement. Ensure that fallers/fracture patients can access evidence-based therapeutic exercise programmes (Otago and/or FaME) to be used for falls prevention within 12 weeks of the fall. | October 2012 | Public Health<br>Wiltshire Council | Recommendations for exercise and postural stability classes.<br>6 monthly report on the location, type and number of classes, number of people attending and length of time attending for. |
| Transient loss of consciousness pathway. | | Public Health<br>RUH | Prospective study of patients against the pathway and retrospective review of patient notes against the pathway. |
| Monitor referrals to Help to Live at Home. | April 2013 | Wiltshire Council | Annual referrals to HTLAH. |

3. Ensure adequate assessment, primary prevention and secondary prevention of osteoporosis across health and community services.

| Actions | Target date for completion | Lead | Measurable Outcome |
|---|---|---|---|
| Engage with GPs to develop a plan for the introduction of the osteoporosis QOF in April 2012.<br><br>This will include reviewing the DXA referral process and ensuring awareness of osteoporosis prescribing guidelines produced by Bath Clinical Area Partnership Prescribing and Therapeutics Committee in conjunction with NHS Wiltshire (BCAP). | April 2013 | Public Health<br><br>Primary Care<br><br>Medicines Management | Annual osteoporosis QOF achievement.<br><br>Annual report on number of DXA scans.<br><br>Annual report on osteoporosis prescribing costs. |

4. Review and maintain improvement of provider performance against the National Hip Fracture Database standards.

| Actions | Target date for completion | Lead | Measurable Outcome |
|---|---|---|---|
| Monitor performance against National Hip Fracture Database standards and ensure improvement where required. | April 2013 | NHS Wiltshire Commissioning Acute providers | Monthly performance meetings (already in place).<br><br>Data to form part of annual update to HIP. |
| Ensure recommendations within RCP audit are usual practice for inpatient providers. This includes the use of a care bundle approach to the initial management of hip fracture patients and recording pre-admission functional ability, mobility and social support as routine for all hip fracture patients on admission using standardised documentation. | April 2013 | Acute providers | To be developed. |

5. Raise awareness of osteoporosis and falls with older people, their carers, staff who work with them and other health care providers, including the promotion of healthy lifestyles.

| Actions | Target date for completion | Lead | Measurable Outcome |
|---|---|---|---|
| Staff training and public awareness campaigns to raise awareness of the risk and protective factors for falls and osteoporosis with older people, their carers and staff who work with them. This will include working with local voluntary agencies. | November 2012 | Public Health | Training plan for health and social care, and care home staff. Campaign for falls awareness week (June 2012). Communication plan |
| All older people in contact with primary or social care professionals should be asked routinely whether they have fallen in the past year and asked about the frequency, context and characteristics of the fall/s. This should trigger further assessment according to the falls pathway. | July 2012 | Primary care Wiltshire council | Referrals to WCHS. |
| Promote physical activity and a healthy diet amongst older people, including working with local voluntary organisations. Introduce short educational talks into community exercise groups. | April 2013 | Wiltshire Council Public Health Primary Care | To be developed. |
| Record patients' views of the falls and bone health service using questionnaires and/or interviews. | April 2013 | GWH community service | To be developed. |
| Ensure that data relating to action plan are regularly collected, monitored at timely intervals and reported appropriately to enable change to occur where required. | April 2013 | Public Health | Annual report to Health and Wellbeing Board on hip and fragility fracture rate, monitoring number of bed days relating to falls admissions amongst people aged over 75 and calculating serious injurious falls rate against activity. |

**Wiltshire Council**
**Cabinet**

**19 June 2012**

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Subject: **Business Plan Annual Update**

Cabinet Member: **Councillor John Brady - Finance, Performance and Risk**

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**Purpose of Report**

1. In February 2011 Wiltshire Council published its four year Business Plan, which set out what would be achieved by 2015 and our approach to savings and investments to make that happen. This paper is a progress report on 2011/12, the first year of that plan.

2. It provides:

   ▪ An update on progress against the priorities set out in the Plan;

   ▪ Performance indicators for Community Results and Council Performance for 2011/12 (Annex 1); and

   ▪ The status of the Council's main programmes (Annex 2);

   ▪ An update on the Council's workforce (Annex 3).

**Background**

3. Wiltshire Council's vision is **to create stronger and more resilient communities**, where communities can solve problems locally with our support. This vision is supported by our goals:

   ▪ Provide high quality, low cost, customer focussed services

   ▪ Ensure local, open and honest decision making

   ▪ Working with our partners to support Wiltshire's Communities.

4. The Business Plan identified the following priorities and a progress report on each of these is summarised in the main body of this report.

   ▪ **Protect** and safeguard vulnerable adults and children, and mitigate the potential impact of job losses on Wiltshire

   ▪ **Invest** in priority services and helping communities to help themselves

   ▪ **Save** to allow us to protect and invest and meet cuts in government grants, whilst keeping the council tax low.

5. In February 2012 the Council agreed its Financial Plan for 2012/13. The financial plan forms part of the Business Plan, and provided an update on the financial situation and updated the financial plan and budgets for 2012/13. The paper explained that the Business Plan itself would not be changed as it remained focussed on the right priorities. The updated financial plan may be found at:

   http://www.wiltshire.gov.uk/council/howthecouncilworks/budgetsandspending.htm

**Main Considerations for the Council**

6.      The first year of the Business Plan ended on 31ˢᵗ March 2012 and progress on each of our priorities is shown below.  This report also provides an update on the transfer of Public Health to councils.

7.      Performance against targets is shown in the **Community and Council Scorecards** at Annex 1.  Most indicators have hit their target or are very close to their targets.  Ten indicators are flagged as 'red', these are:

   • **2001** 5% increase in children in care receiving high quality local placements
   • **2005** More children in care get A*-C GCSEs (or equivalent)
   • **2007** Care leavers in suitable education, jobs or training
   • **2008** Timely adoptions
   • **4001** Help create 6,000 additional jobs by March 2015 (ave. 450 pa)
   • **4003** Reduce the roads maintenance backlog by 10% by March 2015 (£)
   • **5001** Customer telephone call connection rates
   • **6001** Alcohol related hospital admissions
   • **V2** Reduce health inequalities – males
   • **V2** Reduce health inequalities – females

8.      Comments to show the reasons why these have not reached their targets are given in Annex 1 of this report.

9.      The graph below shows that of the 21 indicators that have hit their Year End target seven are our priority indicators (coloured blue).  One of our priority indicators falls within 5% of its target and so is at an amber category and, of the ten indicators that are not on target, three are our priority indicators.
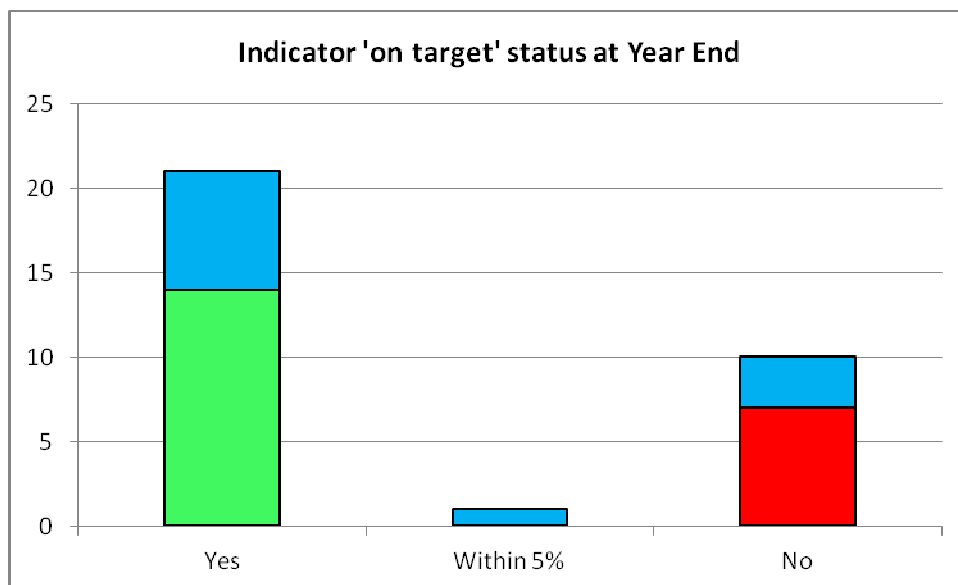


10.     Annex 2 shows the status of the Council's main programmes.  All Corporate Programmes are using SharePoint 2010 as the corporate tool to deliver programmes and projects across Wiltshire Council.  This means that all documentation is consistent and held in a central place with monthly reports produced showing the status of the programmes and projects.

11.     Annex 3 gives information about the Council's workforce and changes over the last year.  During the 2011/12 financial year the Full Time Equivalents (FTE) total across Wiltshire Council decreased by 211.  Service reviews have also led to the FTE of managers being reduced by 104, increasing the ratio of employees per manager to 1:9, which is an improvement from the target of 1:6

last year. Comparing the 2011/12 year with the 2010/11 year, sickness levels decreased by 0.2 FTE days to 8.7 FTE days, which is also in line with the lowest quartile of sickness rates seen across local government.  Voluntary turnover remained in line with that of last year meaning the authority has managed to retain staff at a competitive rate despite making significant changes.  Wiltshire Council also made a total saving of £719,956.44 due to employee hour changes during the financial year.

**Business Plan update 2011/12 - Progress on benefits and outcomes**

12.	This section highlights performance and trends for the key benefits and outcomes we set out to achieve over the period of the business plan (2011/12 to 2014/15).  These are from the middle pages of the Business Plan summary and page 4 of the full Business Plan.  Further information on these and for other indicators used to support the plan are shown in scorecards in Annex 1.

*Protect and safeguard vulnerable adults and children, and mitigate the potential impact of job losses on Wiltshire*

| **ID 3001: 14% increase in the number of older people receiving our services - advice and services for the rising number of older people** | |
|---|---|
|   *2011/12 Target: 9,069* <br> ⬛ On target   ⬛ Not on target | In 2011/12 9,283 people received our services, against a target of 9,069. |
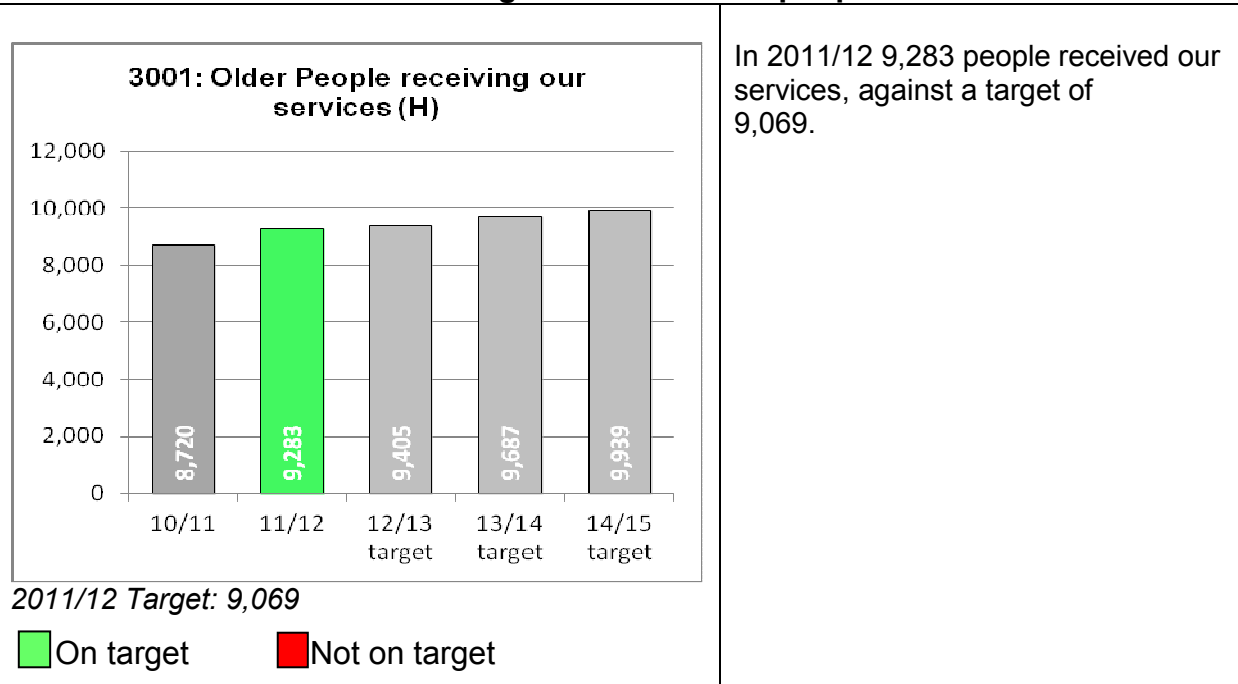
**ID 2001: 5% increase in children in care receiving high quality local placements - use of in-house foster carers (proportion nights)**
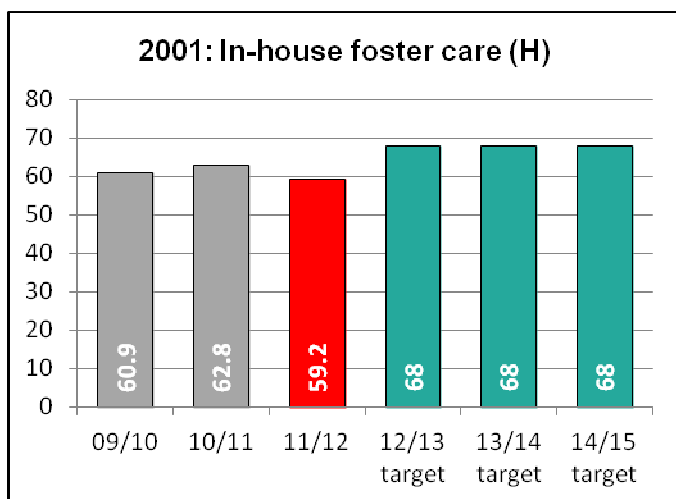


*2011/12 Target: 67.4*

🟩 On target     🟥 Not on target

Reflective of the national picture Wiltshire has a shortage of foster carers who undertake the invaluable role of caring for Wiltshire's looked after children and young people. We are increasing the number of approved fostering households, overall bed capacity and filled beds, and decreasing the number of vacant and unavailable beds. Formally deregistering non active carers and retirement of some long established carers (carers now in their 70s) has seen a loss of mainstream carers/beds. The % of LAC accommodated in-house is being maintained rather than increased. There continues to be a lack of vacant capacity within in-house provision. The total number of inquiries from people interested in becoming foster carers over the past 3 months was 54 and 13 fostering households were approved with others still in the process. There is currently a campaign to recruit more foster carers and this is proceeding well.

In May, there was a fostering event to promote new fostering recruitment materials and a young person's children in care DVD which is helpful for young people but also shows foster carers talking about their experiences which will inspire those considering becoming foster carers. The event also included the launch of a new Foster Carers' Charter which sets out clear principles on how foster carers should be treated, the roles and responsibilities of foster carers, and emphasised the pivotal role played by foster carers in transforming children's lives and helping them achieve their full potential.

**ID 4001: Help create 6,000 additional jobs by Mar 2015**
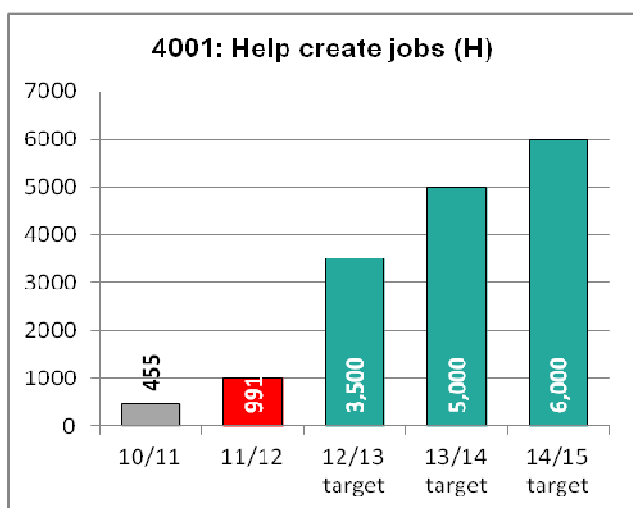


*2011/12 Target: 1,500*

🟩 On target     🟥 Not on target

Note: This target is "cumulative" so figures are added together year on year from 2011/12 to the end of the business plan period in 2014/15. The result for 2010/11 is outside this period so is not added into the total.

2011/12 has been a successful year in securing new investment for Wiltshire, despite the continued slow nature of the economic recovery and cautiousness on the part of business investors nationally.

Successes in 2011/12 include the support given to:

- Welton Bibby & Baron (Europe's largest paper bag manufacturer): 300 jobs; plus a further 70 jobs subject to planning permission.
- Wales & West Utilities: 50 jobs
- Korean owned automotive manufacturer, DTRVMS to secure £3.1m in Regional Growth Fund grant
- Secure 189 jobs through the creation of apprenticeships and the Wiltshire Works programme.

Although the target was not met, 2,950 new jobs are in the pipeline from 33 businesses. These, with jobs expected

| | through the new Incubation Environments Programme, Rural Growth Network, Business Support Programme and increased inward investment promotion (over 670), mean that we are on track for 2012/13. |
|---|---|

**ID 4002: Help safeguard 8,000 existing jobs by Mar 2015**
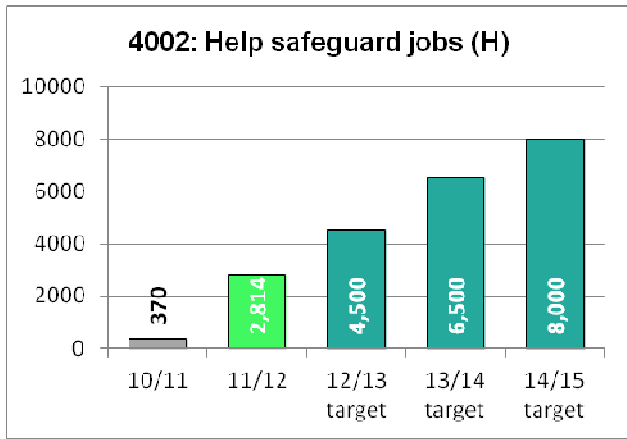
| | 2,500 of the jobs safeguarded relate to the success in securing Defence Technical Training jobs for RAF Lyneham.  Defence Technical Training will provide training for all three armed services in Aeronautical Engineering, Electro-Mechanical Engineering and Communications & Information Systems and will help secure a sustainable future for the Lyneham site and the surrounding community. |
|---|---|
| *2011/12 Target: 2,000* | |
| 🟩 On target        🟥 Not on target | |
| Note: This target is "cumulative" so figures are added together year on year from 2011/12 to the end of the business plan period in 2014/15.  The result for 2010/11 is outside this period so is not added in to the total – it is provided to give a more rounded picture. | |

13.     Delivery on the following indicator commences April 2012 so does not have data to graph.

**ID 1002: 85% premises able to access superfast broadband by Dec 2015**

The Wiltshire Online initiative intends to deliver improved infrastructure development, better access to online services and to increase the digital literacy of home and business users.  The Council has committed to invest £16 million in the project and has been successful in receiving an additional £4.6 million from Government.  The Invitation to Tender for the procurement will be launched once BDUK has finalised the national framework for superfast broadband.  The launch of the framework is dependent on the European Commission approving that the framework contract is compatible with State Aid regulations.  The target date is to award contract in August. Part of their contract will be the requirement to also invest in the project, which will be negotiated before they begin work in September.  Rollout of improved broadband is due to begin at the end of the year.

14.     The following is a statement on the transition of Public Health.

**Update on Public Health**

Plans have been developed to transfer Public Health to the Council.  Much of this will be done during the year, with the aim to facilitate a smooth transfer of Public Health staff and activities to the Council by April 2013.  The new role for Public Health and Wiltshire Council means that we are joining up all our public protection services for the residents of Wiltshire and it will enable us to deliver these services more efficiently and effectively.  We believe our integrated model will bring together existing plans to improve the health of the local population.

## *Invest in priority services and helping communities to help themselves*

### ID 4003: Reduce the roads maintenance backlog by 10% by Mar 2015 (£)

**4003: Roads maintenance backlog (L)**
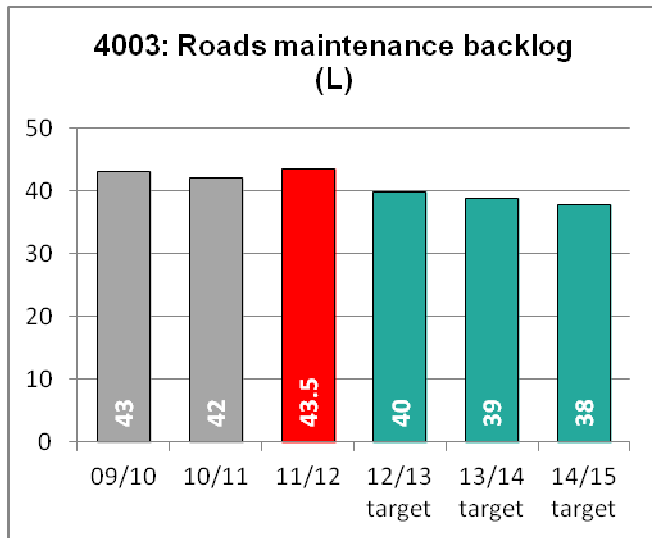


*2011/12 target: £40.9m*

■ On target   ■ Not on target

The target to reduce the backlog to £40.9m was not met (actual £43.5m). The increase in the backlog of highway maintenance is mainly because of the effects of recent winters on the unclassified minor road network. Although the winter of 2011/12 has been less severe, the two previous winters caused extensive damage to the roads which is still emerging. There have still been a large number of pothole repairs required this winter, but the number has been considerably less than in the previous two winters. There has been an extensive programme of carriageway repairs and resurfacing, which has continued through the winter, and a large programme of works is planned for 2012/13 to address those sites most in need of treatment.

### ID 4004: Recycle 50% of our waste by Mar 2015

**4004: Recycle household waste (H)**
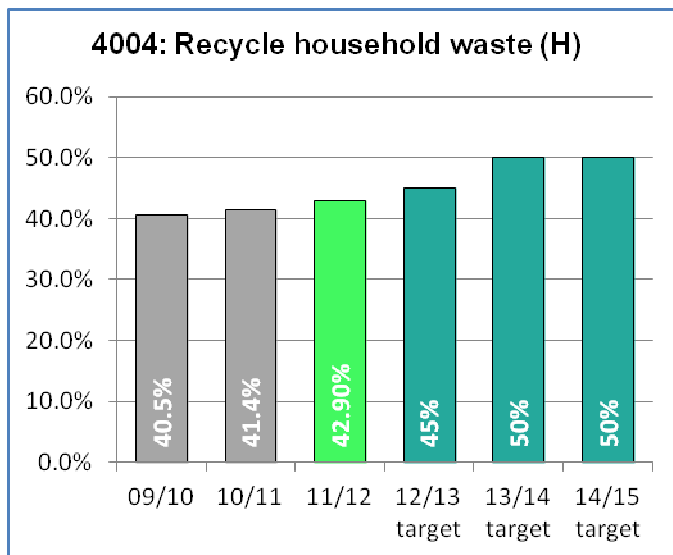


*2011/12 target: 41.5%*

■ On target   ■ Not on target

The target of 41.5% was met (actual 42.9%). During the year there were some concerns, but performance was improved by the warmer Autumn weather which helped maintain a healthy composting tonnage, and the success of the new plastic bottle and cardboard collections which started in November. The results are a 1.5% increase on 2010/11.

**ID 4005 Reduce waste being landfilled to 25% by Mar 2015**



**4005: Landfill waste (L)**

| Year | Value |
|------|-------|
| 09/10 | 47.2% |
| 10/11 | 37.5% |
| 11/12 | 36.6% |
| 12/13 target | 35% |
| 13/14 target | 30% |
| 14/15 target | 25% |

*2011/12 target: 37%*

☐ On target     ☐ Not on target
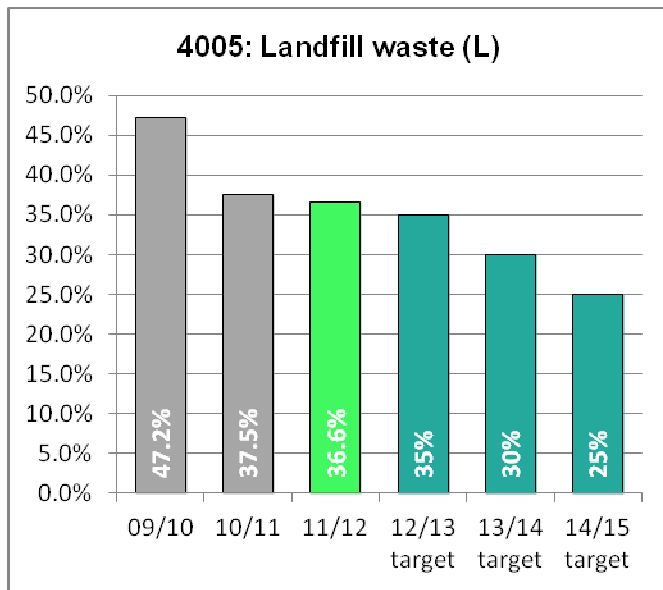
The target of 37% was met (actual 36.6%). Performance reflects the Impact of the Energy from Waste (EfW) plant and the new plastic bottle and cardboard collections.

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**ID 3004: 1,800 new affordable homes by Mar 2015 (ave 450 pa)**



**3004: New affordable homes (H)**

| Year | Value |
|------|-------|
| 09/10 | 554 |
| 10/11 | 648 |
| 11/12 | 626 |
| 12/13 target | 900 |
| 13/14 target | 1,350 |
| 14/15 target | 1,800 |

*2011/12 target: 450*

☐ On target     ☐ Not on target

Note: This target is "cumulative" so figures are added together year on year from 2011/12 to the end of the business plan period in 2014/15. The results for 2009/10 and 2010/11 fall outside this period so are for single years only (not added in to the total) – these results are provided to give a more rounded picture.

The target is based on an average of 450 per year and was exceeded in 2011/12, the first year of the business plan (actual 626).

This target is supplemented by **ID 3005: Affordable homes include 250-350 for rent from PFI**. In 2011/12 the PFI agreement was signed so results will begin from 2012/13.

**ID 4006: Lower our carbon emissions from April 2010 to Mar 2015 by 11,823 tCO2**

The target is to reduce the council's carbon emissions by 11,823 tCO2 by March 2015, and interim annual targets have not been set so there in no on target/off target assessment for the year.  In 2011/12 we achieved a reduction of 1,118 tCO2.  Work is underway to identify further projects to enable us to meet our medium term target.  A capital investment project was approved in January 2012 relating to convert schools on oil boilers to biomass boilers. This project is underway and is expected to be completed by November 2013.

*(As there are no interim targets yet there is not enough data to create a graph here)*

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**ID 2003: 5% more 11 year olds will get Key Stage 2 L4+ by 2015 (Maths and English)**



**2003: KS2 Level 4+ (Maths and English) (H)**

| 09/10 | 10/11 | 11/12 | 12/13 target | 13/14 target | 14/15 target |
|-------|-------|-------|--------------|--------------|--------------|
| 71 | 75 | 75 | 76 | 77 | 79 |

*2011/12 target: 75*

🟩 On target   🟥 Not on target
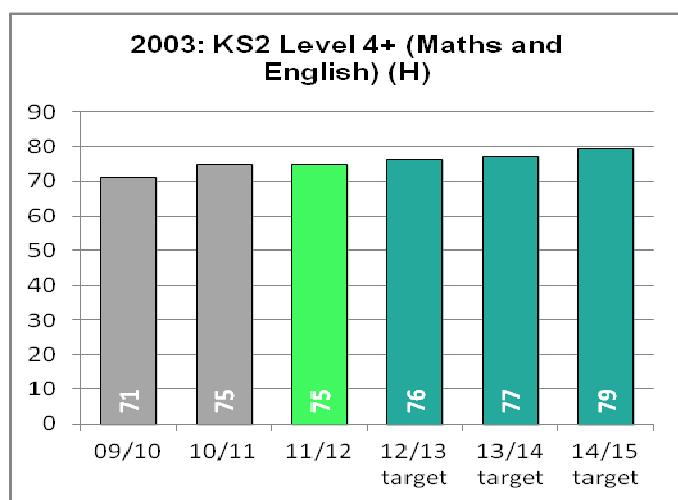
The target for 2011/12 was met.

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**ID 2004: 5% more young people will get 5 A*-C at GCSE by 2015 (including English and Maths)**



**2004: 5 A*-C GCSEs (H)**

| 09/10 | 10/11 | 11/12 | 12/13 target | 13/14 target | 14/15 target |
|-------|-------|-------|--------------|--------------|--------------|
| 55.4 | 55.8 | 60.3 | 57.6 | 58.6 | 60.6 |

*2011/21 target: 56.6*

🟩 On target   🟥 Not on target
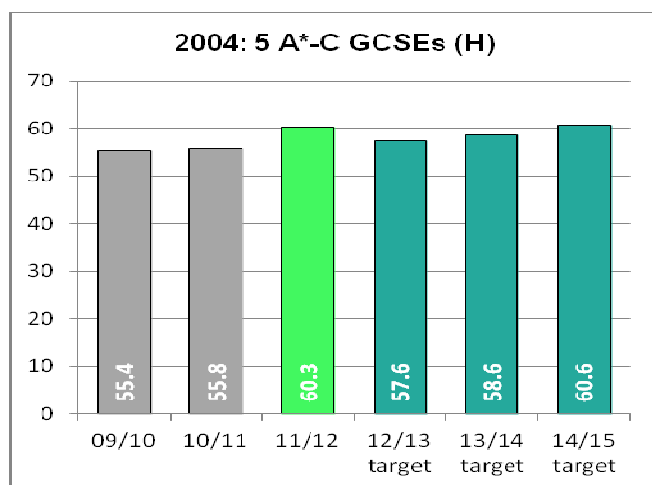
The target of 56.6% was exceeded (actual 60.3%).

Future targets will be reassessed in the light of good progress.

*Save to allow us to protect and invest and meet cuts in government grants, whilst keeping the council tax low.*

15.   The financial plan for 2012/13 has been updated and was agreed at full council in February. The full document, including detailed explanations of planned savings and investments and information on progress, may be found at: http://www.wiltshire.gov.uk/council/howthecouncilworks/budgetsandspending.htm

16.   The council did not increase council tax for people in Wiltshire for 2012/13.

## Environmental Impact of the Proposal

17.   This is a progress report so the proposal has no direct environmental impact, although there are measures on Recycling, Waste Management and Energy Efficiency.

## Equalities Impact of the Proposal

18.   As this is a progress report the proposal has no direct impact on equalities.

## Risk Assessment

19.   The Council's risk management arrangements apply across the Council's services and risk is overseen by the Corporate Risk Management Group (CRMG), which reports on significant risks to CLT and to the Audit Committee. No risks arise as a result of this report, but it does highlight progress on achieving targets and delivering the Council's main programmes.

## Financial Implications

20.   This is a progress report so has no direct financial implications. The Council's financial plan that forms part of the Business Plan was updated in February 2012 as part of budget setting for 2012/13.

## Legal Implications

21.   As this is a progress report there are no direct legal implications.

## Options Considered

22.   As this is a progress report there are no 'options to consider'.

## Proposal

23.   Cabinet is asked to note progress against the Business Plan.

**Paul Mountford**
**Head of Policy, Performance and Corporate Business Management**

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Date of report: 6th June 2012

**Background Papers**
The following unpublished documents have been relied on in the preparation of this report: detailed performance management information held within services.

**Appendices**
Annex 1: Business Plan Scorecards
Annex 2: Programme Status
Annex 3: Workforce Report

**MEASURES TO YEAR END**

| Ref | Wiltshire's Business Plan 2011-15 COMMUNITY RESULTS SCORECARD | high/low | 2009/10 Actual | 2010/11 Actual | 2011/12 Target (year) | 2011/12 Actual to Year End | On target? | 3 yr trend | 2012/13 target | 2013/14 target | 2014/15 target | Lead officer |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | **Living in Wiltshire** | | | | | | | | | | | |
| 1001 | Percentage of people satisfied with their local area | H | 86.4% | no survey | Baseline to be set - new survey | 90% | - | I | | | | Maggie Rae |
| | **Protect and Safeguard Vulnerable Children** | | | | | | | | | | | |
| 2001 | 5% increase in children in care receiving high quality local placements: use of in-house foster carers (proportion nights) | H | 60.9 | 62.8 | 67.4 | 59.2 | N | W | 68 | 68 | 68 | Fiona Fitzpatrick |
| | **Invest in: Children's Attainment** | | | | | | | | | | | |
| 2003 | 5% more 11 year olds will get Key Stage 2 L4+ by 2015 (Maths and English) | H | 71 | 75 | 75 | 75 | Y | I | 76.2 | 77.2 | 79.2 | Stephanie Denovan |
| 2004 | 5% more young people will get 5 A*-C at GCSE by 2015 (including English and Maths) | H | 55.4 | 55.8 | 56.6 | 60.3 | Y | I | 57.6 | 58.6 | 60.6 | Stephanie Denovan |
| | **Protect and Safeguard Vulnerable adults** | | | | | | | | | | | |
| 3001 | 14% increase in the number of older people receiving our services - advice and services for the rising number of older people | H | | 8,720 | 9,069 | 9,283 | Y | - | 9,405 | 9,687 | 9,939 | James Cawley |
| | **Invest in: Our Communities** | | | | | | | | | | | |
| 3003 | Level of participation in regular volunteering | H | 29.9% | no survey | Baseline to be set - new survey | 28% | - | W | | | | Niki Lewis |
| | **Invest in: Housing** | | | | | | | | | | | |
| 3004 | 1,800 new affordable homes by Mar 2015 (ave 450 pa) | H | 554 | 648 | 450 | 626 | Y | I | 450 | 450 | 450 | James Cawley |
| | **Economy and Unemployment** | | | | | | | | | | | |
| 4001 | Help create 6,000 additional jobs by Mar 2015 | H | | 455 | 1,500 | 991 | N | - | 2,000 | 1,500 | 1,000 | Alistair Cunningham |
| 4002 | Help safeguard 8,000 existing jobs by Mar 2015 | H | | 370 | 2,000 | 2,814 | Y | - | 2,500 | 2,000 | 1,500 | Alistair Cunningham |

| | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **MEASURES TO YEAR END** | | | | | | | | | | | | |
| Ref | **Wiltshire's Business Plan 2011-15 COMMUNITY RESULTS SCORECARD** | high/low | **2009/10** Actual | **2010/11** Actual | **2011/12** Target (year) | **2011/12** Actual to Year End | On target? | 3 yr trend | **2012/13** target | **2013/14** target | **2014/15** target | **Lead officer** |
| | **Invest in: Highways** | | | | | | | | | | | |
| 4003 | Reduce the roads maintenance backlog by 10% by Mar 2015 (£) | L | £43m | £42m | £40.9m | £43.5m | N | W | £39.9m | £38.8m | £37.8m | Parvis Khansari |
| | **Invest in: Waste Management** | | | | | | | | | | | |
| 4004 | Recycle 50% of our waste by Mar 2015 | H | 40.5% | 41.4% | 41.5% | 42.9% | Y | I | 45% | 50% | 50% | Tracy Carter |
| 4005 | Reduce waste being landfilled to 25% by Mar 2015 | L | 47.2% | 37.5% | 37% | 36.6% | Y | I | 35% | 30% | 25% | Tracy Carter |
| | **Invest in: Energy Efficiency** | | | | | | | | | | | |
| 4006 | Lower our carbon emissions from April 2010 to Mar 2015 by 11,823 tCO2 | H | baseline | 742 reduction | no annual targets | 1,118 reduction | A | - | | | 11, 823 tCO2 reduction | Alistair Cunningham |
| | **Public Health measures** | | | | | | | | | | | |
| V1 | Life expectancy – males (yrs) | H | 79.3 | 79.5 | 79.9 | 79.6 | Y | I | 80.2 | 80.5 | | Maggie Rae |
| V1 | Life expectancy – females (yrs) | H | 83.3 | 83.5 | 83.7 | 83.7 | Y | I | 84 | 84.3 | | Maggie Rae |
| V2 | Reduce health inequalities – males (yrs between most and least deprived) | L | 5.1 | 5.8 | 4.56 | 6.6 | N | W | 4.56 | 4.52 | 4.47 | Maggie Rae |
| V2 | Reduce health inequalities – female (yrs between most and least deprived) | L | 3.4 | 3.9 | 2.96 | 3.8 | N | W | 2.96 | 2.92 | 2.84 | Maggie Rae |

## Comments on Community Results Scorecard

**Results that are not on target (No)**

**Ref 2001 – 5% increase in children in care receiving high quality local placements: use of in-house foster carers (proportion nights)**
**Target: 67.4, Actual: 59.2**
**Reason not on target and what we are doing:**

Reflective of the national picture Wiltshire has a shortage of foster carers who undertake the invaluable role of caring for Wiltshire's looked after children and young people. We are increasing the number of approved fostering households, overall bed capacity and filled beds, and decreasing the number of vacant and unavailable beds. Formally deregistering non active carers and retirement of some long established carers (carers now in their 70s) has seen a loss of mainstream carers/beds. The % of LAC accommodated in-house is being maintained rather than increased. There continues to be a lack of vacant capacity within in-house provision. The total number of inquiries from people interested in becoming foster carers over the past 3 months was 54 and 13 fostering households were approved with others still in the process. There is currently a campaign to recruit more foster carers and this is proceeding well. In May, there was a fostering event to promote new fostering recruitment materials and a young person's children in care DVD which is helpful for young people but also shows foster carers talking about their experiences which will inspire those considering becoming foster carers. The event also included the launch of a new Foster Carers' Charter which sets out clear principles on how foster carers should be treated, the roles and responsibilities of foster carers, and emphasised the pivotal role played by foster carers in transforming children's lives and helping them achieve their full potential.

**Ref 4001: Help create 6,000 additional jobs by Mar 2015**
**2011/12 Target: 1,500, Actual: 991**
**Reason not on target and what we are doing:**

2011/12 has been a successful year in terms of securing new investment for Wiltshire although the fact that the number of jobs created (991) is below target reflects the continued slow nature of the economic recovery and cautiousness on the part of business investors nationally. Notable successes in 2011/12 include the support given to Europe's largest paper bag manufacturer, Welton Bibby & Baron and Wales & West Utilities that have committed to bring 300 and 50 jobs to Westbury respectively. Welton Bibby & Baron expect to create a further 70 jobs subject to the outcome of a current planning application for an extension. New jobs have also been secured following a successful application to the Government for £3.1 million in Regional Growth Fund grant funding (supported by the Council) by Korean owned automotive manufacturer, DTRVMS. The company is to develop a new Research & Development, logistics and manufacturing facility in Wiltshire. In addition, 189 jobs have been secured through the creation of apprenticeships and the Wiltshire Works programme.

The RAG status has been identified as Red. However, there are a number of new jobs that are in the pipeline i.e. 2950 within 33 businesses that the service has been working with and which are expected to commit to new investment over the next 12 months. If these jobs are added to those that the Council will deliver through the new Wiltshire Incubation Environments Programme, Rural Growth Network, Wiltshire Business Support Programme and increased inward investment promotion (in excess of 670), the service will catch up and ultimately achieve the targets set.

**Ref 4003:** **Reduce the roads maintenance backlog by 10% by Mar 2015 (£)**
**2011/12 Target: £40.9m, Actual: £43.5m**
**Reason not on target and what we are doing:**

The increase in the backlog of highways maintenance is mainly because of the effects of recent winters on the unclassified minor road network. Although the winter of 2011/12 has been less severe, the two previous winters caused extensive damage to the roads which is still emerging. There have still been a large number of pothole repairs required this winter, but the number has been considerably less than in the previous two winters. There has been an extensive programme of carriageway repairs and resurfacing, which has continued through the winter, and a large programme of works is planned for 2012/13 to addresses those sites most in need of treatment.

**Ref V2 – Reduce Health Inequalities – males, Target: 4.56, Actual: 6.6**
**Ref V2 – Reduce Health Inequalities – females, Target: 2.96, Actual: 3.8**
**Reason not on target and what we are doing:**

Although Wiltshire is generally not a deprived area, it has pockets of deprivation including five local areas that lie amongst the 20% most deprived in England.  In addition, aspects of rural deprivation are difficult to quantify yet are of particular relevance in this county.  Life expectancy is 6 years lower for men and 4 years lower for women in the most deprived areas of Wiltshire than in the least deprived areas.   This is low compared to other areas (both within the SW and nationally) but, nevertheless, represents clear inequalities in health outcomes within the local population.

Many major conditions are strongly correlated to deprivation as are the lifestyles that contribute to them.  Among the interventions that are evidenced to reduce the life expectancy gap are smoking cessation; statin therapy, use of anti hypertensives and early detection of cancer. The transfer of Public Health responsibilities to Wiltshire Council in April 2013 and ring fenced budgets will keep a focus on health inequalities.

We have recently produced health inequality data at community area level and included this within the new JSAs for community area. This has increased the awareness of health inequalities in communities and each community is in the process of agreeing priorities to improve the health of the local population.

**Results with some concern (Amber)**

**Ref 4006 – Lower our carbon emissions from April 2010 to March 2015 by 11,823 tCO2**
**Target: no annual target, Actual: 1,118 reduction**
**Reason for concern and what we are doing:**
As reported last quarter there is currently a recognised shortfall in achieving the target by 2014, and Cross-Directorate work is underway (eg with the ECO Team, Property Services, Transformation Programme, ICT, Streetlighting, Fleet) to identify further projects.  A capital investment project was approved in January 2012, which would potentially contribute a further 10% of the corporate target – and reduce the projected performance shortfall – through converting schools on oil boilers to biomass boilers.  This project is now underway and is expected to be completed by November 2013.

| | | high/low | 2009/10 Actual | 2010/11 Actual | 2011/12 Target (year) | 2011/12 Actual to Year End | On target? | | 2012/13 target | 2013/14 target | 2014/15 target | Lead officer |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **MEASURES TO YEAR END** | | | | | | | | | | | | |
| Ref | **Wiltshire's Business Plan 2011-15 COUNCIL PERFORMANCE SCORECARD** | | | | | | | | | | | |
| | **Overall** | | | | | | | | | | | |
| 1003 | Percentage of people satisfied with the council | H | 37.9% | No survey | Baseline to be set - new survey | 55.9% | - | I | | | | Maggie Rae |
| | **Protect and Safeguard Vulnerable Children** | | | | | | | | | | | |
| 2005 | More children in care get 5 A*-C GCSEs (or equivalent) | H | 14.3% | 16% | 20% | 4% | **N** | W | 25% | 28% | 32% | Fiona Fitzpatrick |
| 2006 | Care leavers in suitable accommodation | H | 76.5% | 97.1% | 95% | 94.7% | Y | I | 95% | 95% | 95% | Fiona Fitzpatrick |
| 2007 | Care leavers in suitable education, jobs or training | H | 41.2% | 65.7% | 68% | 39.5% | **N** | W | 72% | 72% | 72% | Fiona Fitzpatrick |
| 2008 | Timely adoptions | H | 92.9% | 100% | 90% | 68% | **N** | W | 90% | 90% | 90% | Fiona Fitzpatrick |
| 2009 | Safeguarding: initial assessments done in 10 days | H | 65.1% | 73.0% | 70% | 88% | Y | I | 80% | 80% | 80% | Fiona Fitzpatrick |
| 2010 | Safeguarding: child protection plan reviewed on time | H | 97.9% | 100% | 100% | 100% | Y | I | 100% | 100% | 100% | Fiona Fitzpatrick |
| | **Invest in: Our Communities** | | | | | | | | | | | |
| 3007 | Number of volunteers in the library service | H | new | new | 325 | 670 | Y | - | 325 | 325 | 325 | Niki Lewis |
| | Opening hours (per week) supported by volunteers at Level 2 libraries | H | new | new | 94 | 135 | Y | - | 94 | 94 | 94 | Niki Lewis |
| | Opening hours (per week) supported by volunteers at Level 3 libraries | H | new | new | 34 | 46 | Y | - | 34 | 34 | 34 | Niki Lewis |
| 3008 | Satisfaction with area boards | H | n/a | 45% | 50% | 53% | Y | - | 55% | 60% | 65% | Niki Lewis |
| | **Economy and Unemployment** | | | | | | | | | | | |
| 4009 | Number of  businesses assisted | H | | | 625 | 750 | Y | - | 625 | 625 | 625 | Alistair Cunningham |
| 4010 | Number of people helped with skills (T) or placed into work (W) | H | 669 (T) | 1046 (T) 435 (W) | 2073 (T) | 2299 (T) 310 (W) | Y | I | tbc | tbc | tbc | Alistair Cunningham |
| | **Invest in: Leisure Services** | | | | | | | | | | | |
| 4012 | The number of visits to our leisure centres (000) | H | 3,431 | 3,364 | 3,040 | 3,163 | Y | W | 3,487 | 3,545 | 3,585 | Mark Smith |

| | | high/low | 2009/10 Actual | 2010/11 Actual | 2011/12 Target (year) | 2011/12 Actual to Year End | On target? | | 2012/13 target | 2013/14 target | 2014/15 target | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **MEASURES TO YEAR END** | | | | | | | | | | | | |
| Ref | Wiltshire's Business Plan 2011-15 COUNCIL PERFORMANCE SCORECARD | | | | | | | | | | | Lead officer |
| | **Invest in: Highways** | | | | | | | | | | | |
| 4011 | The average days taken to repair a pothole | L | 13 | 5.2 | 10 | 8.6 | Y | I | 10 | 10 | 10 | Mark Smith |
| | **Other** | | | | | | | | | | | |
| 1004 | The percentage of budgeted savings achieved | H | | | 100% | 100% | Y | - | 100% | 100% | 100% | Michael Hudson |
| 5001 | Customer telephone call connection rates of 95%+ | H | | 92.6% | 95%+ | 88.3% | N | | 95%+ | 95%+ | 95%+ | Jacqui White |
| | **Public Health measures** | | | | | | | | | | | |
| 6001 | Hospital admissions - alcohol related (/100,000) | L | 1,390 | 1,621 | 1,400 | 1,615 | N | W | 1,350 | | | Maggie Rae |
| 6002a | Proportion 4-5 year olds with healthy weight | H | 78.9% (CI +/- 1.2%) | 76.8% (CI +/- 1.2%) | Not yet profiled | 78.2% (CI +/- 1.2%) | - | - | | | | Maggie Rae |
| 6002b | Proportion 10-11 year olds with healthy weight | H | 70.5% (CI +/- 1.4%) | 68.9% (CI +/- 1.4%) | Not yet profiled | 68.7% (CI +/- 1.4%) | - | - | | | | Maggie Rae |

**Comments on Council Performance Scorecard**

**Results that are not on target (No)**

**Ref 2005 – More children in care get 5 A\*-C GCSEs (or equivalent)**
**Target: 20%, Actual: 4%**
**Reason not on target and what we are doing:**
Of the 5 young people in Summer 2011 with potential to achieve 5 A\*-C inc. English & Maths, 1 has achieved. Of the remaining 4, 1 is only in year 10 and will sit exams in 2012; 1 had a personal crisis just prior to exams and avoided permanent exclusion; and the remaining 2 each narrowly missed a grade 'C' in English and Maths respectively. All are currently in Education Employment or Training. The Academic Mentoring programme is to be relaunched in 2011/12 to target Year 11 in the lead up to exams.

Ofsted's recent inspection of Safeguarding and Looked After Children Services reported "The contribution of services to helping looked after children and young people enjoy and achieve is good. Strong collaborative working between the virtual school, social workers and teachers and a shared vision to give all looked after children and young people a positive and successful school experience are common features of the work in Wiltshire. The virtual school has had a positive impact on the improving educational inclusion, attendance, progress and attainment."

Predictions for the 2012 cohort of children in care getting 5 A\*-C GCSEs (or equivalent) is 14%.

**Ref 2007 – Care leavers in suitable education, jobs or training**
**Target: 68%, Actual: 39.5%**
**Reason not on target and what we are doing:**
We have increased the frequency of tracking and contacting those disengaged (now monthly). The LAC Education Employment or Training Monitoring Group meets monthly to discuss all cases and highlights issues and actions. A mentoring programme started in January 2012. Apprenticeships and work based training programmes are coming on-line over the next few weeks and opportunities through Care2Work will be available from April. Future plans include the proposed dedicated LAC centre which will be a base for a wide range of activities and training opportunities for young people.

The 2012/13 cohort of care leavers in suitable education, jobs or training is currently at 58%.

**Ref 2008 – Timely adoptions**
**Target: 90%, Actual: 68%**
**Reason not on target and what we are doing:**
This indicator measures the proportion of children and young people who are adopted within 12 months of the decision being made that adoption is definitely the plan for them. Relatively small numbers are involved so each child adopted impacts significantly on the result. There were 19 children adopted and 13 were within 12 months of the decision that they should be adopted. The reason for the delays has been due to highly specific and complex issues which mean that the process is taking longer to complete. Work is underway to improve the timeliness of adoption this includes implementation of permanency policy, creation of a dedicated "home finder" post, strengthening the role of Independent Reviewing Officers and creation of an adopters reference group to inform practice

**Ref 5001 – Customer telephone call connection rates of 95%**
**Target: 95%, Actual: 88.3%**
**Reason not on target and what we are doing:**
Whilst we have been unable to achieve the agreed target this year, more recently the connection rate has shown a slight upturn. Required savings has meant a considerable reduction in staffing and whilst we have been able to reduce or re-direct some of the demand coming in, the connection rates across last year reflect the impact that the reduction in staff has had. We have also had to deal with some particularly high peaks of customer calls generated from service changes; e.g. the roll out of all the changes in Waste and Recycling. We also still have a large number of unnecessary 'internal' switchboard calls which could be avoided by staff using the contact directory, as well as calls coming through to customer services because customers cannot get through to specific services. We remain focussed on training more staff to deal with specific queues where peaks are affecting the overall % rate.

**Ref 6001 - Hospital admissions - alcohol related (/100,000)**
**Target: 1400, Actual: 1615**
**Reason not on target and what we are doing:**
Both nationally and locally, alcohol related admissions (which are measured using modelled data applied to actual patient numbers) are rising year on year.  Wiltshire has an alcohol strategy currently in its 3rd year which contains a wide range of actions, all of which it is hoped will contribute to changing attitudes to alcohol, preventing some alcohol problems from occurring and ensuring early intervention and treatment is available to those who need it.  This includes actions around education, prevention, awareness raising, support and treatment, and managing the night time economy. The Department of Health has identified high impact changes and resources to fund the following:

- Increased delivery of brief interventions in the community
- Strengthened community specialist services and referral
- Acute trust based alcohol liaison services

**Additional information relating to Economy and Employment**

**Ref 4010: Number of people helped with skills or placed into work**
No annual targets are set for the number of people helped with skills or placed into work.  As projects and contracts develop throughout the year quarterly targets will be set.

## Annex 2: Programme Status

**Key**
- Red - major issue for escalation
- Amber - major issue, mitigation plan in place
- Green - on time, to quality and budget
- Blue - Project complete
- Grey - Suspended
- White - Project not started

| Programme | On Time | On Quality/Performance | On Budget | Resource in place | Overall Status |
|---|---|---|---|---|---|
| Economy & Employment (Investment - Action for Wiltshire) | Green | Green | Green | Green | Green |
| Local Development Framework (LDF) (Investment) | Green | Green | Green | Amber | Green |
| Wiltshire Online (Super-fast broadband) (Investment) | Amber | Green | Green | Amber | Green |
| Campus (Transformation) | Green | Green | Green | Green | Green |
| Cloud Programme *NEW* | Green | Green | Green | Green | Green |
| Development Services Transformation Programme *NEW* | Green | Green | Green | Green | Green |
| Hubs and Depots (Transformation) | Amber | Green | Green | Green | Green |
| Information Services (Transformation) | Green | Green | Green | Green | Green |
| Knowledge Management (Transformation) | Green | Green | Green | Green | Green |
| Localism (Transformation) | Green | Green | Green | Green | Green |
| Procurement (Transformation) | Green | Green | Green | Green | Green |
| SAP Development (Transformation) | Green | Green | Green | Green | Green |
| Service Reviews and Systems Thinking (Transformation) | Green | Green | Green | Amber | Green |
| Strategic Partner and Employee Engagement (Transformation) | Green | Green | Green | Green | Green |
| Waste Transformation (Transformation) | Green | Amber | Green | Green | Green |

**Summary of red issues – there are no red issues for this period**

| | Programme | Project | Issue |
|---|---|---|---|
| Red | | | |

Dr Carlton Brand
Corporate Director, Transformation & Resources
Status: March 2012

## *ANNUAL WORKFORCE REPORT*

Report for Wiltshire Council relating to the 2011 – 2012 financial year.

**Notes on the figures**:

- All reported figures exclude casual employees and agency/professional services staff (unless stated).

- Wiltshire Council figures exclude Fire, Police and Schools

  - **Headcount** = Number of positions that are filled not individual people
  - **FTE** = "Full Time Equivalents" which take into account actual working hours to show accurate staffing levels

- **"Annualised"** means we take the measured amount divide it by the months it covers and multiply it by 12 to give an estimate of the rate that would be seen throughout the year.

- **"YTD"** means year to date i.e. all reportable information since April 2011 has been included.

- The **Voluntary staff turnover** section does not include information for those who leave due to statutory retirement, ill health, compulsory or voluntary redundancy, dismissals, end of contract, unsatisfactory probation and TUPE transfers as these are classified as compulsory reasons. Only Voluntary leavers are included as these are the individuals that have decided to leave for their own reasons and therefore it may not be in Wiltshire's best interest. Overall turnover rates will be higher and can be analysed upon request.

- Although the cost associated with turnover is not readily available, CIPD estimate that the recruitment cost of replacing a leaver is £2,930. Based on last year's turnover rate (11.7%) we could estimate that 617 employee's will leave Wiltshire Council during 2011-12 resulting in costs of **£1,807,810**.

- **% <1 year turnover rate:** The cost of turnover in this group is generally higher as the investment in recruitment, induction and training is unlikely to be recovered within such a short time period.

- **Agency figures** are based on the spend being put through the agency cost centres on SAP & information available from the Comensura system.

- **Redundancy figures** relate to all redundancies made, not just those as part of service reviews.

- The **sickness measure** given is the average number of FTE working days lost by each FTE over the last 12 months, since April 2011.

If you have any queries on these reports or requests for further information, please contact Paul Rouemaine, HR Information Manager, on 01225 756159 or Paul.Rouemaine@Wiltshire.gov.uk

# *ANNUAL WORKFORCE REPORT*

**WILTSHIRE COUNCIL** (excl. schools)     Quarter ended: March 2012

## Management Information Team Observations:

- During the 2011-12 financial year, WC's (Wiltshire Council) headcount decreased by 25 to 5376 (-0.46%), and the FTE decreased by 211 to 4072 (-4.92%). The headcount has not dropped as you may expect, compared to the FTE, as we have now given contracts to many employees in areas such as leisure who were previously seen as casual.

- The FTE of managers has reduced by 104 during the financial year the ratio of employees per manager has increased over the year to 1:9 (was 1:6 last year).

- Comparing the 2010-11 year with the 2011-12 year, sickness levels decreased by 0.2 FTE days. The WC sickness estimate was at its lowest at the end of June 2011 at 7.9 FTE days; there was then a seasonal increase to 8.3 FTE days for the end of September and December, and it then rose again to 8.7 FTE days by the end of the financial year.

- The lowest levels of sickness were observed in Policy, Research, Communications and Corporate Programme Office and Policy, Performance and Partnership at 0.9 and 2.2 days lost respectively.

- 'Cold/flu and other infections' continue to be the most commonly occurring sickness reason with absences lasting for 2.0 days on average.

- Absences for 'stress/depression/mental health/fatigue' last 14.8 days on average and accounts for the second longest average absence length after 'Other - cancer/tumours/growth' (25.9 days on average).

- For under 25s, the largest proportion of all sickness days lost for the year are due to the reason of 'stomach' (20.8%). For all employees over the age of 25, the largest proportion of absence days lost are due to 'stress/depression/mental health/fatigue'.

- The voluntary turnover rate at the end of the financial year was 8.3%. This is in line with the level seen last year.

- Disciplinary and grievance cases show that an average of 12.1 and 8.7 cases took place respectively per 1000 employees for the year; 35% of all disciplinary cases took place in Neighbourhood Services.

- The ratio of starters to leavers was 1:1.5 at the end of the financial year. Finance had the greatest ratio of 1 starter for every 13.8 leavers over the year; this is largely due to 14 employees being TUPE transferred out of internal audit and 14 employees leaving due to voluntary redundancy.

- WC made a total saving of £719,956.44 due to employee hour changes (-34.7 FTE) during the financial year.

# *ANNUAL WORKFORCE REPORT*

This page gives you information relating to important employee measures:

The number of positions that are filled by contracted staff

"Full Time Equivalents" which take into account actual working hours to show accurate staffing levels

## Staffing levels

| Measure<br>Relating to Quarter (unless stated) | March 2012 | Change since April 2011 |
|---|---|---|
| Headcount (as at end of period) | 5376 | -25 |
| FTE (as at end of period) | 4072 | -211 |
| Agency worker use (equivalent number of FTE's used during the year) | 862 | n/a |
| FTE change due to TUPE transfers in vs. out (During 2011-2012) | +81.4 | |
| FTE change due to employee hour changes (During 2011-12) | -34.7 | |
| FTE Ratio of starters to leavers (During 2011-12) | 1:1.5 | |

Part of the FTE/HC change above may be explained by these measures

The number of hour's agency workers were used to cover workload divided by 384 (the number of hours a full time person works in a quarter)

How many leavers we have had for every one starter

The % of leavers who completed an exit interview

## Workforce Information

| Measure | March 2012 | March 2011 |
|---|---|---|
| Ratio of managers to employees | 1:9 | 1:6 |
| % Exit questionnaires completed (YTD) | 14% | 13% |
| % of total vacancies filled by internal appointment - year to date | 46% | 40.8% |
| % management posts filled by internal appointment - year to date | 85% | 0% |
| FTE of managers | 613 | 717 |
| Number of redundancies made during 2011-12 | 235 | |

The % of posts filled by an internal candidate

The FTE of people management posts

The percentage of absences that last for over 20 days (deemed to be long term)

## Sickness Absence

| Measure | 2011-12 | 2010-11 |
|---|---|---|
| Working days lost per FTE | 8.7 days | 8.9 days |
| % of total absences over 20 days | 47.0% | 43.2% |

The number of RIDDOR incidents that have occurred. http://www.hse.gov.uk/riddor/riddor.htm.

## Health and Safety

| Measure | 2011-12 | 2010-11 |
|---|---|---|
| No. of workplace incidents/injuries reported per 1000 employees (ytd annualised) | 2.4 | 1.7 |

The number of individuals that left voluntarily before completing one year service as a percentage of the employees in post with less than one year's service.

## Voluntary Staff Turnover

| Measure | 2011-12 | 2010-11 |
|---|---|---|
| % staff turnover | 8.3% | 8.2% |
| % <1 year turnover rate | 13.5% | 24.5% |
| Average leavers' length of service | 9.4 years | 9.7 years |

## Disciplinary and Grievance Cases

| Measure | 2011-12 | 2010-11 |
|---|---|---|
| New disciplinary cases per 1000 employees | 12.1 | 3.7 |
| New grievance cases per 1000 employees | 8.7 | 1.1 |

# ANNUAL WORKFORCE REPORT

This section gives you Information relating to your workforce costs:

| Employees paid over £50,000 basic salary | | |
|---|---|---|
| **Measure** | **March 2012** | **April 2011** |
| % of employees paid over £50,000 annual salary | 2.01% | 2.34% |
| % of employees paid over £100,000 annual salary | 0.07% | 0.09% |
| % of employees paid over £150,000 annual salary | 0.00% | 0.02% |
| Headcount paid over £58,200 FTE annual salary | 40 | 45 |

Why this is important: Under the Code of Recommended Practice for Local Authorities on Data Transparency we are required to publish salary information for employees earning more than £58,200. Under The Accounts and Audit (England) Regulations 2011 section 7.2.b there is a requirement to publish in the statement of accounts the number of employees earning £50,000 or more.

| Employee costs | | |
|---|---|---|
| **Measure** | **2011-12** | **2010-11** |
| Total paid in salaries to contracted employees 2011-12 | £112,103,793.11 | |
| Total paid in salary to casual employees 2011-12 | £2,917,684.82 | |
| Total salary pay 2011-12 | £115,021,477.93 | |
| Total paid to Agency workers during 2011-12 | £8,687,493.81 | |
| Median employee basic salary (as at end of period) | £19,276.08 | £18,453.00 |

Why this is important: Clear budgetary restraints mean that keeping track of this information is vital. Whilst we are seeing a reduction in contracted employees we may see some services using alternative resourcing options on a more regular basis such as agency workers, consultants or casuals. This information will highlight whether this is happening or not.

The cost or saving made by employee's changing the hours they work →

| Additional financial information | | |
|---|---|---|
| **Measure** | **2011-12** | **2010-11** |
| Cost of sick pay | £2,778,852.07 | £3,108,081.27 |
| ~~Cost~~/**saving** of employee hour changes (Financial year) | £719,956.44 | £828,176.52 |

Why this is important: Sick pay amounted to £2,900,000 across Wiltshire Council during the 2010-11 financial year and therefore this is a substantial area of spend that should be minimised whenever possible. Some services may also be looking to employees to work more hours than they previously have done to cover gaps where a reduction in the headcount of employees has been made. It is therefore important that we keep track of the change in FTE resulting from employees changing their hours.

# *ANNUAL WORKFORCE REPORT*

## BENCHMARK DATA
### Updated with 2011 benchmark data

Benchmark figures are supplied by DLA Piper Benchmarker. The Local Authority benchmarks represent combined data from 54 subscriber Local Authorities. The Private Sector benchmarks represent data from approximately 250 private sector organisations classified as "large" (over 1000 employees), consisting of a mix of Financial, Professional and Support Services; Manufacturing, Engineering and Processing; and Retail and Leisure.

| Sickness Absence | | | |
|---|---|---|---|
| Measure | Local Authorities Median | Local Authorities Upper Quartile | Private Sector Median |
| Working days lost per FTE | 9.8 | 8.7 (lower q.) | 5.7 |
| Average length of absence (FTE days) | 5.8 | 7.0 | 3.5 |
| % of absences over 20 days | 54.0% | 60.1% | 40.5% |

| Health and Safety | | | |
|---|---|---|---|
| Measure | Local Authorities Median | Local Authorities Lower Quartile | Private Sector Median |
| No. of workplace incidents/injuries reported per 1000 employees | 6.0 | 2.7 | 8.0 |

| Voluntary Turnover | | | |
|---|---|---|---|
| Measure | Local Authorities Median | Local Authorities Lower Quartile | Private Sector Median |
| % staff turnover | 7.2% | 5.9% | 10.5% |
| % staff turnover of leavers within first year's service | n/a | n/a | n/a |

| Disciplinary and Grievance Cases | | | |
|---|---|---|---|
| Measure | Local Authorities Median | Local Authorities Lower Quartile | Private Sector Median |
| No. of disciplinary cases per 1000 employees | 10.2 | 7.2 | 44.8 |
| No. of grievance cases per 1000 employees | 3.7 | 2.2 | 6.4 |

**Wiltshire Council**

**Cabinet**

**19 June 2012**

---

Subject:           **Revenue Outturn 2011/2012**

**Cabinet Member:   Councillor John Brady**
                   **Finance, Performance and Risk**

**Key Decision:     No**

---

| Executive Summary |
|---|
| To advise Cabinet of the final outturn position as at 31 March 2012 for the financial year 2011/2012.  The year end position is an underspend of £0.216 million. This is a £0.032 million variance in the forecast position at period 11. |

| Proposal |
|---|
| That Members note the report showing an outturn underspend of £0.216 million. |

| Reasons for Proposals |
|---|
| That Members can approve the final outturn for 2011/2012. |

| |
|---|
| **Michael Hudson**<br>**Service Director, Finance** |

**Wiltshire Council**

**Cabinet**

**19 June 2012**

---

| **Subject:** | **Revenue Outturn 2011/2012** |
| --- | --- |
| **Cabinet Member:** | **Councillor John Brady** <br> **Finance, Performance and Risk** |
| **Key Decision:** | **No** |

---

## PURPOSE OF REPORT

1. To advise Cabinet of the revenue outturn position for financial year 2011/2012.

## SUMMARY

2. The projected year end position for the relevant account is as follows:

| | **Revised Budget** <br> **£ million** | **Final Outturn Position for Year** <br> **£ million** | **Final Overspend/ (Underspend) for Year** <br> **£ million** | **Overspend/ (Underspend) reported at period 11** <br> **£ million** | **Movement since period 11** <br> **£ million** |
| --- | --- | --- | --- | --- | --- |
| **General Fund Total** | 329.847 | 329.631 | (0.216) | (0.184) | (0.032) |
| **Housing Revenue Account** | (0.411) | (0.541) | (0.130) | (0.020) | (0.110) |

3. The final outturn position on the general fund is an underspend of £0.216 million. This represents an improvement of £0.032 million on the budget monitoring position reported to Members for period 11. This is summarised and tied back to the period 11 monitoring report in Appendix D.

4.   The graph below shows how the forecast outturn position has improved during budget monitoring reports to Cabinet this year. The graph shows a clear continual improvement in the position, following financial management throughout the Council.

## Projected overspend/(underspend) 2011/2012
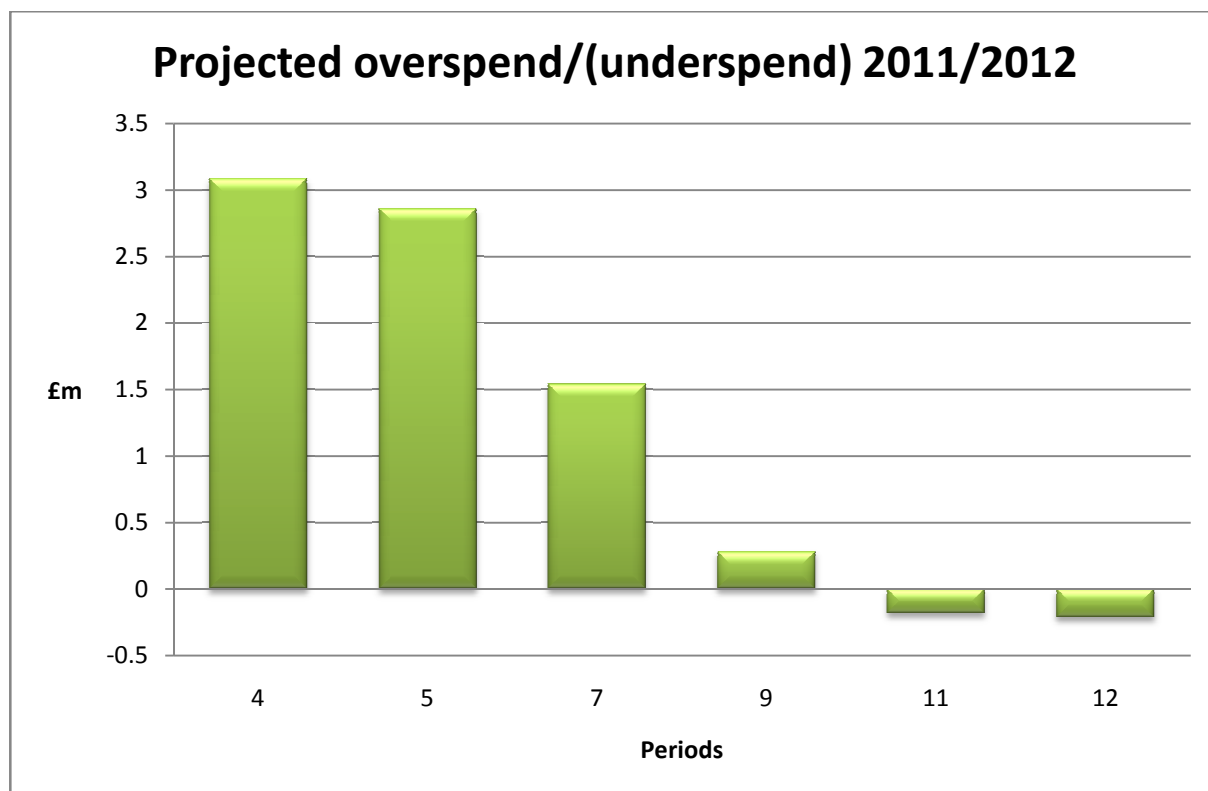


5.   The outturn shows an improved position since the period 11 report. The full details around these service outturns are set out in the detailed monitoring section below and Appendix C.

6.   This outturn shows an improvement on figures in the financial plan. The financial plan will be updated to reflect this during budget setting 2012/2013.


**BUDGET MOVEMENTS SINCE PERIOD 11 REPORTED TO MEMBERS**


7.   There have been some movements between service areas in budget since the last monitoring report at period 11. More details are given in Appendix B.

   **Detailed monitoring**


8.   The overall revised projected net position by service areas is set out in Appendix C.

9.   A summary of the Service Area movements from period 11 monitoring is set out in Appendix D. A more detailed summary of the variances is set out by service areas below.

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**GENERAL FUND**

**Adult Social Care (Operations and Commissioning) (Including Older People, Physical Impairment, Learning Disability, Mental Heath, Supporting People and Resources, Strategy and Commissioning)**

10.   The final outturn position across the combined Adult Social Care Service areas is £0.111 million overspent (£1.155 million overspent for Operations and £1.044 million underspent for commissioning), compared to £0.602 million forecast overspent when last reported. This reflects an improvement against the forecast position for Learning Disabilities, Physical Impairment and Supporting People.

11.   As previously reported, the cost pressures being experienced are largely as a result of demand for Adult Social Care services being greater than that which were assumed when setting the budget. This is predominantly in the areas of:
   - Older People through demand for residential placements and domiciliary care services;
   - Support for Adult Social Care Services provided through the Supporting People budget;
   - Support to people with a Physical Impairment through demand for new high cost, complex care packages;

12.   During 2011/2012, the service received additional one-off resources to help manage in year cost pressures.  These additional resources are reflected in the position reported against commissioning.

13.   During the winter months the service continued to work in partnership with the Primary Care Trust (PCT), monitoring the demand pressures and the impact of this on the PCT and also on social care services.  As a consequence an additional 13 placements were made from hospitals and the cost of these placements in 2012/2013 will be funded from additional "winter pressures" funding received by the PCT.

**Community Leadership & Governance**

14.   The final outturn position for the service of £0.088 million overspend relates to the delivery of budgeted staff savings in the Area Boards service area

**Libraries, Heritage & Arts**

15.   The final outturn position against the Libraries, Heritage and Arts Service of £0.116 million overspend is as a result of lower than budgeted income levels.

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### Housing Services

16. The final outturn position for the service of a £0.298 million underspend is as a result of expenditure in the Housing Options and Allocations service being less than budgeted and a number of vacancies across the department resulting in an underspend against staffing budgets.

### Highways and Street Scene

17. The services final variance for the year moved slightly from the February reported position to members. This gave a final outturn position of £19.051 million net spend, a final variance of £1.208 million which was £0.018 million higher than previously reported, the full details of which have already been previously reported to Cabinet.

### Leisure

18. A marked improvement in actual income received against that previously forecast led to the service reporting a small underspend of £0.035 million. The previous forecast was a prudent estimate factoring in system changes in the collection process being implemented; the actual position was more favourable and overall led to a £0.165 million improvement on the variance previously reported to members.

### Car Parking

19. Continued improvements in actual income received against that forecasted, together with further savings from planned vacant posts within the Civil Enforcement Team led to an overall improved position of a £1.215 million overspend at year end. This is a £0.185 million improvement on that previously reported.

### Children's Services (including Safeguarding, Children's Social Care, Integrated Youth, Early Years, School Improvement, Business & Commercial Services, Targeted Services & Learner Support, Commissioning & Performance and Funding Schools)

20. Children's Services are reporting an underspend of £1.050 million. This represents a favourable movement of £0.632 million compared with the previously reported forecast  As previously reported, underspends within Schools & Learning (including underspends on SEN Transport and Early Years services) have offset overspends within the placement budgets for Looked After Children. Social Care Placement budgets overspent by £1.030 million due to increased numbers of looked after children, this increase has been reported throughout the year.

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21. There were some large swings in expenditure between the reported projection for February and the final position at the end of the year. Reasons for this include:

- Maximisation of grant, in particular the SEN Pathfinder grant within Commissioning & Performance, and additional grant income received late in the year to support the Troubled Families Project for which Wiltshire is a pilot authority. This grant could not be rolled forward;

- Vacant posts – vacant posts within business support were being held in advance of achieving the required savings target in 2012/2013. The full impact of those vacancies was not taken in to account in the period 11 forecast because it was anticipated that there would be additional costs prior to the year end, these costs did not materialise in 2011/2012.

- A reduction in expenditure against the forecast for Early Years, particularly against activity budgets.

22. The summary in Appendix C includes variances against services funded by the Dedicated Schools Grant (DSG) which have not previously been reported to Cabinet, however this does not impact on the overall outturn position as the underspend against DSG is rolled forward in accordance with the conditions of grant. The total underspend against DSG budgets is £1.606 million and the movement to reserves is shown within the outturn figures for Commissioning & Performance. Variances against DSG have been monitored and reported to Schools Forum throughout the financial year and a proportion of the underspend has been committed to support the schools budget in 2012/2013 as described in the financial plan report to Council in February 2012.

## Policy, Performance & Partnerships

23. This service underspent by £0.114 million, largely due to staffing vacancies throughout the year.

## Finance, Procurement & Internal Audit

24. The service forecast overspend increased by £0.305 million to a £0.505 million overspend at year end. The movement in the outturn was mostly attributable to forecast income receivable for court costs. The forecast was not realised due to a delay in issuing summons in the last months of 2011/2012 in order for implementation of the new revenues and benefits system to bed in.

### Legal & Democratic

25.	The service final outturn variance moved by a favourable £0.011 million to the position previously reported to members. Overall the service reported a £0.439 million overspend.

### Communications & Branding

26.	The service reports a final overspend of £0.194 million.  The overspend is mostly as a result of an unachievable income target around advertising and marketing, which has been offset during the year by other favourable variances in expenditure e.g. vacant posts.

### Human Resources & Organisational Development

27.	The service final outturn variance moved by a favourable £0.022 million to the position previously reported to members. Overall the service reported a £0.222 million underspend.

### Information Services

28.	The service final outturn variance increased by £0.051 million to the position previously reported to members, however within that the service was able to maximise revenue contributions to capital to assist the Councils overall transformation programme. The service reported a £0.949 million underspend details of which have already been detailed in previous Cabinet reports.

### Business Services

29.	The service was able to manage its budget on line, only reporting a small overspend of £0.001 million at year end.

### Strategic Property Services

30.	The service final outturn variance moved by £0.252 million which saw the reported underspend reduced to £0.048 million. This was mainly attributable to the permissible amount that can be charged to the capital programme for work on capital projects being less than budgeted and a small net loss on commercial properties against budget.

**Transformation Programme**

31.  The service final outturn differed slightly, a small reduction of £0.007 million, from that previously reported to members last time, resulting in an overspend of £0.533 million at year end the details of which have previously been detailed.

**Economy & Enterprise**

32.  The service final outturn variance moved by an adverse £0.007 million to the position previously reported to members. Overall the service reported a £0.393 million underspend.

**Development Services**

33.  The service saw a £0.202 million improvement to the previously reported variance so that the final underspend stood at £0.382 million.  Sizeable planning applications and a continued marked improvement in income received led to this improved position.  The service was also able to prudently provide for potential future legal costs arising from planning decisions.  The position on income also signals potential good news for 2012/2013 should the trend continue.

**Highways Strategic Services**

34.  The service saw a £0.157 million improvement on the previous forecast position to return a final outturn underspend of £0.657 million. As previously reported the continued improvement in the level of supervision fees received from developers was the main driver behind the reported underspend, as well as the finalisation of the agreed discount with the Highways Works contractor.

**Passenger Transport (including Education Transport and Public Transport)**

35.  The combined service saw a significant improvement of £0.532 million on the previous forecast position to return a final outturn underspend of £1.122 million. The majority of this underspend was attributable to previously reported savings achieved in various areas of spending since the budget was set. In addition smaller movements in the expected cost of the RTPI (Real Time Passenger Information) system and the link payment and voucher system (national travel token scheme) also contributed to the underspend.

**Waste**

36. The service is reporting a £0.055 million overspend against a £26.090 million revised budget, which is a £0.295 million improvement on the previously reported position. The position has improved due to improvements on cautious forecast on landfill tax and income which were not finalised and known until year end and a reduction in forecast costs in relation to the roll out of the new Waste services.

**Public Health and Public Protection**

37. The final outturn variance moved by a favourable £0.042 million to the position previously reported to members. Overall the service reported a £0.122 million underspend which is mostly attributable to saving on employee costs through staff and vacancy management.

**Digital Inclusion**

38. An underspend of £0.081 million was achieved against the revenue budget for Digital Inclusion. Because of the success in accessing grant funding for the first wave of capital investment in this project, the requirement for revenue funding in the first year of the project has been lower than initially assumed within the Council's business plan. This underspend has therefore been transferred to the Digital Inclusion Reserve in order to support funding for the project in future years, when revenue contributions from the Council will be required, and therefore no variance is shown for 2011/2012.

**Corporate Directors**

39. An increased in the forecast underspend led to an overall underspend of £0.082 million against the Corporate Directors line. This line is the amalgamation of the previous four Corporate Directors budgets, the Chief Executive budget line and the ex-DNP Business Services team. The underspend is mostly attributable to salary savings.

**Corporate**

40. Movement to/from Reserves is showing a difference of £2.313 million. This is primarily due to the fact that the Council did not require the £2.367 million draw from general fund reserves as originally budgeted due to the overall improved financial position.

41. Capital Financing is underspent by £2.995 million. This is due to the reprogramming of capital schemes from 2011/2012 into later years. This has meant that the Council has not had to borrow as much as originally anticipated in order to cover the capital expenditure. The Council has also not had to make a minimum revenue provision to pay back the principal of the debt. Therefore the costs incurred in servicing the Council's borrowing (principal and interest costs) have been lower than originally planned. This is an improvement of £1.500 million on month 11 report.

42. Restructure and Contingency is reporting a net difference from the original budget of £2.488 million. This comprised of additional Corporate pressures of £3.751million. This is predominantly due to the need to create several large corporate provisions for which the Council has a present (now emerging legal) obligation resulting from previous legal claims. The corporate pressures are partly offset by an underspend of £1.263 million on Restructuring which relates to incurring less severance costs due to good vacancy management. After utilising in full the provision created in 2010/2011 for 2011/2012 severance costs, the total cost to the general fund was £2.736 million against an original budget of £4.000 million.

43. Specific & General Grants is underspent by £0.791 million. This is mainly due to the Council receiving £0.722 million of extra government grant in March 2012 for Sure Start Early Years. This is extra grant relating to capital expenditure incurred on Sure Start during and prior to 2010/2011, which had been previously fully funded from borrowing. This grant is applied to general grants to repay the borrowing incurred upfront in 2010/2011.

**HOUSING REVENUE ACCOUNT**

44. The Housing Revenue Account outturn is an underspend of £0.130 million. This is a small improvement on the month 11 forecast underspend of £0.020 million.

**Reserves**

45.  The tables below shows the year end outturn position on the general fund balance and estimated earmarked reserves held by the council.

46.  Due to the overall improved financial position it is not necessary to take an additional draw from reserves during this financial year. This leaves a balance as at 31 March 2012 on General Fund reserves of £14.145 million after extra transfer in the year of £0.216 million.

| General Fund Reserve | £ million | £ million |
|---|---|---|
| Balance as at 1 April 2011 | | (13.926) |
| | | |
| Full Year underspend | (0.216) | |
| Extra Funding roundings | (0.003) | |
| Total Forecast movement | | (0.219) |
| **Balance 31 March 2012** | | **(14.145)** |

47.  The Council also has some ring fenced earmarked reserves. A summary of which is included below:

| Earmarked Reserves | Opening Balance 01-Apr-11 £ million | Drawdowns/ Deposits £ million | Closing Balance 31-Mar-12 £ million |
|---|---|---|---|
| PFI Reserve | (3.151) | | (3.151) |
| Insurance Reserve | (4.450) | | (4.450) |
| Schools Balances | (16.049) | 2.896 | (13.153) |
| WTP Reserve | (0.228) | | (0.228) |
| Libraries Operating Reserve | (0.051) | | (0.051) |
| Housing Reserve | (0.042) | | (0.042) |
| CRB System Reserve | (0.049) | 0.041 | (0.008) |
| Elections Reserve | (0.200) | (0.200) | (0.400) |
| Street Lighting Reserve | (0.100) | | (0.100) |
| Area Board Reserve | (1.200) | 0.617 | (0.583) |
| Occupational Health System Reserve | | (0.020) | (0.020) |
| Energy Efficiency Reserve | | (0.180) | (0.180) |
| Digital Inclusion Reserve | | (0.153) | (0.153) |
| Improving Safeguarding Reserve | | (0.500) | (0.500) |
| Revenue Grants Reserve | (9.039) | 4.509 | (4.530) |
| **Total Earmarked Reserves** | **(34.559)** | **7.010** | **(27.549)** |

**Main Consideration for the Council**

48.   To note the current budget monitoring report.

**Environmental Implications**

49.   None have been identified as arising directly from this report.

**Equality & Diversity Implications**

50.   No equality and diversity issues have been identified or arising from this report.

**Legal Implications**

51.   None have been identified as arising directly from this report.

**Risk Assessment**

52.   During the year, the Council has faced significant service financial pressures, including Central Government grant reductions, have been identified across departments during the financial year.  Actions to manage these pressures have been agreed previously and work undertaken to manage the financial position.

53.   The Council has identified in its corporate risk register various elements which have been covered in previous monitoring reports, most notably the impact the current economic climate has on the Council's finances.

**Financial Implications**

54.   These have been examined and are implicit throughout the report.

**Proposals**

55.   That Members can approve the final outturn for 2011/2012.

   **Background Papers and Consultation**

   2011-15 Business Plan
   2011-15 Financial Plan
   Budget Monitoring Cabinet Period 3 26 July 2011
   Budget Monitoring Cabinet Period 4 13 September 2011
   Budget Monitoring Cabinet Period 5 18 October 2011
   Budget Monitoring Cabinet Period 7 13 December 2011
   Budget Monitoring Cabinet Period 9 15 February 2012
   Budget Monitoring Cabinet Period 11 17 April 2012

**Contact Name:**
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   michael.hudson@Wiltshire.gov.uk

   Report author: Matthew Tiller, Chief Accountant

**Appendices:**

Appendix A: Revenue Budget Movements 2011/2012
Appendix B: Service Area Movements 2011/2012
Appendix C: Detailed Service Area Budget Statements
Appendix D: Variance Movement

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# Wiltshire Council Revenue Budget Movements 2011/2012

| Service | Original Budget | Restructure Virements | Original Budget (restructured) | In Year Virements to Period 5 | Revised Budget Period 5 | In year Virements Periods 6 &7 | Revised Budget Period 7 | In year Virements Periods 8 & 9 | Revised Budget Period 9 | In year Virements Periods 10 & 11 | Revised Budget Period 11 | In year Virements Period 12 | Revised Budget Period 12 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | £m | £m | £m | £m | £m | | | | | | | | |
| **Adult Care Operations** | | | | | | | | | | | | | |
| Older People | 40.070 | (0.098) | 39.972 | 4.091 | 44.063 | (0.009) | 44.054 | 0.014 | 44.068 | | 44.068 | | 44.068 |
| Physical Impairment | 7.976 | 0.000 | 7.976 | (0.174) | 7.802 | 0.000 | 7.802 | | 7.802 | | 7.802 | (0.019) | 7.783 |
| Learning Disability | 39.589 | 0.000 | 39.589 | (2.681) | 36.908 | (0.177) | 36.731 | | 36.731 | | 36.731 | | 36.731 |
| Mental Health | 21.770 | 0.278 | 22.048 | (1.110) | 20.938 | 0.021 | 20.959 | | 20.959 | | 20.959 | | 20.959 |
| Supporting People | 7.190 | 0.000 | 7.190 | (0.063) | 7.127 | 0.000 | 7.127 | | 7.127 | | 7.127 | | 7.127 |
| **Adult Care Commissioning** | | | | | | | | | | | | | |
| Resources, Strategy & Commissioning | 3.073 | 0.309 | 3.382 | (0.301) | 3.081 | 1.967 | 5.048 | (0.174) | 4.874 | (0.041) | 4.833 | 0.000 | 4.833 |
| Extra Non ring fenced grant | 0.000 | 0.000 | 0.000 | 2.000 | 2.000 | (2.000) | 0.000 | | 0.000 | | 0.000 | | 0.000 |
| **Communities, Libraries , Heritage & Arts** | | | | | | | | | | | | | |
| Community Leadership & Governance | 2.932 | 0.000 | 2.932 | 0.207 | 3.139 | (0.062) | 3.077 | 0.026 | 3.103 | | 3.103 | 0.685 | 3.788 |
| Libraries Heritage & Arts | 4.832 | 0.000 | 4.832 | (0.060) | 4.772 | (0.036) | 4.736 | | 4.736 | | 4.736 | | 4.736 |
| **Housing Services** | | | | | | | | | | | | | |
| Housing Services | 2.949 | (0.021) | 2.928 | (0.147) | 2.781 | (0.005) | 2.776 | | 2.776 | | 2.776 | (0.149) | 2.627 |
| **Neighbourhood Services** | | | | | | | | | | | | | |
| Highways and Street Scenes | 14.775 | 0.185 | 14.960 | 2.930 | 17.890 | (0.047) | 17.843 | | 17.843 | | 17.843 | | 17.843 |
| Leisure | 3.389 | 0.000 | 3.389 | (0.585) | 2.804 | (0.049) | 2.755 | | 2.755 | | 2.755 | | 2.755 |
| Car Parking | (7.330) | 0.000 | (7.330) | 0.258 | (7.072) | (0.028) | (7.100) | | (7.100) | | (7.100) | | (7.100) |
| **Children & Families** | | | | | | | | | | | | | |
| Safeguarding | 0.796 | 0.000 | 0.796 | 0.044 | 0.840 | (0.001) | 0.839 | | 0.839 | | 0.839 | 0.127 | 0.966 |
| Connexions Service | 1.887 | (1.887) | | | 0.000 | 0.000 | 0.000 | | 0.000 | | 0.000 | | 0.000 |
| Youth Development Service | 2.081 | (2.081) | | | 0.000 | 0.000 | 0.000 | | 0.000 | | 0.000 | | 0.000 |
| Youth Offending Service | 1.616 | (1.616) | | | 0.000 | 0.000 | 0.000 | | 0.000 | | 0.000 | | 0.000 |
| Young People's Support Service | 0.173 | (0.173) | | | 0.000 | 0.000 | 0.000 | | 0.000 | | 0.000 | | 0.000 |
| Other Targeted Services | 1.834 | (1.834) | | | 0.000 | 0.000 | 0.000 | | 0.000 | | 0.000 | | 0.000 |
| Children's Social Care | 28.586 | (0.224) | 28.362 | (0.370) | 27.992 | (0.156) | 27.836 | 0.208 | 28.044 | | 28.044 | (0.209) | 27.835 |
| Integrated Youth | 0.000 | 5.615 | 5.615 | 0.036 | 5.651 | (0.067) | 5.584 | (0.232) | 5.352 | | 5.352 | (0.168) | 5.184 |
| **Schools & Learning** | | | | | | | | | | | | | |
| Early Years | 9.784 | (0.390) | 9.394 | 0.087 | 9.481 | 0.000 | 9.481 | (0.481) | 9.000 | | 9.000 | (0.032) | 8.968 |
| School Buildings & Places | 0.251 | (0.251) | | | 0.000 | 0.000 | 0.000 | | 0.000 | | 0.000 | | 0.000 |
| School Improvement | 4.544 | (0.314) | 4.230 | 2.089 | 6.319 | (0.019) | 6.300 | 0.037 | 6.337 | | 6.337 | (0.236) | 6.101 |
| Traded Services | (0.377) | 0.377 | | | 0.000 | 0.000 | 0.000 | | 0.000 | | 0.000 | | 0.000 |
| Special Educational Needs | 5.938 | (5.938) | | | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | | 0.000 | | 0.000 |
| Business & Commercial Services | 0.000 | (0.303) | (0.303) | 1.044 | 0.741 | (0.025) | 0.716 | 0.428 | 1.144 | | 1.144 | (0.161) | 0.983 |
| Targeted Services & Learner Support | 0.000 | 8.004 | 8.004 | 1.405 | 9.409 | (0.088) | 9.321 | 0.020 | 9.341 | 0.005 | 9.346 | (0.093) | 9.253 |
| **Children's Services Commissioning & Performance** | | | | | | | | | | | | | |
| Commissioning and Performance | 2.135 | 1.015 | 3.150 | (0.256) | 2.894 | 0.161 | 3.055 | (0.257) | 2.798 | (0.078) | 2.720 | (2.054) | 0.666 |
| Funding Schools | 0.000 | 0.000 | 0.000 | 1.968 | 1.968 | 0.000 | 1.968 | | 1.968 | | 1.968 | 1.308 | 3.276 |
| **Policy, Performance & Partnership** | | | | | | | | | | | | | |
| Policy, Performance & Partnership | 0.343 | 0.141 | 0.484 | (0.001) | 0.483 | 0.084 | 0.567 | | 0.567 | | 0.567 | | 0.567 |
| **Finance** | | | | | | | | | | | | | |
| Finance, Procurement & Internal Audit | 17.467 | (7.595) | 9.872 | (0.247) | 9.625 | (0.106) | 9.519 | (0.531) | 8.988 | 0.035 | 9.023 | 0.047 | 9.070 |
| Revenues & Benefits - Subsidy | 0.107 | 0.000 | 0.107 | 0.000 | 0.107 | 0.000 | 0.107 | | 0.107 | | 0.107 | | 0.107 |
| **Legal & Democratic** | | | | | | | | | | | | | |
| Legal & Democratic | 4.228 | 0.001 | 4.229 | 1.855 | 6.084 | 0.161 | 6.245 | | 6.245 | 0.213 | 6.458 | (0.200) | 6.258 |
| **Communications** | | | | | | | | | | | | | |
| Comms & Branding | 2.215 | (0.429) | 1.786 | 0.172 | 1.958 | (0.010) | 1.948 | | 1.948 | | 1.948 | | 1.948 |
| **HR & Organisational Development** | | | | | | | | | | | | | |
| Human Resources & Organisational Development | 3.247 | 0.000 | 3.247 | (0.011) | 3.236 | (0.002) | 3.234 | 0.001 | 3.235 | | 3.235 | | 3.235 |
| **Business Services** | | | | | | | | | | | | | |
| Information Services | 17.746 | (0.051) | 17.695 | (0.236) | 17.459 | (1.148) | 16.311 | 0.040 | 16.351 | 0.122 | 16.473 | | 16.473 |
| Shared Services and Customer Care/ Business Services | 4.836 | 0.858 | 5.694 | (0.011) | 5.683 | (0.012) | 5.671 | | 5.671 | (0.095) | 5.576 | 0.025 | 5.601 |
| Strategic Property Services | 12.880 | (10.310) | 2.570 | (0.031) | 2.539 | 0.042 | 2.581 | | 2.581 | | 2.581 | 0.264 | 2.845 |
| **Transformation Programme** | | | | | | | | | | | | | |
| Transformation Programme | 0.193 | 10.599 | 10.792 | 0.842 | 11.634 | 2.341 | 13.975 | 0.635 | 14.610 | (0.015) | 14.595 | (0.252) | 14.343 |
| **Economy and Enterprise** | | | | | | | | | | | | | |
| Economy & Enterprise | 4.129 | 0.001 | 4.130 | (0.009) | 4.121 | 0.433 | 4.554 | | 4.554 | (0.047) | 4.507 | 0.155 | 4.662 |
| **Development Services** | | | | | | | | | | | | | |
| Development Services | 2.038 | 0.000 | 2.038 | (0.253) | 1.785 | (0.013) | 1.772 | | 1.772 | | 1.772 | | 1.772 |
| **Strategic Services, Highways and Transport** | | | | | | | | | | | | | |
| Highways Strategic Services | 8.196 | (0.342) | 7.854 | 0.111 | 7.965 | (0.019) | 7.946 | | 7.946 | | 7.946 | | 7.946 |
| Public Transport | 12.590 | 0.059 | 12.649 | (0.107) | 12.542 | (0.009) | 12.533 | | 12.533 | | 12.533 | (0.273) | 12.260 |
| Education Transport | 8.560 | 0.098 | 8.658 | (0.133) | 8.525 | (0.001) | 8.524 | | 8.524 | | 8.524 | (0.013) | 8.511 |
| **Waste** | | | | | | | | | | | | | |
| Waste | 29.060 | 0.000 | 29.060 | (2.457) | 26.603 | (0.011) | 26.592 | (0.121) | 26.471 | | 26.471 | (0.381) | 26.090 |
| **Public Health & Protection** | | | | | | | | | | | | | |
| Public Health & Protection | 4.519 | 0.000 | 4.519 | (0.084) | 4.435 | (0.013) | 4.422 | (0.020) | 4.402 | | 4.402 | | 4.402 |
| **Digital Inclusion** | | | | | | | | | | | | | |
| Digital Inclusion | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.252 | 0.252 | | 0.252 | | 0.252 | (0.083) | 0.169 |
| **Corporate Directors** | | | | | | | | | | | | | |
| Corporate Directors | 1.852 | 0.000 | 1.852 | (0.453) | 1.399 | (0.004) | 1.395 | 0.407 | 1.802 | (0.079) | 1.723 | (0.008) | 1.715 |
| **Corporate** | | | | | | | | | | | | | |
| Movement To/ From Reserves | (1.867) | 0.000 | (1.867) | (7.292) | (9.159) | (0.500) | (9.659) | | (9.659) | | (9.659) | 1.925 | (7.734) |
| Capital Financing | 22.321 | 0.000 | 22.321 | 0.000 | 22.321 | 0.216 | 22.537 | | 22.537 | | 22.537 | 0.378 | 22.915 |
| Restructure and Contingency | 7.023 | 0.000 | 7.023 | (0.600) | 6.423 | (1.061) | 5.362 | | 5.362 | | 5.362 | (1.264) | 4.098 |
| Specific and General Grants | (32.299) | 0.000 | (32.299) | (2.067) | (34.366) | 0.000 | (34.366) | | (34.366) | (0.020) | (34.386) | (0.020) | (34.406) |
| Corporate Levys | 0.000 | 6.317 | 6.317 | 0.600 | 6.917 | 0.000 | 6.917 | | 6.917 | | 6.917 | 0.701 | 7.618 |
| **2011-2012 Budget Requirement** | **329.847** | **0.000** | **329.847** | **0.000** | **329.847** | **(0.000)** | **329.847** | **0.000** | **329.847** | **0.000** | **329.847** | **0.000** | **329.847** |
| | | | | | | | | | | | | | |
| HRA Budget | (0.411) | 0.000 | (0.411) | 0.000 | (0.411) | 0.000 | (0.411) | | (0.411) | | (0.411) | | (0.411) |
| | **329.436** | **0.000** | **329.436** | **0.000** | **329.436** | **(0.000)** | **329.436** | **0.000** | **329.436** | **0.000** | **329.436** | **0.000** | **329.436** |

## Major Wiltshire Council Virements between Services Areas from Period 11 to Period 12

| | £m |
|---|---|
| **Adult Care Operations** | |
| **Revised Budget Period 11** | **116.687** |
| *In Year Virements period 12* | |
| *Movement to/from Revenue Grants EMR* | (0.019) |
| **Revised Budget Period 12** | **116.668** |
| | |
| **Adult Care Commissioning** | |
| **Revised Budget Period 11** | **4.833** |
| *In Year Virements period 12* | |
| *Transfer of Performance post from Housing Services* | 0.006 |
| *Movement to/from Revenue Grants EMR* | (0.006) |
| **Revised Budget Period 12** | **4.833** |
| | |
| **Communities, Libraries, Heritage & Arts** | |
| **Revised Budget Period 11** | **7.839** |
| *In Year Virements period 12* | |
| *Release of Investment re: Spice Project* | 0.100 |
| *Release of Investment re: Big Society* | 0.060 |
| *Movement to/from Revenue Grants EMR* | (0.091) |
| *Movement to/from Area Boards EMR* | 0.616 |
| **Revised Budget Period 12** | **8.524** |
| | |
| **Housing Services** | |
| **Revised Budget Period 11** | **2.776** |
| *In Year Virements period 12* | |
| *Transfer of Performance post to Communities & Libraries* | (0.006) |
| *Movement to/from Revenue Grants EMR* | (0.143) |
| **Revised Budget Period 12** | **2.627** |
| | |
| **Neighbourhood Services** | |
| **Revised Budget Period 11** | **13.498** |
| *No in Year Virements period 12* | |
| **Revised Budget Period 12** | **13.498** |
| | |
| **Children & Families** | |
| **Revised Budget Period 11** | **34.235** |
| *In Year Virements period 12* | |
| *Movement of Children's Rights Office from Commissioning & Performance* | 0.127 |
| *DSG funding adjustment* | 0.008 |
| *Centralisation of pension backfunding* | (0.081) |
| *Movement to/from Revenue Grants EMR* | (0.304) |
| **Revised Budget Period 12** | **33.985** |
| | |
| **Schools & Learning** | |
| **Revised Budget Period 11** | **25.827** |
| *In Year Virements period 12* | |
| *DSG funding adjustment* | 0.067 |
| *Centralisation of pension backfunding* | (0.351) |
| *Movement to/from Revenue Grants EMR* | (0.238) |
| **Revised Budget Period 12** | **25.305** |
| | |
| **Children's Services Commissioning & Performance** | |
| **Revised Budget Period 11** | **4.688** |
| *In Year Virements period 12* | |
| *Movement of Children's Rights Office to Children & Families* | (0.127) |
| *Release of extra early intevention grant for complex schools* | 0.020 |
| *DSG funding adjustment* | (0.075) |
| *Centralisation of pension backfunding* | (0.224) |
| *Movement to/from Schools EMR* | 1.355 |
| *Movement to/from Revenue Grants EMR* | (1.695) |
| **Revised Budget Period 12** | **3.942** |
| | |
| **Policy, Performance & Partnership** | |
| **Revised Budget Period 11** | **0.567** |
| *No in Year Virements period 12* | |
| **Revised Budget Period 12** | **0.567** |
| | |
| **Finance** | |
| **Revised Budget Period 11** | **9.130** |
| *In Year Virements period 12* | |
| *Release of Investment re: Housing PFI* | 0.084 |
| *Centralisation of pension backfunding* | (0.037) |
| **Revised Budget Period 12** | **9.177** |
| | |
| **Legal & Democratic** | |
| **Revised Budget Period 11** | **6.458** |
| *In Year Virements period 12* | |
| *Movement to/from Revenue Grants EMR* | (0.200) |
| **Revised Budget Period 12** | **6.258** |
| | |
| **Communications** | |
| **Revised Budget Period 11** | **1.948** |
| *No in Year Virements period 12* | |
| **Revised Budget Period 12** | **1.948** |

| | £m |
|---|---|
| **HR & Organisational Development** | |
| **Revised Budget Period 11** | **3.235** |
| *No in Year Virements period 12* | |
| **Revised Budget Period 12** | **3.235** |
| | |
| **Business Services** | |
| **Revised Budget Period 11** | **24.630** |
| *In Year Virements period 12* | |
| *Waste Management Changes* | 0.003 |
| *Movement of budgets to transformation* | 0.265 |
| *Movement to/from Revenue Grants EMR* | 0.041 |
| *Creation of Occupational Health System EMR* | (0.020) |
| **Revised Budget Period 12** | **24.919** |
| | |
| **Transformation Programme** | |
| **Revised Budget Period 11** | **14.595** |
| *In Year Virements period 12* | |
| *Movement of Castledown Business Park to Economy & Enterprise* | 0.013 |
| *Movement of budgets from business support* | (0.265) |
| **Revised Budget Period 12** | **14.343** |
| | |
| **Economy and Enterprise** | |
| **Revised Budget Period 11** | **4.507** |
| *In Year Virements period 12* | |
| *Movement of Castledown Business Park from Transformation* | (0.013) |
| *Release of Investment re: Economy* | 0.090 |
| *Release of Investment re: Energy Efficiency* | 0.178 |
| *Movement to/from Revenue Grants EMR* | (0.100) |
| **Revised Budget Period 12** | **4.662** |
| | |
| **Development Services** | |
| **Revised Budget Period 11** | **1.772** |
| *No in Year Virements period 12* | |
| **Revised Budget Period 12** | **1.772** |
| | |
| **Strategic Services, Highways and Transport** | |
| **Revised Budget Period 11** | **29.003** |
| *In Year Virements period 12* | |
| *Movement to/from Revenue Grants EMR* | (0.286) |
| **Revised Budget Period 12** | **28.717** |
| | |
| **Waste** | |
| **Revised Budget Period 11** | **26.471** |
| *In Year Virements period 12* | |
| *Waste Management Changes* | (0.381) |
| **Revised Budget Period 12** | **26.090** |
| | |
| **Public Health & Protection** | |
| **Revised Budget Period 11** | **4.402** |
| *No in Year Virements period 12* | |
| **Revised Budget Period 12** | **4.402** |
| | |
| **Digital Inclusion** | |
| **Revised Budget Period 11** | **0.252** |
| *In Year Virements period 12* | |
| *Creation of Digital Inclusion EMR* | (0.083) |
| **Revised Budget Period 12** | **0.169** |
| | |
| **Corporate Directors** | |
| **Revised Budget Period 11** | **1.723** |
| *In Year Virements period 12* | |
| *Centralisation of pension backfunding* | (0.008) |
| **Revised Budget Period 12** | **1.715** |
| | |
| **Corporate** | |
| **Revised Budget Period 11** | **(9.229)** |
| *In Year Virements period 12* | |
| *Release of Investment re: Spice Project* | (0.100) |
| *Release of Investment re: Economy* | (0.090) |
| *Release of Investment re: Housing PFI* | (0.084) |
| *Release of Investment re: Energy Efficiency* | (0.178) |
| *Release of Investment re: Big Society* | (0.060) |
| *Release of extra early intevention grant for complex schools* | (0.020) |
| *Waste Management Changes* | 0.378 |
| *Centralisation of pension backfunding* | 0.701 |
| *Movement to/from Revenue Grants EMR* | 3.041 |
| *Movement to/from Area Boards EMR* | (0.616) |
| *Movement to/from Schools EMR* | (1.355) |
| *Creation of Occupational Health System EMR* | 0.020 |
| *Creation of Digital Inclusion EMR* | 0.083 |
| **Revised Budget Period 12** | **(7.509)** |

| **SUMMARY TOTALS** | |
|---|---|
| **Revised Budget Period 11** | 329.847 |
| **Revised Budget Period 12** | 329.847 |
| | |
| HRA Budget (Unchanged) | (0.411) |

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# Wiltshire Council Revenue Outturn Statement 2011/2012

31-Mar-12

| | | *Original Budget* | *Revised Budget* | *Actual Position 31-Mar-12* | *Variation for Year: Overspend / (Underspend)* | *Variation as % of Revised Budget: Overspend / (Underspend)* |
|---|---|---|---|---|---|---|
| | | *£m* | *£m* | *£m* | *£m* | |
| **Adult Care Operations** | | | | | | |
| Older People | Gross Costs | 47.849 | 53.117 | 55.509 | 2.392 | 4.5% |
| | Income | (7.877) | (9.049) | (11.135) | (2.086) | 23.1% |
| | Net | **39.972** | **44.068** | **44.374** | **0.306** | **0.7%** |
| | | | | | | |
| Physical Impairment | Gross Costs | 9.046 | 8.433 | 8.912 | 0.479 | 5.7% |
| | Income | (1.070) | (0.650) | (0.737) | (0.087) | 13.4% |
| | Net | **7.976** | **7.783** | **8.175** | **0.392** | **5.0%** |
| | | | | | | |
| Learning Disability | Gross Costs | 43.463 | 40.232 | 40.409 | 0.177 | 0.4% |
| | Income | (3.874) | (3.501) | (3.848) | (0.347) | 9.9% |
| | Net | **39.589** | **36.731** | **36.561** | **(0.170)** | **(0.5%)** |
| | | | | | | |
| Mental Health | Gross Costs | 26.034 | 25.028 | 25.214 | 0.186 | 0.7% |
| | Income | (3.986) | (4.069) | (4.199) | (0.130) | 3.2% |
| | Net | **22.048** | **20.959** | **21.015** | **0.056** | **0.3%** |
| | | | | | | |
| Supporting People | Gross Costs | 7.190 | 7.127 | 7.723 | 0.596 | 8.4% |
| | Income | - | - | (0.025) | (0.025) | |
| | Net | **7.190** | **7.127** | **7.698** | **0.571** | **8.0%** |
| | | | | | | |
| **Adult Care Commissioning** | | | | | | |
| Resources, Strategy & Commissioning | Gross Costs | 3.511 | 4.986 | 3.920 | (1.066) | (21.4%) |
| | Income | (0.129) | (0.153) | (0.131) | 0.022 | (14.4%) |
| | Net | **3.382** | **4.833** | **3.789** | **(1.044)** | **(21.6%)** |
| | | | | | | |
| **Communities, Libraries, Heritage & Arts** | | | | | | |
| Community Leadership & Governance | Gross Costs | 3.987 | 3.837 | 4.141 | 0.304 | 7.9% |
| | Income | (1.055) | (0.049) | (0.265) | (0.216) | 440.8% |
| | Net | **2.932** | **3.788** | **3.876** | **0.088** | **2.3%** |
| | | | | | | |
| Libraries, Heritage & Arts | Gross Costs | 5.893 | 5.761 | 5.737 | (0.024) | (0.4%) |
| | Income | (1.061) | (1.025) | (0.885) | 0.140 | (13.7%) |
| | Net | **4.832** | **4.736** | **4.852** | **0.116** | **2.4%** |
| | | | | | | |
| **Housing Services** | | | | | | |
| Housing Services | Gross Costs | 3.770 | 3.931 | 3.355 | (0.576) | (14.7%) |
| | Income | (0.842) | (1.304) | (1.026) | 0.278 | (21.3%) |
| | Net | **2.928** | **2.627** | **2.329** | **(0.298)** | **(11.3%)** |
| | | | | | | |
| **Neighbourhood Services** | | | | | | |
| Highways & Street Scene | Gross Costs | 18.219 | 24.514 | 25.278 | 0.764 | 3.1% |
| | Income | (3.259) | (6.671) | (6.227) | 0.444 | (6.7%) |
| | Net | **14.960** | **17.843** | **19.051** | **1.208** | **6.8%** |
| | | | | | | |
| Leisure | Gross Costs | 8.549 | 7.668 | 7.758 | 0.090 | 1.2% |
| | Income | (5.160) | (4.913) | (5.038) | (0.125) | 2.5% |
| | Net | **3.389** | **2.755** | **2.720** | **(0.035)** | **(1.3%)** |
| | | | | | | |
| Car Parking | Gross Costs | 1.961 | 1.827 | 1.651 | (0.176) | (9.6%) |
| | Income | (9.291) | (8.927) | (7.536) | 1.391 | (15.6%) |
| | Net | **(7.330)** | **(7.100)** | **(5.885)** | **1.215** | **(17.1%)** |
| | | | | | | |
| **Children & Families** | | | | | | |
| Safeguarding | Gross Costs | 0.884 | 1.054 | 1.109 | 0.055 | 5.2% |
| | Income | (0.088) | (0.088) | (0.055) | 0.033 | (37.5%) |
| | Net | **0.796** | **0.966** | **1.054** | **0.088** | **9.1%** |
| | | | | | | |
| Children's Social Care | Gross Costs | 29.202 | 29.010 | 29.872 | 0.862 | 3.0% |
| | Income | (0.840) | (1.175) | (1.455) | (0.280) | 23.8% |
| | Net | **28.362** | **27.835** | **28.417** | **0.582** | **2.1%** |
| | | | | | | |
| Integrated Youth | Gross Costs | 7.009 | 6.675 | 6.145 | (0.530) | (7.9%) |
| | Income | (1.394) | (1.491) | (1.101) | 0.390 | (26.2%) |
| | Net | **5.615** | **5.184** | **5.044** | **(0.140)** | **(2.7%)** |

# Wiltshire Council Revenue Outturn Statement 2011/2012

**31-Mar-12**

| | | *Original Budget* | *Revised Budget* | *Actual Position 31-Mar-12* | *Variation for Year: Overspend / (Underspend)* | *Variation as % of Revised Budget: Overspend / (Underspend)* |
|---|---|---|---|---|---|---|
| | | *£m* | *£m* | *£m* | *£m* | |
| **Schools & Learning** | | | | | | |
| Early Years | Gross Costs | 25.161 | 24.711 | 24.169 | (0.542) | (2.2%) |
| | Income | (15.767) | (15.743) | (15.918) | (0.175) | 1.1% |
| | Net | **9.394** | **8.968** | **8.251** | **(0.717)** | **(8.0%)** |
| | | | | | | |
| School Improvement | Gross Costs | 5.319 | 9.311 | 8.757 | (0.554) | (5.9%) |
| | Income | (1.089) | (3.210) | (3.055) | 0.155 | (4.8%) |
| | Net | **4.230** | **6.101** | **5.702** | **(0.399)** | **(6.5%)** |
| | | | | | | |
| Business & Commercial Services | Gross Costs | 3.444 | 4.646 | 4.611 | (0.035) | (0.8%) |
| | Income | (3.747) | (3.663) | (3.658) | 0.005 | (0.1%) |
| | Net | **(0.303)** | **0.983** | **0.953** | **(0.030)** | **(3.1%)** |
| | | | | | | |
| Targeted Services & Learner Support | Gross Costs | 24.237 | 25.754 | 24.038 | (1.716) | (6.7%) |
| | Income | (16.233) | (16.501) | (16.653) | (0.152) | 0.9% |
| | Net | **8.004** | **9.253** | **7.385** | **(1.868)** | **(20.2%)** |
| | | | | | | |
| **Children's Services Commissioning & Performance** | | | | | | |
| Commissioning & Performance | Gross Costs | 9.014 | 8.399 | 8.237 | (0.162) | (1.9%) |
| | Income | (5.864) | (7.733) | (5.986) | 1.747 | (22.6%) |
| | Net | **3.150** | **0.666** | **2.251** | **1.585** | **238.0%** |
| | | | | | | |
| Funding Schools | Gross Costs | 283.436 | 216.257 | 242.763 | 26.506 | 12.3% |
| | Income | (283.436) | (212.981) | (239.738) | (26.757) | 12.6% |
| | Net | **-** | **3.276** | **3.025** | **(0.251)** | **(7.7%)** |
| | | | | | | |
| **Policy, Performance & Partnership** | | | | | | |
| Policy, Performance & Partnership | Gross Costs | 0.488 | 0.571 | 0.457 | (0.114) | (20.0%) |
| | Income | (0.004) | (0.004) | (0.004) | - | - |
| | Net | **0.484** | **0.567** | **0.453** | **(0.114)** | **(20.1%)** |
| | | | | | | |
| **Finance** | | | | | | |
| Finance, Procurement & Internal Audit | Gross Costs | 19.185 | 18.302 | 18.509 | 0.207 | 1.1% |
| | Income | (9.313) | (9.232) | (8.934) | 0.298 | (3.2%) |
| | Net | **9.872** | **9.070** | **9.575** | **0.505** | **5.6%** |
| | | | | | | |
| Revenues & Benefits - Subsidy | Gross Costs | 133.339 | 133.339 | 136.598 | 3.259 | 2.4% |
| | Income | (133.232) | (133.232) | (136.612) | (3.380) | 2.5% |
| | Net | **0.107** | **0.107** | **(0.014)** | **(0.121)** | **(113.1%)** |
| | | | | | | |
| **Legal & Democratic** | | | | | | |
| Legal & Democratic | Gross Costs | 5.033 | 7.062 | 8.077 | 1.015 | 14.4% |
| | Income | (0.804) | (0.804) | (1.380) | (0.576) | 71.6% |
| | Net | **4.229** | **6.258** | **6.697** | **0.439** | **7.0%** |
| | | | | | | |
| **Communications** | | | | | | |
| Comms & Branding | Gross Costs | 2.156 | 2.318 | 2.195 | (0.123) | (5.3%) |
| | Income | (0.370) | (0.370) | (0.053) | 0.317 | (85.7%) |
| | Net | **1.786** | **1.948** | **2.142** | **0.194** | **10.0%** |
| | | | | | | |
| **HR & Organisational Development** | | | | | | |
| Human Resources & Organisational Development | Gross Costs | 3.777 | 3.558 | 3.389 | (0.169) | (4.7%) |
| | Income | (0.530) | (0.323) | (0.376) | (0.053) | 16.4% |
| | Net | **3.247** | **3.235** | **3.013** | **(0.222)** | **(6.9%)** |
| | | | | | | |
| **Business Services** | | | | | | |
| Information Services | Gross Costs | 17.985 | 16.760 | 15.944 | (0.816) | (4.9%) |
| | Income | (0.290) | (0.287) | (0.420) | (0.133) | 46.3% |
| | Net | **17.695** | **16.473** | **15.524** | **(0.949)** | **(5.8%)** |
| | | | | | | |
| Shared Services & Customer Care/Business Services | Gross Costs | 9.056 | 9.251 | 8.665 | (0.586) | (6.3%) |
| | Income | (3.362) | (3.650) | (3.063) | 0.587 | (16.1%) |
| | Net | **5.694** | **5.601** | **5.602** | **0.001** | **0.0%** |
| | | | | | | |
| Strategic Property Services | Gross Costs | 3.915 | 3.925 | 3.705 | (0.220) | (5.6%) |
| | Income | (1.345) | (1.080) | (0.908) | 0.172 | (15.9%) |
| | Net | **2.570** | **2.845** | **2.797** | **(0.048)** | **(1.7%)** |
| | | | | | | |
| **Transformation Programme** | | | | | | |
| Transformation Programme | Gross Costs | 14.430 | 18.004 | 17.935 | (0.069) | (0.4%) |

# Wiltshire Council Revenue Outturn Statement 2011/2012

| | | Original Budget £m | Revised Budget £m | Actual Position 31-Mar-12 £m | Variation for Year: Overspend / (Underspend) £m | Variation as % of Revised Budget: Overspend / (Underspend) |
|---|---|---|---|---|---|---|
| | Income | (3.638) | (3.661) | (3.059) | 0.602 | (16.4%) |
| | Net | 10.792 | 14.343 | 14.876 | 0.533 | 3.7% |

# Wiltshire Council Revenue Outturn Statement 2011/2012

| | | Original Budget £m | Revised Budget £m | Actual Position 31-Mar-12 £m | Variation for Year: Overspend / (Underspend) £m | Variation as % of Revised Budget: Overspend / (Underspend) |
|---|---|---|---|---|---|---|
| **Economy & Enterprise** | | | | | | |
| Economy & Enterprise | Gross Costs | 4.441 | 5.159 | 8.107 | 2.948 | 57.1% |
| | Income | (0.311) | (0.497) | (3.838) | (3.341) | 672.2% |
| | Net | **4.130** | **4.662** | **4.269** | **(0.393)** | **(8.4%)** |
| **Development Services** | | | | | | |
| Development Services | Gross Costs | 6.661 | 6.579 | 6.484 | (0.095) | (1.4%) |
| | Income | (4.623) | (4.807) | (5.094) | (0.287) | 6.0% |
| | Net | **2.038** | **1.772** | **1.390** | **(0.382)** | **(21.6%)** |
| **Strategic Services, Highways & Transport** | | | | | | |
| Highways Strategic Services | Gross Costs | 9.047 | 9.280 | 9.478 | 0.198 | 2.1% |
| | Income | (1.193) | (1.334) | (2.189) | (0.855) | 64.1% |
| | Net | **7.854** | **7.946** | **7.289** | **(0.657)** | **(8.3%)** |
| Public Transport | Gross Costs | 15.714 | 15.690 | 15.449 | (0.241) | (1.5%) |
| | Income | (3.065) | (3.430) | (4.084) | (0.654) | 19.1% |
| | Net | **12.649** | **12.260** | **11.365** | **(0.895)** | **(7.3%)** |
| Education Transport | Gross Costs | 9.481 | 9.334 | 9.048 | (0.286) | (3.1%) |
| | Income | (0.823) | (0.823) | (0.764) | 0.059 | (7.2%) |
| | Net | **8.658** | **8.511** | **8.284** | **(0.227)** | **(2.7%)** |
| **Waste** | | | | | | |
| Waste | Gross Costs | 32.622 | 29.652 | 29.668 | 0.016 | 0.1% |
| | Income | (3.562) | (3.562) | (3.523) | 0.039 | (1.1%) |
| | Net | **29.060** | **26.090** | **26.145** | **0.055** | **0.2%** |
| **Public Health & Protection** | | | | | | |
| Public Health & Protection | Gross Costs | 5.709 | 6.127 | 6.399 | 0.272 | 4.4% |
| | Income | (1.190) | (1.725) | (2.119) | (0.394) | 22.8% |
| | Net | **4.519** | **4.402** | **4.280** | **(0.122)** | **(2.8%)** |
| **Digital Inclusion** | | | | | | |
| Digital Inclusion | Gross Costs | - | 0.175 | 0.175 | - | - |
| | Income | - | (0.006) | (0.006) | - | - |
| | Net | **-** | **0.169** | **0.169** | **-** | **-** |
| **Corporate Directors** | | | | | | |
| Corporate Directors | Gross Costs | 1.897 | 1.760 | 1.675 | (0.085) | (4.8%) |
| | Income | (0.045) | (0.045) | (0.042) | 0.003 | (6.7%) |
| | Net | **1.852** | **1.715** | **1.633** | **(0.082)** | **(4.8%)** |
| **Corporate** | | | | | | |
| Movement To/From Reserves | | (1.867) | (7.734) | (5.421) | 2.313 | (29.9%) |
| Capital Financing | | 22.321 | 22.915 | 19.920 | (2.995) | (13.1%) |
| Restructure & Contingency | | 7.023 | 4.098 | 6.586 | 2.488 | 60.7% |
| Specific & General Grants | | (32.299) | (34.406) | (35.197) | (0.791) | 2.3% |
| Corporate Levys | | 6.317 | 7.618 | 7.617 | (0.001) | (0.0%) |
| | Net | **1.495** | **(7.509)** | **(6.495)** | **1.014** | **(13.5%)** |
| **Wiltshire Council General Fund Total** | **Gross Costs** | **863.609** | **801.615** | **834.770** | **33.155** | **4.1%** |
| | **Income** | **(533.762)** | **(471.768)** | **(505.139)** | **(33.371)** | **7.1%** |
| | **Net** | **329.847** | **329.847** | **329.631** | **(0.216)** | **(0.1%)** |
| Housing Revenue Account (HRA) | Gross Costs | 22.322 | 22.322 | 22.652 | 0.330 | **1.5%** |
| | Income | (22.733) | (22.733) | (23.193) | (0.460) | **2.0%** |
| | Net | **(0.411)** | **(0.411)** | **(0.541)** | **(0.130)** | **31.6%** |
| **Total Including HRA** | **Gross Costs** | 885.931 | 823.937 | 857.422 | 33.485 | **4.1%** |
| | **Income** | (556.495) | (494.501) | (528.332) | (33.831) | **6.8%** |
| | **Net** | **329.436** | **329.436** | **329.090** | **(0.346)** | **(0.1%)** |

# Wiltshire Council Forecast Variance Movements

| | Reported Period 11 £m | Variance | Variation for Year: Overspend / (Underspend) £m |
|---|---|---|---|
| **Adult Care Operations** | | | |
| Older People | 0.090 | 0.216 | 0.306 |
| Physical Impairment | 0.498 | (0.106) | 0.392 |
| Learning Disability | (0.037) | (0.133) | (0.170) |
| Mental Health | 0.049 | 0.007 | 0.056 |
| Supporting People | 0.805 | (0.234) | 0.571 |
| **Adult Care Commissioning** | | | |
| Resources, Strategy & Commissioning | (0.802) | (0.242) | (1.044) |
| **Communities, Libraries , Heritage & Arts** | | | |
| Community Leadership & Governance | 0.028 | 0.060 | 0.088 |
| Libraries Heritage & Arts | 0.057 | 0.059 | 0.116 |
| **Housing Services** | | | |
| Housing Services | (0.480) | 0.182 | (0.298) |
| **Neighbourhood Services** | | | |
| Highways and Street Scene | 1.190 | 0.018 | 1.208 |
| Leisure | 0.130 | (0.165) | (0.035) |
| Car Parking | 1.400 | (0.185) | 1.215 |
| **Children & Families** | | | |
| Safeguarding | 0.068 | 0.020 | 0.088 |
| Children's Social Care | 0.775 | (0.193) | 0.582 |
| Integrated Youth | (0.375) | 0.235 | (0.140) |
| **Schools & Learning** | | | |
| Early Years | (0.371) | (0.346) | (0.717) |
| School Improvement | (0.127) | (0.272) | (0.399) |
| Business & Commercial Services | 0.031 | (0.061) | (0.030) |
| Targeted Services & Learner Support | (0.488) | (1.380) | (1.868) |
| **Children's Services Commissioning & Performance** | | | |
| Commissioning and Performance | (0.031) | 1.616 | 1.585 |
| Funding Schools | 0.000 | (0.251) | (0.251) |
| **Policy, Performance & Partnership** | | | |
| Policy, Performance & Partnership | (0.105) | (0.009) | (0.114) |
| **Finance** | | | |
| Finance, Procurement & Internal Audit | 0.200 | 0.305 | 0.505 |
| Revenues & Benefits - Subsidy | 0.000 | (0.121) | (0.121) |
| **Legal & Democratic** | | | |
| Legal & Democratic | 0.450 | (0.011) | 0.439 |
| **Communications** | | | |
| Comms & Branding | 0.130 | 0.064 | 0.194 |
| **HR & Organisational Development** | | | |
| Human Resources & Organisational Development | (0.200) | (0.022) | (0.222) |
| **Business Services** | | | |
| Information Services | (1.000) | 0.051 | (0.949) |
| Shared Services and Customer Care/ Business Services | 0.000 | 0.001 | 0.001 |
| Strategic Property Services | (0.300) | 0.252 | (0.048) |
| **Transformation Programme** | | | |
| Transformation Programme | 0.540 | (0.007) | 0.533 |

# Wiltshire Council Forecast Variance Movements

| | Reported Period 11 | Variance | Variation for Year: Overspend / (Underspend) |
|---|---:|---:|---:|
| **Economy and Enterprise** | | | |
| Economy & Enterprise | (0.400) | 0.007 | (0.393) |
| **Development Services** | | | |
| Development Services | (0.180) | (0.202) | (0.382) |
| **Strategic Services, Highways and Transport** | | | |
| Highways Strategic Services | (0.500) | (0.157) | (0.657) |
| Public Transport | (0.620) | (0.275) | (0.895) |
| Education Transport | 0.030 | (0.257) | (0.227) |
| **Waste** | | | |
| Waste | 0.350 | (0.295) | 0.055 |
| **Public Health & Protection** | | | |
| Public Health & Protection | (0.080) | (0.042) | (0.122) |
| **Digital Inclusion** | | | |
| Digital Inclusion | (0.081) | 0.081 | 0.000 |
| **Corporate Directors** | | | |
| Corporate Directors | (0.040) | (0.042) | (0.082) |
| **Corporate** | | | |
| Movement To/ From Reserves | 0.000 | 2.313 | 2.313 |
| Capital Financing | (1.128) | (1.867) | (2.995) |
| Restructure and Contingency | 0.340 | 2.148 | 2.488 |
| Specific and General Grants | 0.000 | (0.791) | (0.791) |
| Corporate Levys | 0.000 | (0.001) | (0.001) |
| | | | |
| **TOTAL FORECAST VARIANCE MOVEMENT** | (0.184) | (0.032) | (0.216) |
| | | | |
| HRA Budget | (0.020) | (0.110) | (0.130) |