Wiltshire Local Development Framework

Wiltshire Housing Site Allocations Development Plan Document (DPD)

Statement of Early Community Engagement

Draft Report – Cabinet Version

June 2017

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Chapter 1 Introduction

- 1.1. The purpose of the Wiltshire Housing Site Allocations Plan, a formal Development Plan Document (DPD), the 'Plan', is twofold to allocate new sites for housing and, where necessary, amend existing settlement boundaries¹. The Plan will identify sufficient land (in the form of sites) across Wiltshire to provide a surety of housing delivery over the plan period to 2026. In addition to identifying sites for housing delivery, the Plan will review settlement boundaries, as defined in the Wiltshire Core Strategy (adopted January 2015) in relation to the Principal Settlements of Salisbury and Trowbridge², Market Towns, Local Service Centres and Large Villages.
- 1.2. This report documents the consultations that have been undertaken to date to engage town and parish councils and other stakeholders in the preparation of the Plan. The table below summarises the engagement that has been undertaken since the council committed to preparing the Plan during the examination of the Wiltshire Core Strategy³. The remainder of the document provides further detail on these consultations undertaken specifically on the emerging Plan.

Consultation	Dates
Formal Regulation 18 consultation on the scope of the Wiltshire Housing Site Allocations DPD:	24 th March – 5 th May 2014
Comments were invited on the scope of the Wiltshire Housing Site Allocations DPD during a six week formal consultation period.	
As part of this consultation developers were invited to submit sites for consideration during the preparation of the Housing Site Allocations Plan through the council's Strategic Housing Land Availability Assessment (SHLAA).	
This 'Regulation 18' consultation was undertaken at the same time as the Regulation 18 consultation on the scope of the Chippenham Site Allocations Plan.	
Informal consultation with town and parish councils on draft proposals for amending settlement boundaries:	28 th July – 22 nd September 2014
To inform the preparation of the Wiltshire Housing Site Allocations DPD, the council undertook an informal consultation with Parish and Town Councils whose area includes settlements with existing	

¹ Wiltshire Local Development Scheme, December 2016: http://www.wiltshire.gov.uk/local-development-scheme-2016-december.pdf

² Please note that there is a separate plan for the Principal Settlement of Chippenham – the Chippenham Site Allocations Plan:

http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/chippenhamsiteallocationsplan.htm

³ Further information on the community engagement undertaken in relation to the Wiltshire Core Strategy can be found on the council's website.

Consultation	Dates
boundary lines.	
Comments were invited on the methodology and draft proposals relating to the review of settlement boundaries over an 8 week period between 28th July and 22nd September 2014.	
As part of this consultation, the council hosted a series of briefing sessions for those parishes affected by the settlement boundary review process at venues in Calne, Salisbury and Trowbridge.	
The decision to directly target town and parish councils was taken because they are elected to represent their respective communities and have detailed knowledge of their local area. However, the council made the consultation materials publically available. Many members of the public submitted representations and the council considered these in the review.	
Informal consultation on the site assessment methodology and initial site options:	23 rd February – 31 st March 2015
Following consultation on the settlement boundaries element of the Plan, the council undertook an informal consultation on the draft methodology for the identification of housing sites and initial site options.	
As part of this consultation, the council again hosted a series of briefing sessions at each of the three Wiltshire Housing Market Areas (HMAs) at Chippenham (North and West HMA), Devizes (East HMA) and Salisbury (South HMA).	
The council also invited town and parish councils to attend one-to- one sessions with the council to discuss how the Plan affects their area.	
In addition to the consultation targeted at town and parish councils, the council held a workshop event for developers and landowners in Trowbridge, and invited comments on the draft methodology.	
Informal consultation on the approach to Large Villages	30 th June – 12 th August 2015
Following on from the consultation on the site assessment methodology which asked town and parish councils if they believed housing sites should be identified in Large Villages, the Council undertook a further, informal consultation on the Wiltshire Housing Site Allocations DPD to provide another opportunity for parish councils with Large Villages to input into the preparation of the Plan.	
A questionnaire and site maps, which showed the location of all of the SHLAA sites in their Large Villages, were emailed to all 66 parish councils with Large Villages, inviting comments on each of the SHLAA sites and asking a series of questions including; if they were preparing a neighbourhood plan and what progress had been made with it, what they believed an acceptable level of housing growth in	

Consultation	Dates
their Large Village up to 2026 would be and their views on the identification of housing sites in their Large Villages.	
Landowner deliverability consultation	21 st August – 2 nd October
The council contacted the landowners or promoters of all SHLAA sites that had been carried forward after the application of the strategic criteria. This was applied to eliminate any sites that were not suitable and did not meet the criteria for further assessment.	2015
The council requested confirmation that the land was available and deliverable within the Plan period and requested any further details that landowners or promoters may have about the site that would assist the assessment process.	

Table 1.1 - summary of consultations undertaken on the Wiltshire Housing Site Allocations DPD

Conformity with Wiltshire Council's Statement of Community Involvement

- 1.3. The Statement of Community Involvement (SCI) provides the community clarity on the levels of involvement they should expect in planning processes. The council's first Statement of Community Involvement (SCI)⁴ was adopted in February 2010 to be in accordance with consultation requirements in force at that time. Since then, the Government has introduced changes to the planning system which resulted in streamlining the process of plan preparation. As a consequence the council updated its SCI in July 2015. Consultations on the emerging Wiltshire Housing Site Allocations Plan spans this time period and have been carried out to be in accordance with the relevant adopted SCI and Town and Country Planning Regulations in force at the time of consultation.
- 1.4. The February 2010 SCI identified several broad opportunities for community involvement in the preparation of a DPD:
 - Evidence gathering (informal)
 - Early community involvement (informal)
 - Draft document (informal)⁵
 - Publication/submission to the Secretary of State (formal)
 - Independent examination (formal)
- 1.5. The consultations that took place in 2014 were a combination of evidence gathering and early community involvement. The consultations carried out in summer 2014 (on settlement boundaries) and early 2015 (on the site assessment methodology and initial housing site options) represent a continuation of the early

⁴ Statement of Community Involvement (February 2010) http://www.wiltshire.gov.uk/statement_of_community_involvement_february_2010.pdf

⁵ Production of a draft document is no longer a requirement of the plan making process, Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

- community involvement as the council worked towards a draft Plan, although still on an informal basis.
- 1.6. The consultation strategy used to develop the Wiltshire Housing Site Allocations Plan was created to reflect the scope of the Plan. The consultation undertaken is considered to be in line with the Council's SCI, as well as the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), and appropriate to the Plan. The remainder of the document summarises the nature and outcomes of consultation undertaken to date.

Chapter 2 Formal Regulation 18 consultation on the scope of the Wiltshire Housing Site Allocations DPD (March – May 2014)

- 2.1. Comments were invited on the scope of the Plan (Regulation 18) during a six week consultation period between Monday 24th March and Monday 5th May 2014 (inclusive). A total of 342 comments were received from 234 parties during the consultation. A separate report provides further details of this consultation.
- 2.2. The majority of comments received related to the following matters:
 - Infrastructure and facilities
 - Traffic and parking
 - Neighbourhood plans
 - Character of areas
 - Brownfield or greenfield sites
 - Settlement boundaries
 - Potential SHLAA sites
- 2.3. The consultation also included a Call for Sites. In total, 207 responses were potential SHLAA sites put forward by landowners and developers.
- 2.4. Key outcomes arising from the consultation include:
 - Infrastructure and facilities: The council to identify the necessary
 infrastructure requirements for allocated sites in the Plan through its
 infrastructure planning evidence base. Specific details of infrastructure
 projects will be identified and progressed through the planning application
 process.
 - Traffic and parking: As above, but also the council to undertake sitespecific transport assessments as part of the planning application process.
 - Character of areas/brownfield or greenfield sites: The council to ensure that any applications comply with the relevant policies within the Wiltshire Core Strategy.

- Settlement boundaries: The council to review all consultation feedback and take it into account when developing the methodology for the assessment of sites and the review of settlement boundaries.
- Potential SHLAA sites: Sites identified through the consultation will be appraised as part of the site assessment methodology developed for the Plan

Chapter 3 Informal consultation with town and parish councils on draft proposals for amending settlement boundaries (July – September 2014)

- 3.1. Comments were invited on draft proposals for the revision of settlement boundaries during an eight week informal consultation period between Monday 28th July and Monday 22nd September 2014 (inclusive).
- 3.2. This consultation proposed a draft revised settlement boundary for Principal Settlements, Market Towns, Local Service Centres and Large Villages. It specifically targeted town and parish councils; as they requested to be consulted first before any formal public consultation was undertaken. As such 115 town and parish councils with settlements that were involved in the proposed boundary changes were notified of the consultation and invited to attend one of three briefing sessions held in July 2014 in Calne, Salisbury and Trowbridge.
- 3.3. A total of 352 responses were received from 136 parties during this consultation period. A separate report provides further details of this consultation.
- 3.4. The majority of comments received related to the following matters:
 - Comprehensiveness of the consultation process
 - Consistency of applying the methodology across all the settlements
 - Inclusion/ exclusion of large gardens
 - Inclusion/ exclusion of planning permissions and site allocations
 - Effect on housing delivery
 - Relationship with neighbourhood plans
- 3.5. Key outcomes arising from the consultation include:
 - The council to consider what supporting information could be provided to accompany the revised settlement boundary maps
 - The council to provide an explanation of each change made to the original settlement boundaries, linked to the relevant criteria in the methodology
 - The council to consider removing allocations/ development proposals/ planning permissions from within the settlement boundary

- The council to consider including curtilages of properties, including gardens
- The council to consider retaining land included in the existing settlement boundaries, except where this would conflict with the methodology
- The council to consider proposed amendments to settlement boundaries within sufficiently advanced neighbourhood plans.
- 3.6 The influence the consultation had on the method to review settlement boundaries is contained in Topic Paper 2: Settlement Boundary Review Methodology Paper.

Chapter 4 Informal consultation on the site assessment methodology and initial site options (February – March 2015)

- 4.1. Comments were invited on the methodology and initial findings relating to the identification of housing allocations during a five week informal consultation period between Monday 23rd February and Tuesday 31st March 2015 (inclusive).
- 4.2. This consultation proposed a site selection methodology and explained how and when it had been applied to individual settlements. For the principal settlements, market towns and local service centres, maps were created to show the stage at which sites had been excluded and refined options had been identified. In addition, a series of questions were posed to help generate feedback on a number of specific topics, all of which were considered to go to the heart of the Plan.
- 4.3. The consultation materials were publicly available to view and comments were welcomed from all parties. However, the consultation was targeted at town and parish councils who were all directly notified of the consultation and invited to attend one of three briefing sessions held in February/ March 2014 in Chippenham, Devizes and Salisbury. Town and parish councils were also offered the opportunity to attend one-to-one meetings with planning officers at the council's offices in Salisbury and Trowbridge, to further understand what the plan would mean for their area.
- 4.4. In response to comments on the informal consultation on draft proposals for settlement boundaries, the council was also keen to engage with landowners, developers and agents during this consultation and so held a 'Developer Forum' in Trowbridge on Thursday 5th March 2015.
- 4.5. A total of 2,100 comments were received from 549 organisations / individuals during this consultation period. Individual responses and representations received are contained in a separate report.

Summary of consultation feedback

- 4.6. The main issues raised during the consultation have been grouped into themes together with matters requiring further consideration in developing the site assessment methodology. The majority of comments received related to the following matters:
 - Housing sites in Trowbridge, specifically land within the 'Hilperton Gap'
 - Housing sites in Salisbury, specifically site 'SAL2'
 - The methodology and other sites across Wiltshire.
- 4.7. The main issues that arose from the consultation relating to the draft methodology can be summarised as:
 - The approach to identifying potential 'areas of search'. Three options have been identified for taking forward the approach to areas of search
 - Maintain the current position in terms of the methodology for identifying areas of search – i.e. identify potential housing sites / options in areas of search with a requirement of more than approximately 50 dwellings for the remaining plan period up to 2026.
 - Enable sites to be identified in areas of search with a requirement of less than approximately 50 dwellings.
 - Enable sites to be identified in any area of search even if the requirement has been met.
 - For the overall methodology the following issues were identified as needing further consideration
 - Reconsider the application of certain strategic and discretionary criterion to determine if they are applied/considered at the most appropriate stage.
 - Consider the appropriateness and use of additional assessment criteria to determine site suitability.
 - Reconsideration of the overall discretionary 'scoring' process of site assessment and application of accessibility criteria.
 - Whether to allocate Previously Developed Land (PDL) within existing settlement boundaries through the plan or whether to allow national and local policy to deliver this.
 - The appropriateness of grouping sites into 'options' or whether to solely present sites individually.

- Determine whether it is necessary and feasible to undertake 'local needs assessments' to feed into the methodology and assessment process.
- The approach to large villages in particular the need to:
 - o Consistently identify site allocations at all Large Villages.
 - Identify site allocations at some Large Villages, based on need, suitability of sites and local policy constraints.
 - Amend Core Policy 2 to provide a more permissive policy approach towards sites outside of settlement boundaries.
 - Develop a criteria based approach to housing development in the Community Area Remainders to address housing supply whilst maintaining a degree of control of where such development should take place by taking into account local need and policy constraints.
- 4.8 The comments summarised above have been used to inform a revised site selection methodology. The way the site selection methodology has been informed by consultation findings is set out in the separate full report on the informal consultation on the site assessment methodology and initial site options.

Chapter 5 Informal consultation on the approach to Large Villages (June to August 2015)

- 5.1. Comments were invited on the approach to Large Villages during a six week consultation period between Tuesday 30th June and Wednesday 12th August 2015 (inclusive).
- 5.2. The previous consultation on the site assessment methodology and initial site options, held between February and March 2015, asked a series of questions about the approach taken by the council, including whether or not the Wiltshire Site Allocations DPD should identify sites for new housing in Large Villages. The majority of comments received during that consultation supported the principle of identifying housing sites in Large Villages. However, not all parish councils provided a response and the council was keen to hear from more parish councils with Large Villages, as the response from these was relatively low.
- 5.3. Therefore, this consultation provided another opportunity for parish councils with Large Villages to comment on the approach to Large Villages. The council wrote to all 66 parish councils with Large Villages, including a questionnaire and maps of SHLAA sites. The council invited comments on their views on potential

development sites in each Large Village. The consultation was also an opportunity for parish councils to update the council on any ongoing neighbourhood plan work.

- 5.4. A total of 38 responses were received from parish councils. A separate report provides further details of this consultation.
- 5.5. The majority of comments received related to the following matters:
 - General attitude towards new development
 - Relationship between housing and the settlement boundaries
 - Infrastructure constraints, including highways, sewage and drainage, amenities, schools and health services
 - The progress of neighbourhood plans, including whether it was seeking to allocate land for housing in Large Villages.
- 5.6. Feedback from this consultation will assist the council in understanding:
 - locally specific issues
 - the sites that are preferred over others (and why), and
 - the level of growth supported in each village.

Chapter 6 Landowner Deliverability Consultation

- 6.1. Confirmation was requested from landowners and site promoters on the availability and deliverability of their SHLAA sites during a three week consultation period between Friday 21st August and Friday 11th September 2015 which was then extended to Friday 2nd October.
- 6.2. The Council contacted the land owners or promoters of all sites that had been carried forward after the application of the strategic criteria in the site assessment methodology, (which sought to eliminate any sites that were not suitable and did not meet the criteria for further assessment). Landowners or site promoters were sent a letter or email requesting confirmation that the land was available and deliverable within the plan period and also requested any further details that they may know about the site to aid in the assessment process.
- 6.3. After the initial deadline had passed the Council collated the responses and recontacted the land owners or promoters that had not responded to the initial letter.
- 6.4. A separate report provides further details of this consultation.

- 6.5. Key outcomes arising from the consultation include:
 - Sites taken out of the SHLAA, marked as not available and removed from further consideration, where the landowner stated they no longer wanted them included
 - Sites removed from further consideration and recorded as having an unknown availability where:
 - the landowner had not responded
 - the land was not registered, or
 - the land title was pending.
 - Sites were considered available and taken forward for further assessment where:
 - they had been confirmed as available and deliverable within the plan period
 - they had been submitted or promoted during previous consultations during the preparation of the plan.

Chapter 7 Next steps

- 7.1. The next stage of public consultation on the Wiltshire Housing Site Allocations DPD will be the formal Regulation 19 consultation on the draft Plan. This consultation will invite comments on the soundness of the Plan and the supporting evidence base. The Plan will then be submitted to the Secretary of State, who will appoint an independent Planning Inspector to conduct an Examination in Public (EiP) into the Wiltshire Housing Site Allocations DPD.
- 7.2. The consultation report on the formal consultation on the Wiltshire Housing Site Allocations DPD will be published separately following the consultation when the Plan is submitted.

Additional consultation reports

The following consultation reports have been prepared to provide further detail on the community engagement undertaken on the Plan and summarised in this report.

- Report on the Regulation 18 consultation, 24th March 5th May 2014
- Report on the informal consultation with town and parish councils on draft proposals for amending settlement boundaries, 28th July – 22nd September 2014
- Report on the informal consultation on the site assessment methodology and initial site options, 23rd February – 31st March 2015
- Report on the informal consultation on the approach to Large Villages, 30th June 12th August 2015
- Report on the landowner deliverability consultation, 21st August 2nd October 2015