

Wiltshire Council

Cabinet

11 July 2023

Subject: Wiltshire Local Plan Review - Pre-Submission Draft Plan

Cabinet Member: Cllr Nick Botterill - Cabinet Member for Finance, Development Management and Strategic Planning

Key Decision: Key

Executive Summary

The Wiltshire Local Plan Review has been in development since 2017. A Pre-Submission Draft Plan (the Plan) has now been prepared. It has been informed by evidence, significant engagement with the local community and statutory consultees and has responded to changes in national planning policy over that time. The Plan is one of the most significant strategic documents for the council and will pave the way for sustainable growth up to 2038. Updating the Plan is a key priority and will ensure that Wiltshire benefits from plan-led development that best meets the growing needs of our communities and the protection an up-to-date plan brings. It has been informed by services across the council to ensure that their needs are taken into account where appropriate.

The Plan is a review of the current Wiltshire Core Strategy, not a new plan. It therefore builds on the existing objectives and spatial strategy to address Wiltshire's needs for new homes, jobs and infrastructure over the period 2020 to 2038, whilst protecting and enhancing the environment. It plans for 36,740 homes (of which over 21,900 homes have already been built or are committed) and around 160ha hectares of employment land over 18 years, a reduction compared to the 45,630 homes consulted on in 2021. The homes in the Plan are no more than required by the Government's standard methodology.

Policies have been reviewed to ensure they are consistent with up-to-date national planning policy and can effectively inform planning decisions, as well as align with the council's adopted Business Plan. New policies are proposed to support Wiltshire in moving towards carbon neutrality including zero carbon homes and securing biodiversity net gain. There is also a greater emphasis on ensuring new homes meet the needs of Wiltshire's residents through setting new affordable housing policies, requiring minimum space standards and adaptable and accessible homes standards to enable people to live in their homes longer.

In preparing the Plan, over 170 saved former district council policies that currently form part of the development plan have also been reviewed and either deleted or incorporated into the Plan.

The council has reached the final consultation stage, where representations are invited on soundness and legal compliance, which is known as the Regulation 19 stage. The council will be publishing what it considers to be a sound Plan.

Completion of this stage will enable the council to formally submit the Plan and for it to be examined in public by an independent Planning Inspector appointed by the Secretary of State. It is only once these stages have been completed, with a positive recommendation by the Inspector, that the Plan can be adopted by the council and gain full weight in decision making.

Publication of the Pre-Submission Draft Plan for consultation is proposed to start towards the end of September for a period of at least 6 weeks in line with legislation and the council's adopted statement of community involvement.

Following the consultation, once the outcomes has been considered a report will be brought back to Cabinet and Council, in order that the Plan can be approved for submission.

Proposal(s)

That Cabinet:

- (i) Endorses the Wiltshire Local Plan Review - Pre-Submission Draft Plan at Appendix 1 subject to amendment in (iii).**
- (ii) Recommends to Full Council on 18 July 2023 that the Wiltshire Local Plan Review - Pre-Submission Draft Plan at Appendix 1 (subject to modification in (iii)) be approved for publication in line with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), for a period of at least six weeks public consultation.**
- (iii) Authorises the Director for Planning, in consultation with the Director for Legal and Governance and Cabinet Member for Finance, Development Management and Strategic Planning, to: make any necessary minor changes to the Pre-Submission Draft Plan before it is published; and to enable the finalising of the associated evidence documents for publication alongside the Plan; and to make arrangements for, and undertake statutory consultation.**

Reason for Proposal(s)

To ensure the council continues to make progress in updating its Local Plan, in line with the timescale set out in the recently approved Local Development Scheme and statutory requirements.

Terence Herbert
Chief Executive

Wiltshire Council

Cabinet

11 July 2023

Subject: Wiltshire Local Plan Review

Cabinet Member: Cllr Nick Botterill - Cabinet Member for Finance, Development Management and Strategic Planning

Key Decision: Key

Purpose of Report

1. To:

- (i) Seek Cabinet's endorsement to recommend to Full Council that the Pre-submission Draft Wiltshire Local Plan Review be formally published for a final stage of consultation; and
- (ii) Set out the arrangements for consultation and the next steps.

Relevance to the Council's Business Plan

2. The main purpose of the Local Plan is to plan for the needs of Wiltshire's growing communities from an economic, environmental and social perspective to ensure the delivery of sustainable development. This aligns with the four missions of the 2022 to 2032 Business Plan - Thriving Economy, Resilient Society, Sustainable Environment and Empowered People. The importance of updating the Local Plan to provide an effective policy framework for sustainable growth of Wiltshire is referred to explicitly.

Background

3. The council has a statutory duty to prepare and maintain their Local Plan. The Wiltshire Local Plan Review is a review of the Wiltshire Core Strategy (adopted 2015) and has been in preparation since 2017 during which time the council has gathered evidence, undertaken extensive consultation to inform the plan and responded to changes in national planning policy. A summary of the work completed is provided below:
 - (i) In winter 2017, consultation was undertaken on the proposed scope and content of the Local Plan Review in line with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), following approval by Cabinet on [10 October 2017](#).
 - (ii) Late 2018, informal consultation took place with town and parish councils in relation to the main towns and rural areas to consider where growth could take place and at what scale.

- (iii) On [26 March 2019](#) Cabinet considered the initial findings of the 2018 consultation and implications of changes to the National Planning Policy Framework published in July 2018 and February 2019; which saw the introduction of the Government's standard method for housing.
- (iv) On [30 April 2019](#), Cabinet endorsed a housing range for Wiltshire of between 40,840 homes and 45,630 homes as the basis to test and then inform an appropriate local plan housing requirement for the plan period (2016-2036); and agreed to a number of alternative development strategies for each of Wiltshire's four housing market areas as a basis for testing the upper end of the range and to develop a preferred strategy for the Plan.

At this time, it was determined that there was no need to continue with a Joint Spatial Framework with Swindon Borough Council as each authority would be planning to meet their own needs in their own areas.

- (v) Following the April 2019 Cabinet, meetings were held with representatives of town and parish councils (and neighbourhood plan groups): on a Main Settlement (the Principal Settlements and Market Towns) basis to consider the different growth options alongside the outcomes they could help to deliver (place shaping priorities); and for the rural area to develop policies for rural settlements including their role in the provision of new homes. A developers' forum was also held.
 - (vi) In [December 2020](#) Cabinet approved a further consultation under Regulation 18 to inform the Wiltshire Local Plan Review. This took place early 2021 and sought comments on an Emerging Spatial Strategy including proposals for the scale and distribution of growth across Wiltshire, possible development sites, the role of rural settlements and the role of the Local Plan in helping the county adapt to and mitigate for climate change.
 - (vii) The outcome from the consultation (which took place 13 January 2021 to 9 March 2021) and main issues raised were reported to Cabinet on [29 June 2021](#). At that meeting it was agreed to undertake further work in response to the consultation on key parts of the evidence base including:
 - A review of the scale and distribution of forecast housing need for the plan period.
 - A review of the employment evidence underpinning the need for employment land; and
 - Wiltshire wide assessment of potential for renewable energy, zero carbon development and off grid energy networks at main settlements.
4. Informal engagement has also been ongoing throughout the process with key stakeholders including internal and external infrastructure providers, neighbouring authorities and statutory bodies including Natural England, Environment Agency, Historic England and National Highways.
5. The further work has now been undertaken and a Pre-Submission Draft Plan (the Plan) has been prepared, which is provided at **Appendix 1**.

6. The council's Local Development Scheme envisages publication of the draft Plan in Q3 of this year for pre-submission consultation, also known as the Regulation 19 stage. At this stage in the process, the council is publishing what it considers to be a legally compliant and sound plan.

Main Considerations for the Council

7. The council has a statutory duty to maintain an up-to-date Local Plan. The National Planning Policy Framework advises that the planning system should be genuinely plan-led with succinct and up-to-date plans providing a positive vision for the future of the area. Substantial time and investment have been made in preparing the Plan including engagement with the local community and other stakeholders, as illustrated above.
8. The Plan is one of the most significant strategic documents for the council and will pave the way for sustainable growth up to 2038. Updating the plan is a key priority and will ensure that Wiltshire benefits from plan-led development that best meets the growing needs of Wiltshire's communities and the protection an up-to-date plan brings.
9. Since the previous consultation early 2021 significant work has been undertaken to shape the draft Plan and the evidence underpinning it, including the following:
 - (i) An updated Local Housing Need Assessment has been completed, which addresses the concerns about planning for a housing need higher than the standard method. This identifies a need of approximately 36,740 homes over the period 2020 to 2038. (The base date of the Plan has been updated from 2016 to 2020 and the plan horizon extended by two years to look ahead to 2038 in response to comments received in the 2021 public consultation).
 - (ii) Employment forecasts have been updated to inform the need for employment land. A 'central scenario' has been used, which considers the mid-point between different forecasts by Cambridge Econometrics and Oxford Economics that have assessed the impacts of both COVID-19 and Brexit. This supports the overall housing need for Wiltshire indicating a balance between workers and homes.
 - (iii) A revised spatial strategy has been prepared that is in line with the settlement strategy and sets out levels of growth for Wiltshire's main settlements. It considers the updated needs assessments, consultation responses and evidence on ability of settlements to accommodate further growth.
 - (iv) Transport assessments have been undertaken to assess the impact of growth on the transport network, understand how land use can manage impacts and help move towards carbon neutrality, and identify appropriate mitigation. They have informed development of policies and proposals in the Plan.
 - (v) Allocations have been proposed where appropriate at the Main Settlements (Principal Settlements and Market Towns) to increase the supply of housing and employment land across Wiltshire taking into account the options available, and policies developed to provide a strategy to improve supply further responding to opportunities for sustainable growth, including windfall sites, over the plan period. A paper on housing delivery has been prepared

- to demonstrate the sources of new homes over the plan period and to demonstrate a five-year housing land supply.
- (vi) Revised methodologies have been developed to carry out the duty of providing neighbourhood plans with housing requirements for their review and preparation.
 - (vii) Review of policies to support vitality of rural settlements, to allow for affordable housing, employment and community facilities.
 - (viii) A renewable energy study for Wiltshire has been completed, which has informed revised policy to support renewable energy schemes locally.
 - (ix) A Wiltshire Open Space Study has been completed to support the use of new open space standards across the county through updated policy.
 - (x) New policies have been created to introduce standards for sustainable construction to help support Wiltshire in moving towards carbon neutrality and the ambition for zero carbon development; and securing biodiversity net gain.
 - (xi) Viability Assessment has been undertaken to understand the cost implications of policies on development, which demonstrate that when policy costs including infrastructure and other standards/requirements have been taken into account policies and development proposals are deliverable.

10. At the Regulation 19 stage, the council is publishing what it considers to be a sound Plan that meets all the necessary legal requirements. See Legal Implications below. To be sound, as set out in the National Planning Policy Framework (paragraph 35), a Plan must be:

- (i) **Positively prepared** - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need is accommodated where it is practical to do so and is consistent with achieving sustainable development.
- (ii) **Justified** - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.
- (iii) **Effective** - deliverable over the plan period, and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
- (iv) **Consistent with national policy** - enabling the delivery of sustainable development in accordance with policies in the National Planning Policy Framework.

Draft Plan

11. The Plan, at **Appendix 1**, is a review of the current Wiltshire Core Strategy and saved policies of the former district council, not a new Plan. It therefore builds on the existing vision, objectives and spatial strategy to address Wiltshire's needs for new homes, jobs and infrastructure over the period to 2038, whilst protecting and enhancing the environment. Policies have been reviewed and new policies developed to ensure the Plan is consistent with up-to-date national planning policy, supports delivery of sustainable development and can effectively inform planning decisions in Wiltshire. Considerable evidence has been prepared to underpin the Plan's policies and proposals.

12. Alongside the review of policies within the Wiltshire Core Strategy, the remaining saved former district council policies (over 170 policies - as set out in Appendix D, Wiltshire Core Strategy) that form part of the development plan have also been reviewed to see whether these can be deleted, or their policy provisions should be brought into the Plan.
13. A schedule of policies is provided in **Appendix 2** summarising the outcome of the policy review and the changes that have been made to existing policies or where new policies have been developed. This also includes a summary of saved policies and explains why they are proposed for deletion or incorporation into the Plan.
14. The draft Plan follows a similar structure to the Wiltshire Core Strategy and is summarised below:
 - (i) Chapters 1 to 2 explain the role and purpose of the Plan; include a refined vision for the plan period to 2038, 6 strategic objectives and outcomes; together with an updated key diagram to reflect the revised Plan.
 - (ii) Chapter 3 contains the Spatial Strategy for Wiltshire; setting the overall scale of growth for the plan period to 2038, how development will be delivered including the role of different types of settlements to reflect Wiltshire's distinctiveness, how infrastructure will be provided to support growth and a new policy on 'Addressing Climate Change'.
 - (iii) Section 4 contains the Area Strategies. These are based on four (housing market) areas sub-dividing the County - around Chippenham, Salisbury, Swindon (within Wiltshire, outside of Swindon Borough), and Trowbridge. Policies are set out for each of the main settlements (principal settlements and/or market towns) and rural part of the housing market area. These include place shaping priorities distinctive to each main settlement to guide development, scales of growth for homes and jobs over the plan period, existing and new allocations for development, and the role of neighbourhood plans in supporting strategic policies of the Plan at the Main Settlements and in the rural area.

At some settlements that are more constrained, reserve sites have been identified, which will be drawn on should there be a shortfall in five-year housing land supply. The settlements of Chippenham, Melksham and Trowbridge are identified as broad locations for growth, where urban extensions can be identified for the longer-term. Within the Salisbury housing market area, an area of search has been identified for a new community. Both broad locations for growth and a new community would only be brought forward through a new Local Plan.

The scale of housing and distribution and the role of settlements for the main towns and rural areas is discussed in more detail below.

- (iv) Section 5 contains development management policies to complement the other policies in the Plan and is structured around the 6 six plan objectives. These have been reordered around the three dimensions of sustainable development as follows:
 - Economic - 'delivering a thriving economy' and 'ensuring that essential infrastructure is in place to support our communities'.

- Social - 'providing everyone with access to a decent, affordable home'; 'helping to build resilient communities'.
- Environmental - 'addressing climate change' and 'protecting and enhancing the natural, historic and built environment'.

Scale of housing and distribution

15. The updated housing need assessment, which uses the Government's standard method for calculating such needs, results in a figure of about 36,740 homes over the period 2020 to 2038. This equates to 2,041 homes per annum. The overall need has been distributed to Wiltshire's four housing market areas using up to date population data to ensure that the new homes are provided where they are needed. The number of homes for each area have also been tested to see whether they align with revised economic forecasts and generate sufficient workers (economically active) to meet job forecasts and support Wiltshire's economic growth. This has confirmed a broad alignment of workers to jobs.
16. The overall level of homes is lower than the 45,630 homes consulted upon in 2021, which equated to 2,268 homes per annum and included an uplift on top of the standard method.
17. The updated evidence on housing needs and their broad distribution to housing market areas has led to increases in assessed need for new homes in both the Swindon and Salisbury housing market areas, with reductions in the Chippenham and Trowbridge areas. As a result, the emerging spatial strategy consulted on in 2021 has been revised to take into consideration the changes in the broad distribution of growth, consultation response and evidence about the ability of settlements to accommodate further development including their environmental constraints. Generally, this has meant the same broad distribution and relationships between settlements established in the emerging spatial strategy for three of the areas. The Revised Spatial Strategy is set out in an accompanying evidence paper to this report, which can be accessed via this [link](#).
18. For the Salisbury area it has been necessary to test new alternative development strategies through sustainability appraisal. This is because of a lack of suitable sites at Salisbury and Amesbury to accommodate higher levels of growth over the plan period and potential for unacceptable harm due to environmental impact, notably the specific landscape and considerable historic environment constraints for these places.
19. The further testing of alternative development strategies and options considered a more dispersed approach that would see the rural settlements accommodating more growth; new settlements at both a larger and smaller scale; and higher growth at Ludgershall. This testing has led to a revised spatial strategy for the Salisbury area that includes additional growth at Ludgershall and a possible new community to the north of Salisbury. Both these latter measures are longer term and will not help meet development needs in the early years of the plan. Further information is provided in the Revised Spatial Strategy paper.
20. Pollution of the River Avon (Hampshire) Special Area of Conservation (SAC) is a significant and on-going issue affecting the pace at which development can be brought forward in the south of the county. Levels of pollution in the River Avon SAC are affected by both discharge from wastewater treatment works and water

abstraction (quality and quantity). In combination with the actions of water companies/regulators, Natural England and Environment Agency, the Plan will need to contribute towards restoring this protected watercourse to a favourable condition. To achieve this, a mitigation strategy ensures that development has at least a neutral effect on pollution levels. Under the Habitats Regulations planned development should have no adverse effect on the integrity of the River Avon SAC. The mitigation strategy however is interim in advance of more far-reaching measures being put in place by the water industry. Until there is certainty that a combination of measures will fully address phosphates, housebuilding in the catchment of the River Avon SAC cannot proceed at a rate to meet forecast needs beyond delivering current commitments.

21. Evidence on land availability and pollution of the River Avon SAC has therefore led to the development of stepped housing requirements for Wiltshire as a whole, as set out in Table 1 below, which will be used to assess plan delivery. They allow for a slower rate of development in the early part of the plan period to allow time to both investigate the need and location for a new community (for around 1,500 to 2,000 homes) and to implement new measures to reverse the effects of pollution in the River Avon SAC.

Phase	No. of homes
Pre-plan adoption: 2020-2024 (4 years)	8,080
Phase 1: 2024-2031 (7 years)	10,290
Phase 2: 2031-2038 (7 years)	18,370
Total	36,740

Table 1: Wiltshire Housing Requirement

22. A [Housing Delivery paper](#), which accompanies this report clarifies how the plan makes provision for a sufficient rate and scale housing development to meet forecast needs and sources of supply, as well as providing the homes to meet the needs of Wiltshire’s residents. This includes setting new affordable housing policies, requiring minimum space standards and adaptable and accessible homes standards to enable people to live in their homes until they reach an older age.

Planning for Wiltshire’s main settlements

23. Supporting evidence documents, as listed in **Appendix 3**, have been prepared for each of the Main Settlements to explain their role, specific policies in the Plan relating to each place and how development should take place over the plan period. As described above they include place shaping priorities to guide development, scale of development, allocations for development (current and new) including what infrastructure needs to be delivered alongside these. Housing requirements are set out for neighbourhood plans to clarify their role alongside the Local Plan in providing for new homes. Overall, around 40% of homes are to be accommodated at the three Principal Settlements of Chippenham, Salisbury and Trowbridge over the plan period, with around 36% at the other Market Towns.
24. In some Main Settlements, reserve sites have been identified to allow additional allocations to be brought forward to improve supply relatively quickly should they be needed or should a Town or Parish Council choose to release these for development through their neighbourhood plans. Chippenham, Melksham and Trowbridge are identified as settlements, which should be strategically planned in the longer term and where further urban extensions will be identified towards the

end of the Plan period to help need for homes, employment, and associated infrastructure. These broad locations for growth are intended to be identified through a new Local Plan.

Planning for the rural area

25. The Revised Spatial Strategy identifies the rural parts of Wiltshire outside of the main settlements (excluding the new community referred to in paragraph 21), as providing for around 20% of Wiltshire's housing need over the plan period. The majority of this is expected to be developed at Wiltshire's Local Service Centres and Large Villages which are best places to support rural growth as they contain jobs, businesses, services, and facilities to help meet the needs of the communities they serve, as well as their local catchments. It is important that these communities can grow in a proportionate way to help sustain them.
26. As experienced through preparation of the Wiltshire Housing Site Allocation Plan, it is often the local communities themselves who are best placed to determine how these smaller settlements should change to accommodate growth through preparing neighbourhood plans. While there was some challenge to this proposition through the last consultation it wasn't significant and came more from developers promoting land rather than the communities themselves. However, following the 2021 consultation the methodology for distributing housing to these communities has been amended and simplified. This takes into account factors such as the size of settlements, recent growth, their constraints, and capacity of primary schools and health facilities. The Rural Housing Requirements Paper [Rural Settlement Housing Requirements](#) paper provides further information on the methodology and outputs for each settlement.
27. For parishes with Small Villages, there will be a no explicit requirement due to these not having the same strategic role as larger villages with greater concentrations of business, services and facilities. However, this does not mean there can be no additional growth in these areas. New housing development will be limited to infill in the built-up area (which will no longer be restricted to 1 or 2 homes) or should be geared towards meeting local affordable needs through rural exception sites of up to 20 homes or 5% of the size of the settlement (whichever is the lower).

Next Steps and Consultation Arrangements

28. Completion of this stage will enable the council to formally submit the Plan (following approval by Cabinet and Council) and for it to be examined by an independent Inspector appointed by the Secretary of State. It is only once these stages have been completed, with a positive recommendation by the Inspector, that the Plan can be adopted by the council and gain full weight in decision making.
29. Subject to Cabinet and Council approval, preparations will be made to finalise and publish the consultation documents including the draft Plan. By the start of the consultation, they will be made available for public inspection at the council's principal offices during normal opening hours as well as on the council's website. Consultation needs to be undertaken for a period of at least six weeks in line with legal requirements and the Council's Statement of Community Involvement. In keeping with the December 2022 update to the Local Development Scheme, this is

planned to commence by end of September (Q3, 2023) and is proposed to include the following:

- (i) Online publication of all consultation documents on the Council's website including consultation portal.
- (ii) All consultation documents will be available for viewing at the council's main office hubs and/or council libraries as appropriate.
- (iii) Press release and publication of adverts in local newspapers to cover Wiltshire advertising the start of the consultation.
- (iv) Notifications to be sent to all Members and Town and Parish Councils.
- (v) Publicise through residents' newsletter (27,000+ subscribers)
- (vi) Email/letter to consultees on spatial planning consultation database informing them of the consultation.
- (vii) Social media campaign to raise awareness of the consultation and how to engage.
- (viii) Mix of in person and online engagement events.
- (ix) Chair's announcements at Area Board meetings leading up to and at the start of the consultation, where possible, to publicise the consultation and raise awareness of the consultation events.

30. Once the Regulation 19 consultation has been completed, and responses collated and a consultation report produced including the main issues raised, the Plan, following approval by Cabinet and Council, can be submitted and proceed to examination in public (EiP). The EiP is the final stage in the process and upon submission, the Inspector will take control of the process. In some cases, more than one Inspector is appointed to undertake the EiP. The Inspector's role is to examine whether the plan meets the test of soundness defined in the National Planning Policy Framework (paragraph 35). They require that the plan is positively prepared, justified, effective and consistent with national policy and meets all the relevant legislative requirements, including the duty to cooperate. The EiP focuses on the main issues that purport to affect the Plan's soundness and legal compliance.

31. At the end of the EiP the Inspector produces a report on behalf of the Secretary of State setting out recommendations and the reasons for them. The outcome could be one of three: (i) that the plan is sound and legally compliant as submitted and should be adopted; (ii) the plan is unsound and/or legally non-complaint as submitted but it is possible to make it so through main modifications, if requested to do so by the Council as local planning authority; (iii) the plan is unsound and/or legally non-compliant and that it is not possible to make it so through main modifications, which would lead to an authority being invited to withdraw the plan before a recommendation to that effect was made.

Overview and Scrutiny Engagement

32. In September 2022, an update was provided to the Environment Select Committee on the Wiltshire Local Plan Review ahead of the publication of an updated Local Development Scheme in December 2022. At that meeting an overview of the process and the tests that the Plan would go through at the EiP stage of the process was provided.

33. Officers have met with the Climate Emergency Task Group to provide a briefing ahead of Cabinet about how the Draft Plan policies have been shaped to address climate change.

Safeguarding Implications

34. Although there are no direct safeguarding implications arising from the proposals, the local plan is a key document in determining how communities can thrive together; and therefore, has a role in the prevention of escalation into safeguarding.

Public Health Implications

35. The built and natural environment is a key environmental determinant of health and wellbeing. Therefore, planning for sustainable development to meet the employment, housing and infrastructure needs of communities helps foster their well-being. Well planned development and good place shaping supports the health and wellbeing of local communities. The design of a neighbourhood can contribute to the health and well-being of the people living there.

36. Several aspects of neighbourhood design (walkability and mixed land use) can also maximise opportunities for social engagement and active travel. Neighbourhood design can impact on our day-to-day decisions and therefore have a significant role in shaping our health behaviours and living in good quality and affordable housing is associated with numerous positive health outcomes for the general population and those from vulnerable groups. An example is through the provision of green infrastructure and infrastructure to encourage active travel (walking and cycling) which can lead to an increase in physical activity levels and improve physical and mental wellbeing. Active travel can also reduce over reliance on motorised transport, contributing to improved air quality and a reduction in road injuries. To support this a new policy 'Health and Wellbeing' has been introduced.

Procurement Implications

37. There are no direct procurement implications relating to the proposals in the report. However, the development of the Plan to date has been supported by evidence procured from suppliers. Any future procurement will be undertaken in line with corporate procedures.

Equalities Impact of the Proposal

38. The council is subject to a public sector duty introduced by the Equality Act 2010. This consultation, as all previous consultations, will be undertaken in accordance with the Council's adopted Statement of Community Involvement, which takes an inclusive approach to consultation ensuring that everyone can be involved.

39. An Equality Impact Assessment is being carried out alongside the preparation of the draft Plan and will accompany it when it is submitted to the Secretary of State for examination.

Environmental and Climate Change Considerations

40. To be legally compliant, the Plan must include policies designed to secure that the development and use of land in the area contributes to the mitigation of, and adaptation to, climate change in line with Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 (as amended).
41. Central to this is sustainable development and ensuring that the spatial strategy delivers a sustainable distribution of new growth that reduces the need to travel and promotes sustainable transport including walking and cycling. Furthermore, specific policies have been developed to require the delivery of sustainable design and construction, as well as renewable energy generation appropriate to Wiltshire. In addition, the policies and proposals in the Plan have been considered and designed in the light of the National Planning Policy Framework around matters such as: flood risk, water resource management, enhancing green and blue infrastructure, promoting biodiversity, delivering sustainable design and construction, and supporting renewable energy generation appropriate for Wiltshire. These policies contribute to the national 2050 net zero target and support delivery of the council's adopted Climate Strategy 2022.
42. Sustainability Appraisal (incorporating the provisions of Strategic Environmental Assessment) and Habitats Regulations Assessment also form an integral part of the plan making process. These help to ensure negative environmental impacts are avoided, appropriate mitigation is identified, and policies and proposals deliver development in a sustainable manner.

Workforce Implications

43. Preparation and implementation of the Wiltshire Local Plan Review has workforce implications for services across the Council, as well as the Planning service. To date services have contributed by providing specialist input into policy development and site selection processes, as well as commissioning of evidence to ensure that their interests have been taken into account and business plan outcomes reflected as far as possible. Involvement of Legal service has been integral due to the statutory nature of the process and Communications in supporting consultations.
44. Input will continue to be required from services as the plan progresses through the next stages of the process and resources will need to be aligned to ensure there is sufficient capacity. It is anticipated that this will be absorbed within the current capacity of services but will be kept under review.

Risks that may arise if the proposed decision and related work is not taken

45. The principal risks are: that progress is not made with developing up to date planning policy; and Wiltshire is placed at greater risk from unplanned development through developers continuing to exploit the current 5-year housing land supply position. The opportunity to put in place as soon as possible new policies that respond to Wiltshire's development needs over the period beyond 2026 and secure higher standards of development e.g., that better address climate change, as well as provide an up-to-date framework to guide neighbourhood plans, will potentially be lost. Critically, there is the risk of Government intervention if progress is not made on preparing an up to date Plan.
46. It is important for the Council to continue to make progress on preparing the Wiltshire Local Plan Review in line with commitment made in the recently approved

Local Development Scheme. The risk of not progressing the Plan would expose Wiltshire to speculative proposals that it is less well placed to defend or to development that does not maximise benefits for local communities.

Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

47. Whilst the Plan has been informed by evidence and taken into consideration comments received through consultation with local communities and developers, this does not mean it has been possible to reach a consensus. There are likely to remain opposing views to parts of the plan from different perspectives, which may be from the local community who do not wish to see development take place or a developer who wish to see their site brought forward. The consultation process has been designed to be inclusive and allow people to be involved and have their say, which will in due course be passed on to the Inspector appointed to examine the Plan.
48. The main purpose of the Regulation 19 consultation is to allow the opportunity for representations to be made on issues of soundness and legal compliance matters associated with of the Plan, prior to it proceeding to examination by an independent Planning Inspector. The Council's ability to respond to representations received at this stage is more limited than during the previous consultation stage and only minor modifications are possible without further consultation being undertaken that would lead to a delay.

Financial Implications

49. The financial implications of taking forward the Local Plan Review through Regulation 19 consultation stage, the examination stage and onto adoption has been planned for in the Council's Medium Term Financial Strategy. They will be met from the Spatial Planning Service revenue budget of £0.230m and the Local Plan earmarked reserve, which has a balance of £0.549m as at, 31st March 2023.
50. Adoption of the Plan will bring forward new sites for housing, thereby enabling the council to benefit from revenue associated with the delivery of new homes including contributing to the Council's council tax base and new homes bonus. The Plan will also bring forward new employment sites enabling the Council to benefit from business rates revenue.
51. Regaining the 5-year housing land supply position through an adopted Local Plan is likely to reduce the burden of costs associated with planning appeals.

Legal Implications

52. The council has a statutory duty to prepare and maintain a Local Plan for Wiltshire (referred to in legislation as development plan documents), for which the process is set out in the Planning and Compulsory Purchase Act (PCPA) 2004 (as amended) and Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The Plan has been prepared in line with Regulations and appropriate consultation has been undertaken as set out in the background in line with legislation. There is a statutory duty to ensure the plan is updated every five years. It is therefore important that progress be made with the Wiltshire Local Plan

Review as it is now over eight years since the Wiltshire Core Strategy was adopted.

53. The Plan has been prepared in accord with Section 33A of the PCPA 2004 (as amended), which requires the council to cooperate with neighbouring authorities constructively, actively and on an on-going basis to address any strategic cross boundary issues associated with the Plan, as well as other prescribed stakeholders. This engagement will be continued by the council during and beyond the Plan period.
54. At the Regulation 19 stage, the council has a duty to engage with the public and other stakeholders and must carry out consultation in accordance with the council's adopted Statement of Community Involvement and Regulations. Comments received at this stage of the process, once the Plan has been submitted for examination, will ultimately be considered by the Inspector appointed by the Secretary of State to examine the Plan.

Options Considered

55. Approval of the Plan and publishing it for formal consultation would mean significant progress on the Plan's preparation in line with expectations set out in the Local Development Scheme.
56. Having an up-to-date plan in place provides the local community and investors with certainty about where development should take place. It will have significant benefits for Wiltshire, ensuring that plan-led growth can occur and be a positive step towards improving the housing land supply position in Wiltshire.

Conclusions

57. The Wiltshire Local Plan Review has taken a considerable period of time and resource to prepare. It is based on a robust evidence base and informed by considerable engagement with the local community and other stakeholders. The Plan will form one of the most important strategies for the council and will be used to inform and guide decision making across numerous council services.
58. Having an up-to-date plan in place provides the local community and investors with certainty about where development should take place. It will have significant benefits for Wiltshire, ensuring that plan-led growth can occur, and the benefits of development maximised. It will provide the platform to lever in private and public sector funding and helps the council to meet its carbon reduction and other environmental aspirations.
59. The Local Plan Review has reached the final consultation stage, where representations are invited on soundness and legal compliance. This is known as the Regulation 19 stage. At this stage in the process the council will be publishing what it considers to be a sound plan.

Nic Thomas, Director for Planning

June 2023

Appendices:

Appendix 1: Wiltshire Local Plan Review: Pre-Submission Draft Plan, July 2023

Appendix 2: Schedule of Policies

Appendix 3: Main Settlement Documents

Background Papers