



# Wiltshire Local Plan

Regulation 22(1)(c)  
Consultation Statement

September 2024

Wiltshire Council

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# 1 Introduction

## 1.1 Purpose

- 1.1** This Consultation Statement sets out how Wiltshire Council (the Council) has undertaken its duties in preparing the Draft Wiltshire Local Plan 2020 - 2038 (Local Plan) in accordance with Regulations 18<sup>1</sup> and 19<sup>2</sup> of the Town and Country Planning (Local Planning) (England) Regulations 2012, hereafter referred to as the TCPR. This statement summarises the stages of consultation that have taken place, explaining who and how the public and stakeholders were invited to participate and make representations, outlining how the main issues raised from the Regulation 18 stages of consultation were taken into account in preparing the Local Plan whilst also presenting the main issues arising from the Regulation 19 consultation. The presentation of the main issues arising from the Regulation 19 consultation within this report, founded upon the tests of soundness and legal compliance against which the Local Plan is to be examined, is intended to assist in facilitating a transparent and efficient examination process led by the Planning Inspectorate.
- 1.2** This statement satisfies the requirements of Regulation 22 (1)(c) of the TCPR and demonstrates that consultation on the preparation of the Local Plan has been undertaken in accordance with the relevant Regulations and the adopted Statement of Community Involvement<sup>3 4</sup>. Some stages of the preparation of the Local Plan took place during the COVID-19 pandemic. Due to this the 2021 consultation was carried out in line with the Council's adopted Statement of Community Involvement and Temporary Arrangements Statement of Community Involvement<sup>5</sup>. The temporary arrangements document represented a response to guidance to Local Planning Authorities to review their Statement of Community Involvement in accordance with Government advice aimed at preventing the spread of COVID-19. The measures within the Temporary Arrangements document reflected the necessity to allow plan-making to progress while promoting effective community engagement by means which were reasonably practicable.
- 1.3** The Statement of Community Involvement documents set out how the Council will consult and involve the public and statutory consultees in planning matters. The Statement of Community Involvement has been instrumental in shaping the way in which the Local Plan has been prepared from inception through to submission. The Statement of Community Involvement will also be used to guide any subsequent consultation required through the Examination process on matters such as 'Main Modifications' to the Local Plan.

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<sup>1</sup> Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 specifies the consultation that the local planning authority must undertake before it can proceed to publish a 'publication', or 'pre-submission' version of the Local Plan

<sup>2</sup> Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012 specifies that the local planning authority must make available the proposed submission documents for a period of consultation prior to submission of the Local Plan

<sup>3</sup> [Statement of Community Involvement](#), Wiltshire Council (2020)

<sup>4</sup> Section 18 of the Planning and Compulsory Purchase Act 2004 (3) requires local planning authorities to prepare a Statement of Community Involvement

<sup>5</sup> *Statement of Community Involvement Temporary Arrangements*, Wiltshire Council (2020)

- 1.4** The consultation exercises undertaken by the Council have provided early, effective and meaningful engagement with what the TCPA and the council's Statement of Community Involvement define as 'specific' and 'general consultation' bodies. This has included the 'prescribed bodies' and neighbouring local planning authorities, as required by the general duty to cooperate.
- 1.5** The Council has prepared a separate Duty to Cooperate report. This Duty to Cooperate report sets out how the Council has proactively engaged with 'prescribed bodies' and complied with the duty to cooperate in accordance with Section 33A of the Planning and Compulsory Purchase Act 2004 (as inserted by section 110 of the Localism Act 2011).

## 1.2 Wiltshire local plan background

- 1.6** This Consultation Statement describes how the Council has undertaken community participation and stakeholder involvement in the production of the Local Plan, setting out how such efforts have shaped the Local Plan and the main issues raised by consultation / representations.
- 1.7** The Council began the review of the Wiltshire Core Strategy (recast as the Wiltshire Local Plan) with a consultation commencing in November 2017. Updating the existing Wiltshire Core Strategy (adopted January 2015), the Local Plan provides the strategic context for development up to 2038 and determine the level and location for future plan-led growth. It includes the allocation of a range of sites to meet the identified need for homes and jobs, a review of existing development management policies, and strategic guidance for the preparation of neighbourhood plans.
- 1.8** The Local Plan will replace the adopted Wiltshire Core Strategy (2015) and those saved policies from former District Local Plans <sup>6</sup>. The scope of the Local Plan excludes the needs of Gypsies and Travellers, which is being addressed through a separate Development Plan Document. Wiltshire Core Strategy Core Policy 47 Meeting the Needs of Gypsies and Travellers will therefore be considered through this separate Gypsies and Travellers Development Plan Document.
- 1.9** The Local Plan will form a central part of the development plan alongside the Wiltshire Housing Site Allocations Plan, the Chippenham Site Allocations Plan, made neighbourhood plans and the council's adopted Minerals and Waste Plans.
- 1.10** The proposed submission Local Plan and supporting documents, including the sustainability appraisal, were published in accordance with Regulation 19 of TCPA for an eight week consultation period lasting from Wednesday 27 September until Wednesday 22 November 2023. The Council consulted a range of stakeholders including specific consultation and statutory bodies, businesses and individual residents. A variety of consultation techniques were used in accordance with the Statement of Community Involvement <sup>7</sup>. Further information on the preparation of the Wiltshire Local Plan can be found within the 'Plan production timeline' section of this statement.

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<sup>6</sup> The Wiltshire Core Strategy replaced many of the 'saved' policies within the former North Wiltshire Local Plan 2011, the Kennet Local Plan 2011, the West Wiltshire District Plan First Alteration 2011 and the Salisbury Local Plan 2011, as well as some policies within the West Wiltshire Leisure and Recreation DPD. The remaining extant policies from these documents, as per the Wiltshire Core Strategy, are listed at Appendix D of the Wiltshire Core Strategy. These extant policies will be replaced as part of the Local Plan Review.

<sup>7</sup> [Statement of Community Involvement](#), Wiltshire Council (2020)

## 1.3 Structure of statement

**1.11** This statement of consultation comprises the following sections:

**1.12** Section 1 is an introduction to this statement, providing context.

**1.13** Section 2 sets out the timeline which has been followed in preparing the Local Plan, explaining and providing the narrative for each stage of its preparation, which is in accordance with the up to date Local Development Scheme <sup>8</sup>.

**1.14** Section 3 summarises the consultation process and the main issues raised during the course of the consultation carried out under Regulations 18 and 19 <sup>9</sup> and how the comments received have been considered by the Council.

**1.15** Section 3 is supported by the two Appendices providing more technical detail of how consultation was undertaken, the responses received at Regulation 18 and 19 stages and how these comments have been considered.

**1.16** Appendix 1 explains:

- who was invited to make representations and how under regulation 18 (in accordance with Regulation 22 (1)(c)(i) and (ii))
- a summary of the main issues raised by those persons under regulation 18 (in accordance with Regulation 22 (1)(c)(iii))
- how those issues have been addressed in the preparation of the Local Plan under regulation 18 (in accordance with Regulation 22 (1)(c)(iv)).

**1.17** Appendix 2 explains:

- how the Regulation 19 Local Plan consultation was undertaken and the number of representations made. This appendix also includes a summary of the key issues raised against the plan in plan order.

**1.18** Copies of all representations made in accordance with regulation 20 (comments received as part of the Regulation 19 consultation) are available to view online <sup>10</sup>.

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<sup>8</sup> [Local Development Scheme](#), Wiltshire Council (2024)

<sup>9</sup> In accordance with Regulation 22 (1)(c)(v)

<sup>10</sup> Available via the Council's [consultation portal](#)





## 2 Plan production timeline

### 2.1 Plan production timeline

**2.1** This section of the report sets out the timeline that has been followed in preparing the Local Plan. Table 2.1 outlines the main stages of consultation in the preparation of the Local Plan up until the date of submission.

**Table 2.1 Local Plan production timeline up until the date of submission**

Consultation	Date
Issues and opportunities consultation	7 November to 19 December 2017 (in accordance with Regulation 18 of the TCPR)
Informal consultation	Autumn 2018
Informal consultation	Autumn 2019
Wiltshire Local Plan Review consultation	13 January to 9 March 2021 (in accordance with Regulation 18 of the TCPR)
Pre-Submission Wiltshire Local Plan Regulation 19 consultation	27 September to 22 November 2023 (in accordance with Regulation 19 of the TCPR)

**2.2** Further information about these stages of consultation is provided below. Information has also been provided, as part of the commentary on the plan production timeline, on other key developments and milestones that have taken place during the preparation of the Local Plan to assist in illustrating the work undertaken during the Local Plan's preparation. This also introduces some context on how the findings from various stages of consultation have informed the preparation of the Local Plan.

#### 2.1.1 Issues and opportunities consultation 2017

##### Overview

**2.3** Following approval by [Wiltshire Council's Cabinet on 10 October 2017](#) a consultation on the scope and content of the review of the Wiltshire Core Strategy (recast Wiltshire Local Plan) was held between 7 November and 19 December 2017 in accordance with Regulation 18 ('preparation of a local plan') of the TCPR. The consultation sought views on the scope of the review, including the preparation of a Joint Spatial Framework to consider how development across the Borough of Swindon and the Wiltshire Council area should take place. The Wiltshire Local Plan Review 'Scope of the Plan' consultation was the first stage of the Wiltshire Local Plan review.

**2.4** The Regulation 18 consultation, in providing an opportunity to start to engage with the community and other interested parties about the development of a Joint Spatial Framework with Swindon Borough Council, ran concurrently with that for the Swindon Local Plan Review. This followed a report to Wiltshire Council's Cabinet on 12 September 2017 which, when introducing an updated Local Development Scheme, set out the intention to pursue separate but aligned local plans alongside a joint non-statutory framework.

**2.5** The Local Development Scheme of September 2017 set out the purpose of the Local Plan review to be:

*“The purpose of the review of the adopted Local Plan will be to assess the future levels of need for new homes (including market, affordable and specialist housing and Gypsy and Traveller accommodation) and employment land over the period 2016-2036 and to provide an appropriate basis for housing, employment land and infrastructure provision over that period.*

*It will involve considering if the existing adopted development strategy remains relevant, identifying new site allocations relating to housing and employment together with supporting services and infrastructure.*

*The review will also include:*

- *Some updating of existing Wiltshire Core Strategy development management policies to ensure their continued consistency with national policy;*
- *the introduction of additional development management policies in response to the review of the saved development management policies not replaced by the Wiltshire Core Strategy; and*
- *developing additional locally distinctive policies to plan positively for all town centres in Wiltshire consistent with national policy.*

*It will not be the purpose of the review to change or remove strategic objectives or policies that remain in accordance with national policy and support the delivery of sustainable development.”*

**2.6** A summary of this consultation is provided below. Separate reports <sup>1112 13</sup> provide greater detail of the procedure and findings from the consultation that took place.

**2.7** In summary, the intention was that the consultation would:

- Seek comments on the proposed scope of the Local Plan review;
- Invite comments on the proposed objectives and approach to developing the Joint Spatial Framework;
- Invite comments on the strategic issues / constraints and possible opportunities at each main settlement;
- Invite the submission of sites for consideration through a call for sites (this would only apply to additional sites not previously considered through the Swindon Borough SHELAA and Wiltshire SHLA);
- Raise awareness of the completed SHMA/FEMAA; and
- Ask consultation questions to obtain opinions on broad spatial options.

**2.8** Both authorities also undertook consultation on their respective Sustainability Appraisal scoping reports as part of their Regulation 18 consultations.

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<sup>11</sup> [Wiltshire Local Plan Review Scope of the Plan \(Regulation 18 consultation\) Report of the Consultation Process](#), Wiltshire Council (February 2019); ([Appendices](#))

<sup>12</sup> [Wiltshire Local Plan Review Scope of the Plan \(Regulation 18 consultation\) Report of Parish Briefings](#), Wiltshire Council (February 2019)

<sup>13</sup> [Wiltshire Local Plan Review, Swindon Borough Local Plan Review, Scope of the Plan \(Regulation 18 consultation\) Report of Developer Forum](#), Wiltshire Council (February 2019)

## Consultation material

- 2.9** The consultation invited comments on two main documents, the ‘Wiltshire Local Plan Review: Consultation Paper’<sup>14</sup> and the ‘Swindon and Wiltshire Joint Spatial Framework Issues Paper’<sup>15</sup> with the intention of raising awareness of this work and to seek views on the approach.
- 2.10** The ‘Wiltshire Local Plan Review: Consultation Paper’ set out the proposed scope of the Wiltshire Local Plan Review, explaining that the new homes, employment land and associated infrastructure needs required over the plan period were to be addressed in the review. It also considered where an update of existing Wiltshire Core Strategy development management policies may be needed to ensure their continued consistency with national policy; how to consolidate older ‘saved’ policies from former Wiltshire district council local plans; and bespoke policies to plan positively for each town centre in Wiltshire. This consultation paper set out 3 specific questions to facilitate feedback covering the scope of the review, the policy assessment to date and any policy topics not considered.
- 2.11** The ‘Swindon and Wiltshire Joint Spatial Framework Issues Paper’ invited views on the issues and opportunities within Swindon Borough and Wiltshire to help shape future growth in the area and inform the proposed Joint Spatial Framework. The intention being the Joint Spatial Framework would guide the overall strategy and distribution of development across the wider area of the two Councils, providing evidence to inform each Councils’ individual local plan review which would contain detail on matters such as site allocations. Questions were invited on the scope and objectives of the Joint Spatial Framework alongside the Strategic Housing Market Assessment and Functional Economic Market Area Assessment.
- 2.12** The consultation on the Joint Spatial Framework Issues Paper was supported by four Housing Market Area profiles <sup>16 171819</sup>. These profiles highlighted the strategic issues facing each of the county’s principal settlements and market towns, identifying information including strategic issues, opportunities and constraints at both a settlement and housing market area level and invited answers to questions on these topics.
- 2.13** The consultation documents were prepared to stimulate discussion on how the review of the Wiltshire Local Plan should be carried out.
- 2.14** The Council also invited representations on a draft Sustainability Appraisal Scoping Report. This proposed a Sustainability Appraisal Framework, including objectives and decision aiding questions, to be used in the assessment of draft policies and proposals as part of the plan making process.

### 2.1.2 Informal consultation and key milestones 2018 - 2020

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<sup>14</sup> [Wiltshire Local Plan Review Consultation Paper](#), Wiltshire Council (November 2017)

<sup>15</sup> [Swindon and Wiltshire Joint Spatial Framework Issues Paper](#), Wiltshire Council (November 2017)

<sup>16</sup> [Chippenham Housing Market Area – Individual Settlement and Housing Market Area Profile](#), Wiltshire Council (November 2017)

<sup>17</sup> [Salisbury Housing Market Area – Individual Settlement and Housing Market Area Profile](#), Wiltshire Council (November 2017)

<sup>18</sup> [Swindon Housing Market Area – Individual Settlement and Housing Market Area Profile](#), Wiltshire Council (November 2017)

<sup>19</sup> [Trowbridge Housing Market Area – Individual Settlement and Housing Market Area Profile](#), Wiltshire Council (November 2017)

## Informal consultation 2018

- 2.15** Following the Issues and Options consultation in autumn 2017, a number of Parish and Town council events were held in autumn 2018 to help develop our thinking further on planning for new homes to 2036. These aimed to further develop the discussion from the 2017 consultation in relation to the scale, location, and direction of growth, in both the urban and rural communities that make up Wiltshire. Specifically, the events helped to address the following questions:
1. how can approximately 44,000 homes be distributed across Wiltshire, with a focus on Wiltshire's market towns and principal settlements, to maintain the role and function of those places and promote sustainable development?
  2. how can policies within the Local Plan support proportionate housing growth outside named market towns and principal settlements (the rural area) and support the role of neighbourhood plans?
- 2.16** Representatives of town and parish councils and neighbourhood plan steering groups were invited to attend along with elected Wiltshire Councillors. The output from this consultation informed the emerging strategy options as reported to [Cabinet on 30 April 2019](#).
- 2.17** A report <sup>20</sup> on the events was produced outlining the material prepared for these events, the exercises undertaken and the outcomes arising from the feedback received.

## Local Plan pause

- 2.18** The Regulation 18 consultation in 2017 was in accordance with the timeline as set out within the Wiltshire Local Development Scheme September 2017. This timetable, as reported to [Cabinet on 12 September 2017](#), recognised that a consultation on proposed changes to the then National Planning Policy Framework (NPPF) 2012 were anticipated early in 2018. It was recognised that changes to the NPPF may have consequences for the programme for the review of the local plan.
- 2.19** Having announced its intention to revise national policy in a housing white paper in September 2017, between 5 March and 10 May 2018 the Government consulted on a draft revised NPPF and Planning Practice Guidance (PPG). The final version of a revised NPPF was published on 24 July 2018 and subsequently more minor amendments were published in a further revision in February 2019.
- 2.20** Work on the local plan review was paused to enable officers to reflect on the implications of the new national policy for plan making. In relation to plan making and housing delivery, three significant changes were introduced particularly pertinent to the local plan review, namely:
- A standard methodology for calculating minimum local housing need based on household growth projections and local affordability ratios (house price to income);
  - Local housing need is to be expressed as a single authority housing figure replacing the previous approach to calculate local housing need on the basis of housing market areas; and
  - A raised profile on Statements of Common Ground with neighbouring local planning authorities that agree approaches to strategic cross boundary issues and for these to be updated as preparation progresses.

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<sup>20</sup> [Scale and Distribution of Growth, Report of Informal Consultation with Town and Parish Councils](#), Wiltshire Council (2019); [Scale and Distribution of Growth, Report of Informal Consultation with Town and Parish Councils Appendices](#), Wiltshire Council (2019)

## Cabinet 26 March 2019

- 2.21** As reported to [Cabinet on 26 March 2019](#), the result of the standard method, the starting point for plan making and representing the minimum number of homes needed in the local authority area, was that around 40,500 homes would be the minimum local housing need for Wiltshire for the period 2016 to 2036. This notwithstanding the need to have regard to the Strategic Housing Market Assessment and to consider whether actual housing need may be higher considering factors such as economic circumstances, strategic infrastructure need or where there may be unmet need from a neighbouring authority. It was also reported that the local housing need figure should be kept under review and revised where appropriate<sup>21</sup> and that allowing contingency within the local plan housing requirement would help to safeguard against revised housing need calculations being higher than anticipated when the plan is submitted for examination.
- 2.22** It was also reported, in balancing the need to establish housing requirements for Wiltshire authority area<sup>22</sup> alongside the requirement that housing should come forward where it is needed<sup>23</sup>, that the Local Plan continues to distribute housing need within the County on the basis of Housing Market Areas to enable the need that derives from within a specific Housing Market Area to be met within the same area to which it relates. The Strategic Housing Market Assessment identified four Housing Market Areas, the geography of which were reviewed in response to comments received during consultation with these changes agreed as part of the Cabinet meeting as a basis for housing distribution within Wiltshire, informing the development of a preferred strategy for the Local Plan.
- 2.23** There was also a raised profile for Statements of Common Ground in the revised NPPF in terms of how Councils are expected to fulfil the statutory duty to co-operate. Following standard methodology work at the time, it was understood that there would be a sufficient supply of dwellings in Swindon to meet its housing need without recourse to seek allocations within adjacent authorities. As part of ongoing engagement between Wiltshire Council and Swindon Borough Council, reflecting the NPPF requiring local authorities to maintain statements of common ground documenting cross-boundary matters, it was identified that such a document would cover many of the elements previously intended to be included within the Swindon and Wiltshire Joint Spatial Framework. This marked the moment at which it was endorsed that a statement of common ground would now cover matters in relation to housing and employment requirements, cross boundary strategic matters and the scope of any joint working with Swindon Borough Council.
- 2.24** Accounting for these circumstances, changes to the Local Development Scheme were proposed to revise the timetable for the Local Plan Review which incorporated a Statement of Common Ground with Swindon Borough Council rather than a timeline for a Joint Spatial Framework. The scope of the plan remained unchanged.

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<sup>21</sup> It was reported that the output from the standard method may change when new household projections and affordability ratios are published, potentially every 2 years. Similarly that the Government had indicated that a revised methodology would be published by 2020. Given the local housing need calculated using the standard method could be relied upon for a period of 2 years from the time a plan is submitted to the Planning Inspectorate for examination, it was highlighted that any changes to the local housing need calculation using the standard method, prior to submission to the Secretary of State, would need to be taken into account before the plan is submitted.

<sup>22</sup> The NPPF required that “Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period” (Paragraph 65)

<sup>23</sup> The NPPF also required that land for housing should come forward where it is needed (paragraph 59) but no longer specifically referenced housing market areas

## Cabinet 30 April 2019

- 2.25** Bringing together the outcomes of the consultations in 2017 and 2018, alongside the revisions to national policy and guidance, the report to [cabinet on 30 April 2019](#) set out the next steps for the review of the Wiltshire Local Plan relating to the development strategy and identified a range of housing growth for Wiltshire (2016 to 2036) to be tested. The outcome included endorsing the approach to test a housing range of between 40,840 (standard method) and 45,600 (2019 Strategic Housing Market Assessment review) homes as the basis to test and inform an appropriate local plan housing requirement for Wiltshire (2016 to 2036). This reflecting the need to keep the level of local housing need under review as new data becomes available and adopt a flexible approach to calculating the plan's housing requirement given the anticipation for the potential for change. Similarly it identified alternative development strategies for different distributions of employment and housing growth by housing market area to be considered through the plan making process to develop a preferred strategy, building on the previously agreed Housing Market Areas as a basis for housing distribution.
- 2.26** At this stage it was clarified that the range of homes being tested was not the local plan housing requirement. Instead subsequent stages of plan making would need to test alternative strategies to accommodate these needs and consider: deliverability, the need for flexibility, choice and contingency, as well as land availability, environmental constraints and infrastructure requirements. In the first instance, testing the deliverability of the higher number in the range to provide contingency to respond to potential changes to the minimum local housing need was undertaken. In terms of employment land, the Swindon and Wiltshire Functional Economic Market Area Assessment (FEMAA) supported by the Wiltshire Employment Land Review 2017 formed the basis for disaggregating the need for employment land in the county Informal consultation 2019.
- 2.27** It was agreed the next steps would be to undertake further assessment of the alternative development strategies and to undertake further informal consultation with town and parish councils and representatives of neighbourhood plan groups to discuss in more detail site options. This engagement would also include hosting a developer forum to discuss site availability, delivery and viability issues alongside discussing the alternative development strategies.

## Informal consultation 2019

- 2.28** During 2019 a series of workshops were held with Town and Parish Councils, alongside a Developers Forum, to provide updates on the Local Plan Review process. The focus for these sessions was largely centred on how the overall housing numbers could be distributed across Wiltshire in line with the Settlement Strategy set out in the adopted Wiltshire Core Strategy. In addition, the Developer Forum looked at issues focused on development viability and understanding market signals.
- 2.29** For the town and parish meetings (including neighbourhood planning groups), these were held on a town basis with the purpose of presenting the Alternative Development Strategies to the towns and parishes within Wiltshire and discuss strategic priorities for each settlement. The aim was to uncover the priorities for the towns and how best to distribute housing and employment presented in the Alternative Development Strategies moving forward with the Local Plan Review. A meeting was also held to explore opportunities and issues associated with a new settlement in the south of Wiltshire, this meeting involving those town and parish councils being within or near an 'area of search'.

- 2.30** Representatives of rural parish councils (and neighbourhood planning groups) also met to develop ideas for rural policies to support the resilience of Wiltshire's rural communities, including their role in providing for new homes, alongside discussing the complementary roles of the Local Plan and Neighbourhood Plans.
- 2.31** The outcome of these informal consultations is contained within a series of reports<sup>24 25 26</sup>, these reports outlining the material prepared for the events, exercises undertaken and the outcomes arising from the feedback received.

## 2020 updated scope and additional consultation

- 2.32** Following informal consultation and further work having been undertaken to progress the evidence base, amendments to the local plan timeline were proposed and reported to [Cabinet on 24 March 2020](#). These amendments were proposed to allow for additional consultation with the wider community on proposals for growth to build on the emerging evidence base and targeted consultation undertaken more recently. The revised timetable also allowed for greater emphasis to be placed on climate change in the light of the Council's declaration on this matter. A later submission date was also anticipated to enable the revision to Government's national policy on Local Housing Need to be fully considered before the draft Plan be completed for its final stage of consultation. Flexibility was embedded within the timeline for an additional stage of consultation taking into account the potential for COVID-19 disruption.
- 2.33** In addition, revisions to the Local Development Scheme made provision to amend the scope of the Local Plan Review and progress a separate single issue plan that meets the needs of Gypsies and Travellers. This represented a change to the scope of the Local Plan and reflected the updated Gypsy and Traveller Accommodation Assessment to monitor provision of this accommodation.
- 2.34** The amended scope of the Wiltshire Local Plan Review was as follows:

*The purpose of the review of the adopted Local Plan will be to assess the future levels of need for new homes (including market, affordable and specialist housing) and employment land over the period 2016-2036 and to provide an appropriate basis for housing, employment land and infrastructure provision over that period.*

*It will involve considering if the existing adopted development strategy remains relevant, identifying new site allocations relating to housing and employment together with supporting services and infrastructure.*

*It will not be the purpose of the review to change or remove strategic objectives or policies that remain in accordance with national policy and support the delivery of sustainable development.*

*The review will also include:*

- *targeted updating of existing Wiltshire Core Strategy development management policies to ensure their continued consistency with national policy;*

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<sup>24</sup> [Scale and Distribution of Growth: Strategic Priorities, Report of Informal Consultation with Town and Parish Councils](#), Wiltshire Council (2019); [\(Appendices\)](#)

<sup>25</sup> [Planning Positively in Rural Areas, Report of Informal Consultation with Town and Parish Councils](#), Wiltshire Council (2019); [\(Appendices\)](#)

<sup>26</sup> [Scope of the Plan: Delivery and Viability, Report of the Developer Forum 23rd July Held at The Civic Centre, Trowbridge](#), Wiltshire Council (2019)

- *the introduction of further detailed development management policies as part of a review of the saved development management policies not replaced by the Wiltshire Core Strategy; and*
- *developing additional locally distinctive policies to plan positively for all town centres in Wiltshire consistent with national policy.*

### 2.1.3 Local Plan Review consultation 2021

#### Context

- 2.35** Following updating the Local Plan timetable as reported to [Cabinet on 24 March 2020](#), and the flexibility reported at that time to undertake consultation allowing for COVID-19 disruption, Cabinet ([01 December 2020](#)) was informed of the intention to undertake this further round of consultation at the beginning of 2021. This consultation was aimed at enabling the community and stakeholders to inform and comment upon how the Local Plan might deliver the required level of growth across Wiltshire. By undertaking consultation prior to any allocations being made in a draft Local Plan, the intention was for people to have the opportunity to put forward their views and inform the Council's thinking in this regard. These views then informing the details of the draft Plan.
- 2.36** Following prior consideration of a housing range (40,860 to 45,600) and the assessment of alternative development strategies for distributing growth, taking into consideration the identification of Housing Market Areas as a basis to distribute growth, an Emerging Spatial Strategy had emerged that distributed the upper end of this range around the county<sup>27</sup>. This was reported within the Emerging Spatial Strategy paper and considered evidence available at the time, including Sustainability Appraisal and public consultation findings. The strategy also identified the proposed overall level of new homes and employment land for each main settlement and rural part of the HMA, over the plan period, together with what remained to be planned for. The strategy also included brownfield land targets reflecting one of the delivery principles of the strategy, this also forming the basis of the neighbourhood plan housing requirement for larger settlements.
- 2.37** The consultation therefore aimed to receive feedback on the possible options for growth at each place alongside consulting on the planning framework for rural areas. Comment was invited on whether changes to rates of growth were too high, what obstacles stood in the way, or too low, and what the opportunities were. A range of potential development sites available at the time (preferred sites at Principal Settlements), narrowed down to a set of reasonable alternatives, were also presented to ensure the community could view these and inform the next steps of plan making prior to selecting sites for development. Following prior consultation, 'place shaping priorities' at each main settlement were also presented to understand how well these represented the community's vision and needs. Settlement profiles on important services and infrastructure to be taken into consideration in planning for each place, alongside information on the local economy and housing needs, were also made available.
- 2.38** For rural communities a background paper set out how housing might be provided at Large Villages and Local Service Centres, building on discussions that took place previously with Town and Parish Councils. Similarly a Climate Change paper examined the role the Local Plan Review can play in helping to achieve carbon neutrality by 2030, acknowledging the Council's declaration of a climate emergency.

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<sup>27</sup> as identified in the [Swindon and Wiltshire Local Housing Need Assessment \(LHNA\)](#), Opinion Research Services (April 2019), for the period 2016 to 2036



**2.39** As part of the ongoing work on evidence base studies that informed the development of policies in the Local Plan, where complete, these evidence base documents were made available for comment during the consultation.

### Public consultation (Regulation 18)

**2.40** Public consultation was undertaken on the Wiltshire Local Plan review under Regulation 18 of the TCPR between 13 January and 9 March 2021. As described, the consultation was not on a draft Local Plan but on key components to inform one, including proposals for the scale and distribution of housing and employment growth across Wiltshire, based on a plan period of 2016-2036.

**2.41** A summary of the content consulted upon can be viewed within Table 2.2.

**Table 2.2 List of documents consulted upon through the Local Plan Review consultation that took place between 13 January and 9 March 2021**

Document(s)	Further information
<b>Emerging Spatial Strategy</b>	Contained information relating to the proposed distribution of growth around the county. This was expressed in terms of the amount of new homes and land for employment that each main settlement should accommodate.
<b>Empowering Rural Communities</b>	Set out information including: <ul style="list-style-type: none"> <li>• Framework to support neighbourhood planning and to address local housing needs through an amended Core Policy 44</li> <li>• Housing requirements for each Local Service Centre and Large Village to help guide neighbourhood plans.</li> </ul>
<b>Addressing Climate Change and Biodiversity Net Gain</b>	Set out information including: <ul style="list-style-type: none"> <li>• Five linked key policy themes, in addition to the Spatial Strategy, aiming to help support the Plan's objective in respect of adapting to and mitigating climate change.</li> <li>• Set out our approach on these key themes, asking people to help develop what we already know about the social, economic and environmental challenges facing Wiltshire in terms of a changing climate.</li> </ul>
<b>Planning for (Market Town)</b>  <i>Document produced for each Market Town, namely:</i>  <i>Amesbury, Bradford on Avon, Calne, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Royal Wootton Bassett, Tidworth and Ludgershall, Warminster and, Westbury</i>	This suite of twelve documents set out information for each market town, including: <ul style="list-style-type: none"> <li>• Proposed scale of growth (additional new homes and employment land, 2016 to 2036)</li> <li>• Place shaping priorities to guide development (these play a central role in developing planning policies and proposals for development at each place)</li> <li>• Potential development sites</li> <li>• Settlement profiles on important services and infrastructure that will need to be taken into consideration when planning for the future of the town.</li> </ul>
<b>(Market Town) Site Selection report</b>  <i>Document produced for each Market Town, namely:</i>	This suite of twelve documents set out information for each market town, including: <ul style="list-style-type: none"> <li>• The justification for how the set of potential development sites was arrived at.</li> </ul>

Document(s)	Further information
<p><i>Amesbury, Bradford on Avon, Calne, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Royal Wootton</i></p> <p><i>Bassett, Tidworth and Ludgershall, Warminster and, Westbury</i></p>	
<p><b>Planning for (Principal Settlement)</b></p> <p><i>Document produced for each Principal Settlement, namely: Chippenham, Salisbury and, Trowbridge</i></p>	<p>This suite of three documents set out information for each principal settlement, including:</p> <ul style="list-style-type: none"> <li>• Proposed scale of growth (additional new homes and employment land, 2016 to 2036)</li> <li>• Place shaping priorities to guide development (these play a central role in developing planning policies and proposals for development at each place)</li> <li>• Preferred development site</li> <li>• Concept plans for each preferred site (illustrating a way the land identified can be developed)</li> <li>• Settlement profiles on important services and infrastructure that will need to be taken into consideration when planning for the future of the town.</li> </ul>
<p><b>(Principal Settlement) Site Selection report</b></p> <p><i>Document produced for each Principal Settlement, namely: Chippenham, Salisbury and, Trowbridge</i></p>	<p>This suite of three documents set out information for each principal settlement, including:</p> <ul style="list-style-type: none"> <li>• The justification for how the set of preferred development sites was arrived at</li> </ul>
<p><b>Supporting documents</b></p> <p><i>Several supporting documents were prepared informing the proposals, these are listed opposite.</i></p>	<p>Local Plan Review Interim Sustainability Appraisal</p> <ul style="list-style-type: none"> <li>• Documents included Non-Technical Summary, Interim Sustainability Appraisal (incorporating Strategic Environmental Assessment), Annex I (Assessment of Alternative Development Strategies for the four Housing Market Areas and Annex II (Principal Settlements: Site Assessments)</li> </ul> <p>Habitats Regulations Assessment Screening Opinion</p> <ul style="list-style-type: none"> <li>• Single document: Wiltshire Local Plan Review Habitats Regulations Assessment Scoping Report</li> </ul>

Document(s)	Further information
	<p>Local Transport Review</p> <ul style="list-style-type: none"> <li>• Single document: Wiltshire Local Plan Transport Review</li> </ul> <p>Formulating Alternative Development Strategies</p> <ul style="list-style-type: none"> <li>• Documents included: Chippenham Housing Market Area (Formulating Alternative Development Strategies), Salisbury Housing Market Area (Formulating Alternative Development Strategies), Swindon Housing Market Area (Formulating Alternative Development Strategies), Trowbridge Housing Market Area (Formulating Alternative Development Strategies)</li> </ul> <p>Retail and Town Centre documents</p> <ul style="list-style-type: none"> <li>• Documents included: Wiltshire Retail and Town Centre Study 2020 Volume 1 (main text), Wiltshire Retail and Town Centre Study 2020 Volume 2 (appendices), Wiltshire Core Strategy retail review 2015 plus appendices 1 - 37.</li> </ul> <p>Local Housing Needs Assessment</p> <ul style="list-style-type: none"> <li>• Single document: Swindon Borough Council &amp; Wiltshire Council Local Housing Needs Assessment 2019</li> </ul> <p>Employment Land Review</p> <ul style="list-style-type: none"> <li>• Single document: Employment Land Review 2018 plus appendices 1 – 8.</li> </ul> <p>Functional Economic Market Assessment</p> <ul style="list-style-type: none"> <li>• Single document: Swindon and Wiltshire Functional Economic Market Assessment 2016 plus appendices 1 – 8.</li> </ul> <p>Level 1 Strategic Flood Risk Assessment</p> <ul style="list-style-type: none"> <li>• Single document: Wiltshire Council Level 1 Strategic Flood Risk Assessment</li> </ul> <p>Informal consultation reports (Autumn 2019)</p> <ul style="list-style-type: none"> <li>• Five documents detailing the process and outcome of this consultation.</li> </ul> <p>Informal consultation reports (Autumn 2018)</p> <ul style="list-style-type: none"> <li>• Two documents detailing the process and outcome of this consultation.</li> </ul> <p>Regulation 18 Issues and Options consultation statements (Autumn 2017)</p> <ul style="list-style-type: none"> <li>• Four documents detailing the process and outcome of this consultation.</li> </ul>
<p>Note: All documents can be found via the <a href="#">Local Plan Review consultation 2021 web page.</a></p>	

**2.42** Overall, more than 3,500 representations were made from circa 2,680 people and organisations. A detailed summary of this consultation, including the process followed and outcomes arising, can be found in a separate report <sup>28</sup>.

## Preparing for Regulation 19

- 2.43** As reported to [Cabinet on 29 June 2021](#), in reporting some of the main issues raised, it was highlighted that collectively the responses received as part of the 2021 Regulation 18 consultation represented a wide range of views that reinforced the need to further develop evidence on housing and employment growth alongside how best to tackle climate change. The consultation highlighted the difficult decisions required when planning for growth, such as the provision of affordable housing and land for business. It was clear that, whilst Wiltshire was identified as a location for development potential, local communities were equally cautious about further growth. The level of growth represented a topic for a divergence of views with regards the appropriate level of growth to plan for. Concerns centred around environmental issues, the ability for infrastructure to cope (particularly health, education and transportation) and the view that while significant housing has taken place this has not been matched with new jobs in the past. Understanding such issues and concerns were identified as an important part of the work moving forward.
- 2.44** Whilst recognising the clear concerns of the local community it was also highlighted that the Local Plan must be prepared on the basis of objective assessments of needs for housing and employment and a comprehensive appraisal of the evidence. Overall, the consultation led to a need to undertake further technical evidence on a range of issues such as updated evidence on growth forecasts to accurately inform the content of the draft Local Plan, looking again at the range of housing need to ensure it is evidence based and an appropriate deliverable housing requirement for Wiltshire. This included the need to review the minimum standard methodology figure to consider new affordability data; updating the employment projections to inform the jobs / workers balance and understand the economic implications of COVID-19 and Brexit. It was recognised that a review of the evidence may lead to changes at housing market area level and the allocations within them.
- 2.45** Similarly the consultation indicated a need to review the evidence on employment need, the need to consider how best to regenerate town centres alongside the need for further evidence and consideration to better understand infrastructure requirements for each place. Further work would also be undertaken to understand how best to plan for rural settlements and the future direction on renewable energy, off-grid energy and zero carbon development.
- 2.46** Acknowledging the time required to undertake further work as reported to Cabinet in June 2021 to review key parts of the evidence base, an updated timetable for the progress of the Local Plan was included within the Local Development Scheme as published in November 2021. Following this, and in reflection of the ongoing work being undertaken on housing need and employment evidence, it was reported to [Cabinet in December 2022](#) that further revisions to the Local Plan timeline were necessary alongside the need to update the plan period to 2038. The extension of the Local Plan horizon to look ahead to 2038 was reflected in the revised Local Development Scheme in December 2022, including the scope of the Local Plan. Aligned to this was an update to the base date of the Local Plan from 2016 to 2020.

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<sup>28</sup> [Wiltshire Local Plan Review Consultation January - March 2021. Consultation report and next steps](#). Wiltshire Council

## 2.1.4 Pre-Submission Wiltshire Local Plan Regulation 19 consultation

### Context

- 2.47** Having been informed by evidence, several stages of engagement and having responded to changes in national planning policy, the completion of A Pre-Submission Draft Plan had occurred by the summer of 2023.
- 2.48** Planning for 36,740 homes and around 160ha hectares of employment land over 18 years, it plans for a reduced amount of growth when compared to the 45,630 homes consulted on in 2021, the revised figure representing the amount required by the Government's standard methodology. The overall growth being distributed to Wiltshire's four housing market areas using up to date population data, ensuring that the new homes are provided where they are needed. The number of homes for each area having 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. The updated evidence work undertaken on housing need and its broad distribution to housing market areas 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 was revised to take into consideration the changes in the broad distribution of growth, the consultation responses and evidence about the ability of settlements to accommodate further development including their environmental constraints. Generally, this meant the same broad distribution and relationships between settlements established in the emerging spatial strategy for three of the areas. The Revised Spatial Strategy<sup>29</sup> evidence paper, documenting these findings, formed part of the Regulation 19 consultation.
- 2.49** For the Salisbury area it was necessary to test new alternative development strategies through sustainability appraisal. This reflecting the 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. This testing led to a revised spatial strategy for the Salisbury area that included 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.
- 2.50** Reflecting the constraint that the pollution of the River Avon (Hampshire) Special Area of Conservation represents, in addition to evidence on land availability, a stepped housing requirement for Wiltshire as a whole is proposed. This allowing for a slower rate of development in the early part of the plan period, reflecting the time needed 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 Special Area of Conservation. The Housing Delivery Paper, forming part of the Regulation 19 consultation, provided more detail on how the Local Plan makes provision for a sufficient rate and scale of housing development.
- 2.51** The Local Plan also contains a suite of reviewed policies intended to inform planning decisions whilst also containing new policies to support Wiltshire in, for instance, 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.

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<sup>29</sup> [Revised Spatial Strategy](#), Wiltshire Council (September 2023)

- 2.52** In line with the proposed scope of the Local Plan review, 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.

## Regulation 19 consultation

- 2.53** Wiltshire Council published the draft Wiltshire Local Plan, along with accompanying evidence reports, for formal consultation in accordance with Regulation 19 of the TCPA over an 8 week consultation period running from Wednesday 27 September to Wednesday 22 November 2023. The consultation represented an opportunity for all interested parties to have their say on the proposals.
- 2.54** Further information about how this consultation was undertaken can be found within Appendix 2 of this report. A summary of the main issues raised as part of this consultation, in accordance with Regulation 22 (1)(c)(v) of the TCPA, and how the comments received have been considered by the Council can be found within Section 3 of this report.





## 3 Summary of the main issues

### 3.1 Summary of consultation process

#### Regulation 18

- 3.1** Public consultation under Regulation 18 of the TCPR took place in two stages. In 2017 an initial consultation involved documents being prepared to stimulate discussion on how the review of the Wiltshire Local Plan should be carried out. A report <sup>30</sup> was prepared on this issues and options consultation that sets out a summary of the actions taken to raise awareness of the consultation and summarises the consultation responses and the main issues raised. Further information summarising this Regulation 18 consultation, extracting some key elements from the report in accordance with Regulation 22 (1)(c)(i) to (iv)) <sup>31</sup>, can be found within Appendix 1 of this report.
- 3.2** As part of the awareness raising process for this 2017 consultation, informal consultation events were held and reports of these parish briefings<sup>32</sup> and developer forum<sup>33</sup> were also prepared.
- 3.3** In 2021, following further informal rounds of consultation building on the findings from 2017 and further evidence gathering, a further round of consultation was held under Regulation 18 of the TCPR on the key components to inform the preparation of the Local Plan. A separate report <sup>34</sup> was prepared for this consultation that sets out a summary of the actions taken to raise awareness of the consultation and summarises the consultation responses and the main issues raised. Further information summarising this Regulation 18 consultation, extracting some key elements from the report in accordance with Regulation 22 (1)(c)(i) to (iv))<sup>35</sup>, can be found within Appendix 1 of this report.

#### Regulation 19

- 3.4** In July 2023, Wiltshire Council's Cabinet<sup>36</sup> and Full Council<sup>37</sup> approved that the draft Local Plan may proceed to Regulation 19 pre-submission consultation. The proposed submission Regulation 19 version of the Local Plan and supporting documents, including the sustainability appraisal, were published in accordance with Regulation 19 of the TCPR for an 8 week consultation period from Wednesday 27 September 2023 to Wednesday 22 November 2023.

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<sup>30</sup> [Wiltshire Local Plan Review Scope of the Plan \(Regulation 18 consultation\) Report of the Consultation Process](#), Wiltshire Council (February 2019); [\(Appendices\)](#)

<sup>31</sup> Regulation 22 (1)(c)(i) to (iv) outlines the need to set out which bodies and persons the local planning authority invited to make representations; how they were invited to make representations; a summary of the main issues raised by the Regulation 18 representations and how those representations have been taken into account

<sup>32</sup> [Wiltshire Local Plan Review Scope of the Plan \(Regulation 18 consultation\) Report of Parish Briefings](#), Wiltshire Council (February 2019)

<sup>33</sup> [Wiltshire Local Plan Review, Swindon Borough Local Plan Review, Scope of the Plan \(Regulation 18 consultation\) Report of Developer Forum](#), Wiltshire Council (February 2019)

<sup>34</sup> [Wiltshire Local Plan Review Consultation January - March 2021, Consultation report and next steps](#), Wiltshire Council

<sup>35</sup> Regulation 22 (1)(c)(i) to (iv) outlines the need to set out which bodies and persons the local planning authority invited to make representations; how they were invited to make representations; a summary of the main issues raised by the Regulation 18 representations and how those representations have been taken into account

<sup>36</sup> [Tuesday 11 July 2023](#)

<sup>37</sup> [Tuesday 18 July 2023](#)

**3.5** Appendix 2 provides details of how the requirements of Regulation 22(1)(c)(v)<sup>38</sup> have been met, detailing how this consultation was carried out, who was consulted alongside statistics regarding the number of representations made pursuant to regulation 20. Appendix 2 also presents, at Schedule 2, a summary of key issues raised in those representations, this being intended to provide a more comprehensive list of the issues consultee's have raised against each part of the plan, more comprehensive than the refined list of main issues within the body of this report. A summary of the main issues raised at Regulation 19/20 is provided in the following section of this report.

## **3.2 Main issues raised pursuant to Regulations 19/20**

**3.6** A total of 10,743 comments were received in response to the Regulation 19 consultation. Two petitions were also received, one of 1386 signatures (Land North of Downton Road, comment number 2058) and another that received 1067 hand written signatures and 1063 electronic signatures (Former golf course reserve site, Bradford on Avon, comment number 2146). All the comments can be viewed verbatim within the Council's consultation portal<sup>39</sup>. Within the consultation portal all representations can be viewed against the part of the Local Plan to which they relate whilst also being viewable based on who submitted comments.

**3.7** Unlike earlier stages of Local Plan preparation whereby engagement was aimed at shaping the Local Plan, at Regulation 19 the Council is satisfied that the Local Plan is complete and is inviting representations on whether stakeholders feel the plan is sound and / or legally compliant. These representations then define the context and the discussion within the subsequent independent examination.

**3.8** To help understand what stakeholders have said and to guide the independent examiner, as per the TCPR, it is important main issues are identified from those representations. To assist with this, and to understand what stakeholders have said against each part of the plan, tables of key issues have been provided within Appendix 2 summarising key elements of what stakeholders have said against each part of the plan. These key issues have then informed the formulation of main issues, a more succinct list of issues arising from the representations. Representors should understand that these lists of issues do not represent all issues raised through the consultation, rather those the Council have identified as main challenges to the soundness of the draft Plan. The more comprehensive list of key issues within Appendix 2 also provides information on who has informed each issue, providing further context behind each of the main issues.

**3.9** The main issues are presented in plan order in a series of tables. Consideration should be given that some main issues, whilst listed against a certain part of the plan, may reflect issues that have a wider application to simply that part of the plan. Within each table, where applicable, main issues may have been grouped under thematic headings. The presentation of main issues is preceded by a summary of what specific consultation bodies and neighbouring authorities have said.

**3.10** For both the tables of main issues and of what prescribed bodies and neighbouring authorities have said, Council responses have been issued in some circumstances, often against thematic headings, where this was considered helpful to provide context and response to overarching strategic matters of challenge to assist the examination process. These responses are also intended

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<sup>38</sup> Regulation 22(1)(c)(v) sets out the need to outline the number of representations made and a summary of the main issues. The main issues are detailed within the body of this report

<sup>39</sup> Available via the Council's [consultation portal](#)

to introduce and cross reference to other documents that have been prepared, such as statements of common ground, to help guide the reader to further information on matters raised through the consultation. Responses have not been issued to all matters raised in the interests of proportionality and on the understanding that in many cases the strategic responses issued by the council to certain themes provide an overarching context to any more specific and detailed main issues raised by consultees, the details of which can be borne out in the examination.

- 3.11** To assist the examination process, considering the main issues raised, the Council understands there may be the need for potential amendments to the proposed submission plan to clarify and improve its overall content. These, in part, may be presented within accompanying signposted documents such as statements of common ground for consideration in due course. A separate schedule of potential changes document has been prepared to help inform the inspector to potential changes to the plan for consideration and subsequently have not been the subject of public consultation or sustainability appraisal. This schedule has been submitted in accordance with the approach set out in the Planning Inspectorate's Procedure Guide for Local Plan Examinations (updated 28 August 2024).
- 3.12** A number of omission sites were submitted alongside arguments supporting these sites and informing the main issues raised. Every effort has been made to list omission sites against the relevant part of the plan / area to which they relate (e.g., Market town). |

### **3.2.1 Prescribed bodies and neighbouring authorities**

- 3.13** As anticipated by the TCPR and the Statement of Community Involvement, specific consultation bodies and neighbouring authorities have been consulted on the pre-submission proposals. A high level summary of the response from these bodies and the main issues raised is set out in below.
- 3.14** In some instances, given the strategic nature of some of the matters raised, the main issues raised within the representations of these bodies have been set out below and not repeated within the main issues against each individual part of the plan to avoid unnecessary duplication of such matters.

**Table 3.1 Summary of main issues raised by Natural England and Council response**

Natural England
<p><b>Summary of main issues raised</b></p>
<p>Regarding the impacts upon internationally important habitat sites and the Habitats Regulations Assessment, it was highlighted that ammonia had not been considered either as a toxic pollutant or as a contributor to nitrogen deposition and that the Habitats Regulations Assessment needed to address this. Similarly, uncertainty was reported in relation to there being sufficient water quantity to demonstrate that an adverse effect upon the integrity of designated sites could be ruled out and there being sufficient water available to also allow restoration of designated sites alongside meeting the needs of proposed new development. Policy amendments were also sought to strengthen the protection to the River Avon SAC and Bath and Bradford on Avon Bats SAC. For site allocations at Marlborough the Appropriate Assessment's acknowledgement of potential impacts upon the Kennet and Lambourn Floodplain SAC and Kennet SSSI were identified as an issue which policy may wish to seek resolution to.</p>
<p>Emphasis was placed on the importance of providing clear justification as to whether exceptional circumstance tests have been met and the importance of minimising landscape impacts within National Landscapes, highlighting that development in or around National Landscapes should only be brought forward if it can be demonstrated that harm is avoided.</p>
<p>In some instances, site / development management policy specific comments were issued recommending policy amendments. This included highlighting that where items such as Country Parks, public open space, buffer zones, habitat protection and retention were included in policy and / or concept plans, minimum areas should be stipulated for clarity and to ensure delivery. Where SANG was concerned, it was outlined that greater clarity would be beneficial on the sites the Salisbury SANG serves and the contribution each will make alongside more details on the delivery and timing of the proposed SANG in Salisbury. It was emphasised that this SANG should be delivered prior to occupation of development taking place in the interests of mitigating impacts to the New Forest SPA, SAC and Ramsar.</p>
<p><b>Council response</b></p>
<p>Concerns raised by Natural England with respect to the lack of consideration of ammonia as a toxic pollutant or as a contributor to nitrogen deposition were noted. Further work has been undertaken in this respect to understand the impacts of ammonia upon internationally important habitat sites via an air quality assessment that has informed an update to the Habitats Regulation Assessment.</p>
<p>Wiltshire Council has also commissioned the preparation of a Water Cycle Study which will be submitted in support of the Local Plan for examination. The Water Cycle Study aims to address concerns raised by Natural England relating to uncertainty as to whether there is sufficient water quantity to demonstrate that an adverse impact upon the integrity of designated sites will not result from planned growth within Wiltshire and that there is sufficient water available to allow restoration of designated sites alongside meeting the needs of said new planned growth.</p>

## Natural England

Wording amendments sought by Natural England to strengthen policies, for instance relating to the River Avon SAC and Bath and Bradford on Avon Bats SAC, together with site specific comments will be addressed where considered necessary and discussed within a Statement of Common Ground.

Further response and consideration to additional strategic matters raised by Natural England is to be provided within a Statement of Common Ground being prepared to help inform the examination.

## National Highways

**Table 3.2 Summary of main issues raised by National Highways and Council response**

### National Highways

#### Summary of main issues raised

National Highways (NH) have advised that the Council will need to provide further information and detail to address outstanding concerns. The salient concerns identified from NH's response relate to the provision of additional information to better understand potential impacts to the Strategic Road Network (SRN) and the risks associated with current funding constraints for infrastructure projects.

With respect to issues relating to the potential impacts to the SRN, NH are unconvinced that the potential cumulative impacts to the SRN are sufficiently evidenced at this stage. It has been noted that the model used within Wiltshire Council's evidence base to assess traffic flow impacts and related issues is not the best tool for assessing local impacts at individual junctions or development locations.

Accordingly, NH have identified that operational assessments for key SRN junctions should be undertaken to inform the Local Plan evidence base. Those key locations which are referenced by NH relate to the M4 corridor, the A36 corridor and the A303, together with Policy specific commentary particularly around allocations.

In respect to funding, NH have identified that Wiltshire Council is currently awaiting the outcome of a bid for Major Road Network (MRN) funding from the Department for Transport (DfT). Whilst this is intended to address the impacts of planned growth, NH have noted that it does not necessarily account for additional logistics growth with direct impacts to the SRN.

Furthermore, NH have identified that the bid for funding is unresolved and that there is therefore a need to consider an outcome in which the MRN funding bid is unsuccessful.

Additionally, in respect of the Infrastructure Delivery Plan (IDP), which outlines infrastructure that is necessary for planned growth, NH note apparent significant shortfalls in funding available for transport schemes. The combination of shortfalls in funding within the IDP and the lack of approval for the M4 Junction 16 MRN represents a risk to the delivery of required infrastructure to support planned growth within the plan period.

## National Highways

### Council response

The main issues raised by NH focused on the main on the potential effect of the Local Plan's proposals on the SRN, including certain key junctions. In response, Wiltshire Council has commissioned further work in accord with a brief that NH endorsed. In addition, in accord with the duty to cooperate, the council has actively engaged with NH and their consultants through dialogue and an emerging Statement of Common Ground (SoCG). The SoCG will aim to focus on how the additional evidence from modelling and assessments will satisfy NH's concerns. Key topics in the draft SoCG include:

- An updated plan scenario using the Wiltshire Transport Model
- Clarity regarding how draft Policy 72 of the Plan will address potential impacts on the SRN associated with new development
- Additional commentary regarding mitigation of the M4 corridor, the A36 corridor and the A303
- Operational assessment/ junction modelling for key SRN junctions including M4 J16 and M4 J17. Further assessment of SRN junctions related to Ludgershall (A303), Beckington (A36) and Salisbury (A36).

## Environment Agency

**Table 3.3 Summary of main issues raised by Environment Agency and Council response**

### Environment Agency

#### Summary of main issues raised

The Environment Agency (EA) advised that the existing SFRA level 1 requires updating before it can be reliably used to inform allocations. It was highlighted within the EA response that there have been national policy changes, including climate change allowances, and new flood modelling in some areas since the current SFRA 1, which led to their request for an updated SFRA. Consequently, the EA is of the view that new site allocations which include areas of flood risk are unsound until they are supported by an updated SFRA level 1 (and level 2, where identified as necessary by the level 1).

Additionally, suggestion was made by the EA that the current wording of Policy 95 (Flood Risk) was disproportionately focussed on surface water flood risk, identifying that all sources of flooding must be represented within the Policy. Additional minor wording alterations were suggested to Policies 4 (Climate Change) 6 (Chippenham Principal Settlement), 88 (Biodiversity and Geodiversity), 89 (Biodiversity Net Gain), 90 (Trees, Hedgerows and Woodland), 93 (Green and Blue Infrastructure). Additionally, site specific comments were made on a variety of Policies.

## Environment Agency

Finally, the EA have stated a water cycle study should have been undertaken as part of the evidence base for this Review, specifying that this should cover the whole plan area. Without this water cycle study, the EA have stated that the associated risks of developing in the Marlborough Sewage Treatment Works (STW) catchment (and Hampshire Avon) have not been adequately assessed. The knock-on effect of this is that there is a lack of evidence that existing river and groundwater water quality status and wastewater infrastructure have been evaluated when determining if the locations of new development allocations are appropriate.

### Council response

In response to comments made by the EA advising that an updated SFRA would be required, Wiltshire Council acknowledge that the preparation of the plan has been based upon the 2019 Level 1 SFRA. Accordingly, to address concerns raised by the EA in this respect, the Council has commissioned a review of the existing SFRA, which will be submitted in support of the Plan. Where necessary, further detailed Level 2 SFRAs will be carried out to help support the Local Plan through the examination process.

In addition, JBA are also producing a Strategic Water Cycle Study at the request of the EA and in the light of the findings of the Habitats Regulations Assessment. The Study examines whether the level of planned and committed growth can be resourced with potable (drinking) water and serviced with sufficient wastewater treatment. The report is expected to outline the defensibility of the Council's position on water efficiency standards in all new development, as established in draft Policy 96 (Water resources). In addition, it will recommend whether through working with water utility companies (exchanging data on committed/planned growth) and their Water Resource Management Plans (funding bids to OfWAT to support growth), whether there is sufficient capacity within existing water treatment facilities, or scope to influence investment in improvements - a matter that Wessex Water are about to embark upon to assist with phosphate stripping within their operational catchment. Continued dialogue is being undertaken with Environment Agency to further these pieces of work.

Further response and consideration to additional strategic matters raised by EA is to be provided within a Statement of Common Ground being prepared to help inform the examination. This will include covering matters in respect of the potential for change to site specific policies.

## Historic England

**Table 3.4 Summary of main issues raised by Historic England and Council response**

## Historic England

### Summary of main issues raised

Historic England suggest that a heritage topic paper that pulls together the heritage evidence and works towards a positive strategy for Wiltshire would be beneficial. The evidence behind the heritage work and site selection process needs to be illustrated. More clarity is needed on where in the process heritage feeds into the site selection process and more detail is needed on what this evidence is. Historic England made a number of site specific comments in this regard which raised concern over the allocation or details of certain sites included within the Plan.

## Historic England

Historic England made a number of recommendations which in their view could bolster a 'positive' approach to heritage. This includes more reference to the Stonehenge, Avebury and Associated Sites World Heritage Site (WHS), greater reference to heritage in the vision for Wiltshire, outlining the positive impacts of prioritising brownfield development, the role of heritage for the visitor economy and greater reference to allocations such as the Devizes Wharf, Assize Court and Wadworth brewery site where heritage is a key factor.

In addition to recommendations for wording alterations in numerous areas, suggestions were also made for improving the wording for Policy 100 'The Stonehenge, Avebury and associated sites World Heritage Site'. Concern is raised over whether the World Heritage Site Supplementary Planning Document has been prepared and whether it is referenced within the plan, in addition to concern over the lack of an inclusion of a buffer zone in the plan for the WHS.

Historic England also ask that it is ensured their comments to the Regulation 18 consultation have been addressed.

### **Council response**

In response to suggestions for evidencing and signposting heritage work to support the selection of sites, a detailed Heritage Impact Assessment has been carried out by CBA for 7 sites which shall be published. Additionally, work has been carried out by internal heritage experts on a further 9 sites. The additional evidence prepared by CBA and internal heritage experts may be used to inform a number of policy wording changes or, where relevant, can be used to bolster Wiltshire's existing position.

Comments made by Historic England at Regulation 19 stage were predominantly focussed on the need to ensure Wiltshire's cultural heritage is sustained and enhanced where possible; that an evaluation has been carried out on the effectiveness of the current plan's approach to the historic environment; and, that it may be helpful to prepare a topic paper which reviews the opportunities, risks and challenges facing Wiltshire's historic environment and how the Local Plan should respond, ensuring it provides a clear and effective positive strategy as required by the NPPF. In response, Wiltshire Council notes that the historic environment is a cross-cutting theme that has been factored into many elements of the strategy and plan for Wiltshire, including informing housing requirements for settlements; place shaping priorities in the area strategies include heritage-based priorities; informing town centre development (paragraph 5.27 identifies heritage settlement for investment opportunities); the site selection process and sustainability appraisals; and regeneration projects. A paper will be prepared which signposts these elements to demonstrate the positive strategy for heritage within Wiltshire, which in turn will highlight how Historic England's Regulation 18 comments have been addressed.

Minor alterations to both policy wording and supporting text may be necessary in response to Historic England Comments. With specific regard to the comments made by Historic England against Policy 100, Wiltshire Council is in the process of preparing a WHS setting study together with reviewing whether buffer zones are necessary.

Further response and consideration to additional strategic matters raised by Historic England is to be provided within a Statement of Common Ground being prepared to help inform the examination.



## NHS Property Services and Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board

**Table 3.5 Summary of main issues raised by NHS Property Services and Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board and Council response**

<b>NHS Property Services and Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board</b>
<p><b>Summary of main issues raised</b></p> <p>Several policies were commented on by the NHS property services. Support was provided for Policy 5 Securing Infrastructure Provision from New Development, which identifies healthcare facilities as essential infrastructure delivered alongside new development. It has been identified that area strategies should more consistently identify broad areas of healthcare provision. Additionally, there is support for Policy 81 Community Facilities. However, the NHS request a modification to the second part of the policy (which aims to prevent loss of healthcare facilities), because the NHS will need to be able to dispose of redundant healthcare sites to improve efficiency.</p> <p>NHS property Services request that they are ongoingly involved in the Infrastructure Delivery Plan (IDP), but suggest that developer contributions have been omitted from the schedule in the IDP.</p> <p>NHS property services on behalf of the Bath and North East Somerset, Swindon, and Wiltshire Intergrated Care Board (ICB) support the overall spatial strategy. However, they suggest that it would be more effective if the approach to identifying broad locations and type of infrastructure was consistent.</p> <p>Policy 35 Salisbury District Hospital Campus is supported, but they request provision of high-quality affordable accommodation for key workers and students.</p> <p>In general, comments and a proposed modification are suggested for Policy 81 Community Facilities, and support for and commentary was provided on Policy 83 Health and Wellbeing and Policy 85 Sustainable Construction and Low Carbon Energy. Comments on the viability assessment and the IDP were also provided. Concern is raised that the securing of funding for healthcare via planning obligations will result in healthcare funding competing with other infrastructure.</p>
<p><b>Council response</b></p> <p>A Statement of Common Ground (SOCG) is underway with the NHS that will aim to provide further contextual information in response to the matters they have raised and areas of agreement/disagreement with Wiltshire Council. Minor alterations to policy wording may be necessary in response to the concern that that a more consistent approach is required in area strategies to securing funding from development for necessary healthcare provision, also in response to the concerns that Policy 81 will restrict NHS ability to change the use of NHS facilities. Wiltshire Council will consider the actions necessary within a Statement of Common Ground.</p> <p>Further response and consideration to additional strategic matters raised by NHS relating to the IDP will aim to be provided within the Statement of Common Ground.</p>

## Network Rail

**Table 3.6 Summary of main issues raised by Network Rail and Council response**

Network Rail
<p><b>Summary of main issues raised</b></p> <p>Reengagement with Network Rail has been requested where new or existing schemes affected by the draft Plan would be near any railway infrastructure, particularly track. In the case of mineral extraction, the influence zone of railway may be significantly larger for development proposals and thus early engagement is requested.</p>
<p><b>Council response</b></p> <p>Wiltshire Council will continue to engage with Network Rail where development would lead to an impact upon the railway network.</p>

## Swindon Borough Council

**Table 3.7 Summary of main issues raised by Swindon Borough Council and Council response**

Swindon Borough Council
<p><b>Summary of main issues raised</b></p> <p>Concern has been raised by Swindon Borough Council (SBC), principally in relation to the plan period, housing delivery, employment delivery, transport impacts and the wording of specified policies. Furthermore, suggestions are made that the draft Plan is currently overly inwardly focussed.</p> <p>With respect to the plan period, SBC have outlined that the current plan period of 2020-2038 is unlikely to provide the plan with sufficient length to comply with national policy. Accordingly, SBC have suggested that there is a need to consider the plan length and the implications for ensuring its housing and employment needs are met over a revised extended plan period.</p> <p>With respect to housing delivery, it is noted that the position of the new settlement north of Salisbury is inconclusive and it is suggested that the draft Plan needs to include more developed policies to facilitate the delivery of urban extensions and the new community option.</p> <p>With respect to employment concerns, SBC have suggested that the figures used within the draft Plan to guide employment demand are informal and notional. SBC have suggested that, following a review of the Employment Land Review Report, the draft Plan would lead to a significant employment land under-supply within the M4/Swindon Functional Economic Market Area and that additional employment sites are required to meet demand.</p>

## Swindon Borough Council

Finally, concern is raised with respect to the delivery of transport infrastructure, with SBC suggesting that plans to deliver infrastructure to support growth and the ability of the strategic infrastructure network to support further growth, particularly around M4 Junction 16, is lacking detail or certainty and there is no evidence of planning for ad-hoc development around M4 Junction 16. It is suggested that further junction and wider transport network testing may be required.

### Council response

Whilst the concerns of Swindon Borough Council have been noted with respect to the Plan period the Plan has taken time to prepare and to roll the end date forward by two years would require more evidence leading to further delay. A housing topic paper will provide further detail on delivery of the housing requirement. The Council remains committed to a future review of the Local Plan, which is proposed to include land for a new settlement within the southern part of Wiltshire's administrative area.

Regarding concerns raised by Swindon Borough Council relating to the sufficient allocation of employment land to meet predicted growth, Wiltshire Council have previously commissioned the Wiltshire Employment Land Review Update (July 2023) ('ELR'). The ELR has informed the allocation of sufficient employment land within Wiltshire, including the Swindon/M4 functional economic market area referenced by Swindon Borough Council.

Regarding concerns relating to the capacity of the strategic transport network (SRN), namely M4 Junction 16, to support planned growth, Wiltshire Council has instructed a review of the existing Wiltshire Transport Model which will feed into the Transport Evidence Base following positive engagement with National Highways. It is envisaged that the updated Transport Evidence Base will address concerns raised at Regulation 19 stage surrounding the capacity of the SRN to accommodate planned growth.

Wiltshire Council are in the process of preparing a Statement of Common Ground with Swindon Borough Council and intend to continue positively engaging with the authority to address cross boundary concerns.

## Cotswold District Council

**Table 3.8 Summary of main issues raised by Cotswold District Council and Council response**

## Cotswold District Council

### Summary of main issues raised

Cotswold District Council (CDC) offered in principle support to the draft Plan and identified the key cross boundary interests as development in proximity to the Councils' shared boundaries, at Kemble Airfield, Malmesbury and Cotswold Water Park. CDC raised no objection with the strategy for each of these respective areas within the draft Plan.

### Council response

### Cotswold District Council

Wiltshire Council will maintain an open dialogue with CDC moving forward to facilitate discussion on any further cross boundary issues which may arise. No further actions have been undertaken in response to CDC comments.

Wiltshire Council are in the process of preparing a Statement of Common Ground with CDC and intend to continue positively engaging with the authority to address cross boundary concerns.

## Bath and North East Somerset

**Table 3.9 Summary of main issues raised by Bath and North East Somerset Council and Council response**

### Bath and North East Somerset Council

#### Summary of main issues raised

The approach of Wiltshire Council to meet its housing need in full within its boundary is supported, together with maintaining a balance of homes and jobs which is resultantly not envisaged to lead to more commuting from the east into Bath. Ongoing dialogue has been expressly requested concerning:

- Broad locations of growth proposed later in the plan period and the monitoring and review of housing and employment delivery.
- Travel flows and traffic interventions concerning access to Bath from the east and the reopening of Corsham Train Station.
- The Habitats Regulation Assessment.
- The West of England Nature Recovery Strategy (LNRS) and opportunities for green infrastructure and LNRS connections between Wiltshire and B&NES.

#### Council response

Wiltshire Council has agreed to maintain a dialogue with B&NES in respect of the concerns raised in the bullet point list above. No further work has been completed in response to concerns raised by B&NES.

Wiltshire Council are in the process of preparing a Statement of Common Ground with BANES and intend to continue positively engaging with the authority to address cross boundary concerns.

## Test Valley Borough Council

**Table 3.10 Summary of main issues raised by Test Valley Borough Council and Council response**

Test Valley Borough Council
<p><b>Summary of main issues raised</b></p> <p>Test Valley Borough Council (TVBC) want to work closely with Wiltshire Council to support a cross-boundary housing development in Policy 40. The sites delivery is subject to agreement with southern link road to Andover Road (A42). But TVBC suggest that the trigger point of this road is unclear in policy.</p> <p>TVBC agrees with paragraph 4.198 that there is a need to expand the town into Test Valley, so they will be considering this in the TVBC local plan. TVBC also encourage future cross-boundary cooperation on infrastructure and habitat regulation issues.</p>
<p><b>Council response</b></p> <p>Modifications may be proposed to Policy 40 and/or supporting text to address the points raised by Test Valley Borough Council which will not impact on the overall intent of the policy. Wiltshire Council is in the process of preparing a joint Statement of Common Ground with Test Valley Borough Council and Hampshire County Council and intend to continue positively engaging with the two adjoining authorities.</p>

## Hampshire County Council

**Table 3.11 Summary of main issues raised by Hampshire County Council and Council response**

Hampshire County Council
<p><b>Summary of main issues raised</b></p> <p>Hampshire County Council (HCC) provided a late response in its capacity as a local highway authority on site allocation Policy 40 - Land South East of Empress Way, Ludgershall. HCC comment that Policy 40 requires a new vehicular access onto the A342 Andover Road, however the policy does not reflect that to connect the site to the A342 a new crossing of the Andover to Ludgershall MoD freight branch railway line would be required. Policy 40 should include the requirement for the development to fund or provide the railway crossing.</p> <p>The strategic flow of traffic on the A342 must not be impacted. The provision of the development link road, new junction on the A342 and rail crossing are significant pieces of infrastructure, must be funded by the developer and should be included in the Infrastructure Delivery Plan.</p> <p>A high-quality cycling route to connect the development with Andover should be required. For journeys into Hampshire the concept plan does not demonstrate an approach that prioritises active and sustainable modes of travel.</p>

## Hampshire County Council

### Council response

Modifications may be proposed to Policy 40 and its supporting text to address the points raised by Hampshire County Council will not impact on the overall intent of the policy. Wiltshire Council is in the process of preparing a joint Statement of Common Ground with Test Valley Borough Council and Hampshire County Council and intend to continue positively engaging with the two adjoining authorities.

## New Forest District Council

**Table 3.12 Summary of main issues raised by New Forest District Council and Council response**

## New Forest District Council

### Summary of main issues raised

New Forest District Council (NFDC) have offered broad support to the plan. Comments received have included critique of the wording of Policy 88, regarding the impact of housing delivery on protected sites in the New Forest National Park.

Furthermore, NFDC is supportive of the overall approach to delivering a new community in Policy 21, but they request that there is more detail on the scale of the community and whether it would be a self-contained settlement with adequate facilities.

### Council response

It is considered that the matters raised by NFDC are minor and easily resolved. Wiltshire Council is in the process of preparing a Statement of Common Ground with NFDC to discuss these matters and intend to continue positively engaging with the authority to address cross boundary concerns.

## New Forest National Park Authority

**Table 3.13 Summary of main issues raised by New Forest National Park Authority and Council response**

## New Forest National Park Authority

### Summary of main issues raised

The New Forest National Park Authority (NFNPA) are mostly supportive of the draft plan. The NFNPA suggests that some minor wording changes and figure alterations are required for the plan to be consistent with National Policy and legislation in the Levelling up and Regeneration Act 2023.

### Council response

## New Forest National Park Authority

Factual amendments may be considered as a result of this representation. These are considered minor in nature and are to be considered within the Statement of Common Ground.

Wiltshire Council is in the process of preparing a Statement of Common Ground with NFNPA to discuss these matters and intend to continue positively engaging with the authority to address cross boundary concerns.

## Dorset Council

**Table 3.14 Summary of main issues raised by Dorset Council and Council response**

Dorset Council
<p><b>Summary of main issues raised</b></p> <p>Dorset Council have acknowledged the wording of Policy 75 and consider that the policy gives sufficient flexibility to allow improvements to the A350 corridor within Wiltshire. The removal of the reserved bypass corridor for the A350 at Shaftesbury and the inclusion of the wording of Policy 75 related to this is therefore supported.</p> <p>No significant issues are identified from the levels of growth proposed in northern parts of Dorset or southwestern Wiltshire, though ongoing discussions relating to a coordinated delivery of bus routes is considered essential.</p> <p>Concern is identified relating to a strategic education site on the east of Shaftesbury owned by Dorset Council, but which falls within the administrative boundary of Wiltshire. Firstly, the draft Plan currently identifies the site as 'Open Space and Play Facility', despite the site having no public access. Secondly, the implications of 20% Biodiversity Net Gain (BNG) for development at Coombe House School may negatively impact the provision of enhanced facilities at the site. It is suggested that safeguards should be put in to create an exception for essential infrastructure, including education facilities, from the 20% BNG requirement. Finally, consideration should be given to Policy 92 (Conserving and Enhancing Dark Skies) in areas where lighting is required to enable the proper functioning of the site, for example, at Coombe House School.</p>
<p><b>Council response</b></p> <p>In response to comments raised by Dorset Council, Wiltshire Council acknowledge the potential for removal of Coombe House School as land designated as open space on the Policies Map under draft Policy 84 (Public Open Space and Play Facilities).</p> <p>With respect to the request for recognition in the policy to allow for appropriate lighting to be installed where required to enable the proper functioning of a given site, Wiltshire Council consider that Policy 92 and its supporting text provides a flexible and proportionate approach in respect of proposals within the Cranbourne Chase designated landscape and National Landscapes.</p>

## Dorset Council

Wiltshire Council is in the process of preparing a Statement of Common Ground with Dorset Council and intend to continue positively engaging with the authority to address cross boundary concerns.

## Somerset Council

**Table 3.15 Summary of main issues raised by Somerset Council and Council response**

### Somerset Council

#### Summary of main issues raised

Somerset Council have noted the lack of reference within Wiltshire Council's Duty to Cooperate report (September 2023) to the A303 which was highlighted within South Somerset Council's (now Somerset Council) response to the Regulation 18 consultation as a key area of the Strategic Transport Network for improvement (i.e. upgrading sections from single carriageway to dual carriageway) as part of an end-to-end improvement plan between the M3 and M5 junction at Taunton.

Additionally, Somerset have stated that National Highways have issued holding objections for development on the periphery of Frome and villages near the A36 until a programme of improvements is in place. It is noted allocated growth in Trowbridge is to NE and SW but there are reserve sites later in the plan period. Somerset have stated that they would welcome clarification regarding the Wiltshire position on impact of proposals on the A36.

#### Council response

In response to comments raised by Somerset Council, a factual amendment to the Duty to Cooperate report (September 2023) to reflect the South Somerset District Council Regulation 18 response concerning the A303 can be made.

With respect to providing clarification regarding Wiltshire's position on the impact of proposals on the A36, the council is currently in the process of updating its Local Plan review Transport Evidence Base, which supported the Regulation 19 consultation. It is intended to utilise this updated Transport Evidence Base to support the council's growth scenario and in turn address National Highways consultation responses, with the A36 presented as a particular area of focus, and in doing so additionally address concerns raised by Somerset Council. Towards the end of the plan period broad locations for growth will be identified. Because these broad locations of growth are intended to be identified towards the end of the plan period, and delivered beyond this date, they are excluded from the current Transport Evidence Base.

In respect of reserve sites, a reserve site has been identified at Bradford on Avon. However, this will only be implemented in the event of alternative sites in adjacent settlements not being brought forward in a timely manner. The scale and location of the reserve site is not deemed significant enough to raise strategic concerns and impacts for the A36.



## Somerset Council

Wiltshire Council is in the process of preparing a Statement of Common Ground with Somerset Council to discuss these matters and intend to continue positively engaging with the authority to address cross boundary concerns.

## 3.2.2 Main issues: Local Plan sections 1 and 2

**3.15** Presented below are the main issues raised by the representations with regards Local Plan section 1 and 2, namely:

- What is this Plan?
- How to use this Plan?
- How has this Plan been prepared?
- A spatial portrait of Wiltshire
- A spatial vision for Wiltshire

**3.16** Given the overlap and overarching nature of the opening two sections, these main issues have been presented in one table covering topics that transcend the draft Plan. In some instances matters contained within these main issues have been extracted from representations against other parts of the draft Plan to provide an orderly presentation of main issues on matters that are applicable to the draft Plan as a whole.

**3.17** Given section 1 of the plan encompasses the topic 'How the plan has been prepared', many of the main issues reported here relate to the process of local plan preparation alongside overarching main issues relating to the Local Plan evidence base, including the Sustainability Appraisal. Where more specific critique has been made against the evidence base, this may have been reported against the corresponding place / part of the plan to which it relates.

## Main issues: Section 1 & 2

**Table 3.16 Local plan section 1 and 2 main issues.**

Main issues: Section 1 & 2
<p><b>Consultation process</b></p> <ul style="list-style-type: none"><li>• <b>Too complex:</b> Regulation 19 consultation process was too complex and poorly set out.</li><li>• <b>Inadequate:</b> Representors critical of the adequacy of the Regulation 19 consultation in terms of notifications and advertisement (e.g., not notified of nearby site allocations).</li><li>• <b>Lack of consultation:</b> Concerns with regards a lack of prior consultation on proposals (e.g., Regulation 18). Some representors suggesting the proposals that are within the draft plan have not been adequately consulted upon prior to the Regulation 19 stage.</li><li>• <b>Statement of Community Involvement:</b> Lack of prior consultation means the Statement of Community Involvement has not been adhered to.</li></ul>

## Main issues: Section 1 & 2

### Policy & strategic objectives review lacks evidence and monitoring

- **No review and monitoring of policies to inform review:** The Council has not undertaken a review that assesses the effectiveness of existing policies. Whilst Appendix A presents a series of tables setting out how policies have been revised, there is no real analysis within the Plan or its evidence documents as to the effectiveness of the adopted Core Strategy to inform the review of policies.
- **No review and monitoring of strategic objectives:** The strategic objectives, as set out in the 2015 Wiltshire Core Strategy, have not been reviewed or monitored. These objectives are more than 10 years old and pre-date the publication of the NPPF and PPG. There is no assessment of whether the objectives should be amended in light of the Core Strategy's success or not in achieving them through an effective monitoring process and this should be undertaken.

### Site selection process

- **Joining / splitting of sites:** Sites have been joined / separated without any supporting evidence. The Site Selection Methodology provides no clarity on how sites are joined / separated based on an evidence based approach.
- **Place shaping priority assessment:** The site selection process as established through the use of the arbitrary Place Shaping Priorities is not sound and is based on subjective assessments rather than being based on the Sustainability Appraisal Process. The result has therefore made the draft allocations unsound.

### Sustainability Appraisal

- **Assessed site size incorrect:** Assessing a larger site size within the Sustainability Appraisal than is allocated and / or assessing a large site that ends up being split into large undeveloped areas is not effective and impacts site scores. The Sustainability Appraisal should appraise the sites taken forward.
- **Assessment of Alternative Development Strategies between Housing Market Areas:** Whilst the Sustainability Appraisal assesses Alternative Development Strategies 'within' Housing Market Areas, there is no assessment of Alternative Development Strategies 'between' them. The Sustainability Appraisal should consider alternative strategies for growth involving a redistribution between the Salisbury and Trowbridge Housing Market Areas.
- **Sustainability Appraisal not informed housing strategy:** The Sustainability Appraisal has not informed the new housing strategy, rather it has been a retrospective process to demonstrate that the Council's new method is the most appropriate and sustainable.
- **No assessment of broad locations for growth and reserve sites:** The consideration of reasonable alternatives with respect to broad locations for growth and reserve sites is flawed. The Sustainability Appraisal makes no reference to the appraisal of the three broad locations for growth identified in the Local Plan or reserve sites, nor consideration given to any reasonable alternatives to addressing longer term needs towards the end of the plan period.
- **Out of date evidence:** In relation to employment land, the Sustainability Appraisal is based on out of date evidence from 2016 and 2018 and therefore is in conflict with paragraph 31 of the National Planning Policy Framework, which requires the preparation and review of all policies to be underpinned by relevant and up-to-date evidence.

### Relationship to existing / other plans

## Main issues: Section 1 & 2

- **Existing adopted plans:** The Local Plan does not clarify the relationship to all existing adopted plans, such as the Wiltshire Housing Site Allocations Plan.
- **Minerals and Waste:** The minerals and waste policies for Wiltshire are all out of date. The Local Plan should have taken a proactive approach to updating the minerals and waste policies and to set realistic policies for the management of minerals and waste.

### Duty to Cooperate (DtC)

- **Statements of Common Ground / DtC evidence:** The Council have not produced, maintained or updated Statements of Common Ground with all of the Prescribed Bodies or Neighbouring Authorities, conflicting with NPPF and PPG requirements; inadequate up to date engagement demonstrated under the DtC between the Reg 18 and Reg 19 versions of the Local Plan.
- **Insufficient DtC with Swindon Borough Council:** Representors outlined DtC with Swindon as insufficient in terms of being out of date, not meeting employment needs and not meeting potential housing needs. Some representors outlined that any increased scale of residual housing needs in Swindon, that cannot be met within that authority area, should be addressed through Wiltshire's Local Plan; SoCG with Swindon is required.
- **Swindon Borough Council:** Indicated that further work is needed under the DtC with this DtC partner.
- **Taking growth from neighbouring authorities:** There are shortfalls in the wider region (at Bristol City and North Somerset) which should be considered as factors supporting a higher housing requirement, given constraints at BANES and South Gloucestershire. A lack of SoCGs with neighbouring authorities raises concern that there may be unmet needs that have not been addressed.
- **Insufficient DtC with DtC bodies:** Some representors outlined a concern that Wiltshire Council have failed to adequately consult with DtC bodies such as Natural England, Historic England, National Landscape boards, National Highways etc. Particularly in reference to site allocations.

### Transport evidence

- **No detail:** Without detail it is hard to understand and critique whether / how the Atkins work has taken into consideration the proposed development within the Local Plan alongside any possible growth outside of county and the impact of this.
- **Junction 16 impact:** The Atkins transport TEB does not include a detailed assessment of Junction 16 (M4).
- **Out of date:** The transport data used is outdated and does not consider the latest traffic issues (E.g., Melksham bypass assessment of need).
- **Impacts upon strategic road network:** Highways England outline the potential cumulative impacts for the SRN are not sufficiently evidenced at this stage, including the performance of individual SRN junctions.
- **Strategic Modelling not best tool for local junctions:** Traffic modelling has used a strategic highway and multi modal modelling tool. The Atkins report notes that the model is not the best tool for assessing local impacts at individual junctions or development locations. However, National Highways are unclear if further work will be undertaken to investigate the impacts of traffic flow changes on SRN capacity and this should be clarified.
- **Operational assessment of key SRN junctions required:** National Highways position that the potential traffic flow impacts of Local Plan growth need to be demonstrated by way of operational assessment for key SRN junctions, and that this work should be undertaken to inform the Local Plan evidence base.

## Main issues: Section 1 & 2

Whilst strategic modelling work is helpful in enabling some understanding of emerging highway issues and mitigation requirements associated with the proposed level of growth, it is not sufficient to evidence the performance of individual SRN junctions.

### Viability appraisal

- **Small sites assessment insufficient:** In assessing the viability of delivering smaller sites concerns were raised over the assumptions that appear to underpin the viability assessment and therefore the ability for development to meet all the relevant policy requirements and deliver expected infrastructure provision. The assessment should consider a range of smaller sites and not treat a c6 unit scheme the same as a c49 unit scheme.
- **Lacks detail:** Comments indicated that the Viability Assessment supporting the draft Plan does not include specific costs, for instance for site allocations there appear to be many generalised statements with the appraisal stating that significant additional items of infrastructure with unknown costs can be absorbed within the viability's headroom (e.g., when looking at the delivery of Land North East of Hilperton). This is vague and lacks detail.
- **Assumptions challenged:** Concerns were raised about viability assumptions including GDV, developer profit on market housing, allowance for infrastructure works and benchmark land value. Such assumptions were challenged in the context that they go to the heart of the setting of realistic, deliverable policies including with regards affordable housing. Similarly the development densities assumption (36 dwellings per hectare for 5 unit schemes and 37 dwellings per hectare for anything larger) were challenged as unrealistic, particularly for smaller sites.

### Infrastructure Delivery Plan

- **Doesn't reflect required infrastructure / responsibility:** Within the policies of the draft Plan there are references to required infrastructure provision, for instance within place specific / site allocation policies. Yet, such items do not appear to be reflected within the Infrastructure Delivery Plan (e.g., Mane way, Westbury railway crossing). The update to the infrastructure delivery plan also does not identify any specific infrastructure where joint working may be necessary as indicated within Policy 5.

### Local Transport Plan

- **Required in support of Local Plan:** The Local Transport Plan should be prepared alongside and in support of the draft Plan.

### Sequential Test / Strategic Flood Risk Assessment / Water Cycle Study

- **Sequential test requirement for Local Plan:** The Plan doesn't make it clear if the Sequential test has been followed for new allocations as per Environment Agency representation. Following the sequential approach, should be preceded by applying the sequential test. The plan doesn't make it clear if the sequential approach has been followed for new allocations.

## Main issues: Section 1 & 2

- **Strategic Flood Risk Assessment required:** The existing SFRA Level 1 requires updating before it may be used to inform (and evidence) new allocations as per Environment Agency representation. Updates to national policy and more recent and better flood modelling is now available. Any new site allocations, that include areas at flood risk, are unsound until supported by an up-to-date SFRA Level 1 (and Level 2 where identified as necessary by the Level 1).
- **Water Cycle Study required:** There is a lack of evidence to demonstrate that existing river and groundwater quality status & waste water infrastructure have been evaluated when determining locations for new allocations as per Environment Agency representation. This could also evidence that Wastewater Treatment Works have sufficient headroom to accommodate development growth over the plan period.

### Heritage evidence

- **Transparency of evidence:** Historic England outlined that it is not clear what heritage evidence has been gathered and applied, how assessment has been carried out and by whom. It should be evident how understanding of the historic environment has informed a positive strategy, policy and principal, form, capacity and design of allocations. The 2021 consultation committed to further assessment of the historic environment and these assessments are not available.

### Habitats Regulations Assessment

- **Ammonia omission and water quantity uncertainty:** Ammonia has not been considered as either a toxic pollutant directly or as a contributor to nitrogen deposition and the HRA needs to address this omission as per Natural England representation. Similarly Natural England report uncertainty relating to the ability to demonstrate that an adverse effect upon the integrity of designated sites can be ruled out and that sufficient water will be made available to allow restoration of designated sites whilst also meeting the needs of the new development proposed within the Local Plan.

### Employment evidence

- **Employment land review conservative / out of date:** Employment land review is too conservative, underestimating demand, is uncertain and based on contradictory economic forecasts that are out of date. Post pandemic influences on working patterns are now starting to be understood and the effects of Brexit are becoming apparent, census data is being published and changing retail habits are widely known. It is necessary to fully review Functional Economic Market Areas with distribution of growth requiring flexibility to be built in.
- **Strategic logistics need:** There is a lack of assessed need for strategic logistics that would inform the allocation of suitable sites.
- **Capacity of existing employment sites:** There are unrealistic assumptions over the capacity of existing employment sites to deliver further employment.

## Council responses

### Consultation process

## Main issues: Section 1 & 2

A series of reports have been prepared to document the consultation the Council has undertaken in preparing the Local Plan. These reports alongside the process and outcomes involved in undertaking the Regulation 19 consultation, and the way in which the Council has undertaken consultation in accordance with its legislative duties and Statement of Community Involvement, has been summarised within this Regulation 22 (1)(c) Consultation Statement.

### Policy review

The scope of the Wiltshire Local Plan review encompasses the updating of existing Wiltshire Core Strategy development management policies to ensure their continued consistency with national policy and to introduce further detailed development management policies as part of a review of the saved development management policies not replaced by the Wiltshire Core Strategy. Appendix A of the Local Plan outlines a schedule of policies, presenting a series of tables which set out how policies have been revised as part of the Local Plan Review. It was not the purpose of the review to change or remove strategic objectives or policies that remain in accordance with national policy and support the delivery of sustainable development.

### Site selection process

Many objections to the Local Plan relate to individual sites. The challenges largely relate to choice of site and a range of arguments based on policy and technical concerns over the impacts that new development may bring to existing communities.

The methodology followed for site selection is documented within a separate paper<sup>40</sup>. The detail of the site selection process for each Principal Settlement and Market Town is then outlined in a series of 'Planning for....' documents<sup>41</sup>, one for each of these settlements, published as part of the Regulation 19 consultation. The process, following consultation in 2021 on a pool of reasonable alternative sites, was informed by the range of responses and evidence received as part of that consultation.

In summary, starting from a pool of available sites, informed by the the Strategic Housing and Economic Land Availability Assessment<sup>42</sup>, the selection of sites for development followed a four stage process. The process started with an exclusionary stage of sites clearly unsuitable or unavailable. Following a second stage that sifted sites further based on a range of criteria, the remaining pool of potential development sites went through sustainability appraisal<sup>43</sup>. Prior to sustainability appraisal and following stage 2 there was a judgement made on site assembly. This reflected that land promoted for development is defined by land ownership boundaries and over what land a prospective developer has an interest. It does not necessarily represent what land is needed for a logical or sensible development proposal. A logical proposal may be smaller or larger or combine different owners' interests based on a range of different considerations. These decisions are documented within the 'Planning for....' documents.

<sup>40</sup> [Wiltshire Local Plan Site Selection Methodology](#), Wiltshire Council (September 2023)

<sup>41</sup> published as part of the Regulation 19 consultation on the Local Plan and available via the [council's website](#)

<sup>42</sup> The Wiltshire Council Strategic Housing and Economic Land Availability Assessment (SHELAA) is available from the [council's website](#). The SHELAA was last formally published in 2017, but new sites submitted to the council since then have also been considered through the site selection process

<sup>43</sup> [Wiltshire Local Plan Sustainability Appraisal \(incorporating Strategic Environmental Assessment\) Annex 2.1 - 2.15](#), Wiltshire Council (September 2023)

## Main issues: Section 1 & 2

Stage 4 then saw a review of these results against place shaping priorities and the selection of preferred sites that could accommodate the scale of development needs at a settlement. Stage 4 acknowledged that overall results from sustainability appraisal can be finely balanced and the purpose of stage 4 was to undertake further assessment of site options to select a preferred set of sites that address local priorities; ensuring they help deliver the outcomes communities want to see or the very least do not undermine goals they want to see achieved. Place Shaping Priorities represent a summary of the outcomes sought for each main settlement over the plan period and have been discussed with the parish, town and city councils. Communities were also asked for their views on their content as a part of public consultation with this being considered when finalising the priorities.

### **Sustainability Appraisal**

The Sustainability Appraisal<sup>44</sup> incorporates Strategic Environmental Assessment and is an iterative assessment process undergone from an early stage to ensure that potential significant effects arising from the plan are identified, assessed, mitigated and communicated to plan-makers. A non-technical summary has been prepared summarising the process and findings, from scoping through to the preparation of the Local Plan<sup>45</sup>.

For distributing growth, a range of Alternative Development Strategies were tested for different distributions of employment and housing growth by Housing Market Area with the findings of these assessments informing an emerging spatial strategy, consulted upon in 2021, with a revised spatial strategy eventually being established following further work and assessment. Chapter 4 of the Sustainability Appraisal alongside Annexes 1.1 - 1.4 provide further detail of this work.

Similarly, following initial stages of site selection, reasonable alternative potential development sites at principal settlements and market towns underwent sustainability appraisal (stage 3 of site selection). Chapter 5 of the Sustainability Appraisal alongside Annexes 2.1 – 2.15 provide further detail of this work. Chapter 6 of the Sustainability Appraisal then presents a qualitative assessment of the Local Plan objectives and policies against the sustainability appraisal framework. Recommendations for improving policies in sustainability terms were set out in Chapter 6 and Appendix B of the Sustainability Appraisal Report. Appendix B shows the Council's responses to these recommendations.

### **Duty to Cooperate**

The legal duty to cooperate on strategic priorities and matters has underpinned the plan making process. Regular, meaningful and continuing dialogue with prescribed bodies has taken place and this has been set out in the Duty to Cooperate report. Comments received at the Regulation 19 stage from prescribed bodies are summarised and set out within the prescribed bodies and neighbouring authorities section of this report. Whilst some concerns were raised with aspects of the Local Plan, in all cases the council has worked and continues to work towards resolving such matters in a constructive manner. Statements of common ground are being prepared with these bodies, focusing on key issues to establish common ground on matters of principle. To inform the examination process and assist the Inspector, these statements will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector to address any soundness and/or legal compliance issues.

<sup>44</sup> [Wiltshire Local Plan Sustainability Appraisal \(incorporating Strategic Environmental Assessment\)](#), Wiltshire Council (September 2023)

<sup>45</sup> [Sustainability Appraisal Report \(incorporating Strategic Environmental Assessment\) Non-Technical Summary](#), Wiltshire Council (September 2023)



## Main issues: Section 1 & 2

### Transport evidence

Transport evidence has been prepared alongside the preparation of Local Plan to inform the decisions made. Initially evidence was published<sup>46</sup> as part of the 2021 Regulation 18 consultation. Whilst the outcomes of that transport assessment were deemed a robust assessment of Wiltshire's growth agenda, it did highlight the need for further consideration of site allocations and did not reflect Wiltshire's committed policy position in relation to carbon neutrality. Following revisions to the housing allocation in terms of numbers and locations there was a need for an updated transport assessment of those changes which led the publication of a transport evidence base document<sup>47</sup>, published as part of the Regulation 19 consultation. Transport considerations have also been a key part of site selection, including Sustainability Appraisal.

Following detailed comments submitted by National Highways, calling for further evidence to demonstrate the potential impacts of planned growth on the Strategic Road Network are capable of being mitigated appropriately, Atkins have been commissioned to undertake further work. This work includes further microsimulation modelling relating to functionality of Junction 16 and 17 of the M4, along with junction and route modelling covering the A road network. This work will be largely complete before submission and is following a brief agreed with National Highways. In terms of information to help assist the examination:

- A Transport Topic Paper will clarify the outcome of this work.

### Viability Appraisal

As anticipated by national planning policy and guidance, the Local Plan is supported by a proportionate assessment of viability<sup>48</sup>. This was published and made available as part of the Local Plan Regulation 19 consultation. As outlined within the main issues, these challenges generally focus on certain core assumptions that had been applied by the Council's consultants. In addition, challenges were submitted relating to the projected costs associated with certain draft policies (e.g. delivering 20% Biodiversity Net Gain, 40% affordable housing, sustainable construction and higher than current Building Regulations water efficiency standards).

Other viability-related challenges were focused on certain allocations where developers and members of the community considered the Plan's viability assessment had underestimated physical build costs associated with roads, schools and wider infrastructure needed to support growth. The Council's consultants have appraised these challenges and advised that generally they effectively constitute a professional difference of opinion.

### Infrastructure Delivery Plan

<sup>46</sup> [Wiltshire Local Plan Transport Review](#), Atkins (January 2021)

<sup>47</sup> [Wiltshire Local Plan Review 2022 Transport Evidence Base](#), Atkins (May 2023)

<sup>48</sup> [Assessment of Local plan viability and the review of the Wiltshire Community Infrastructure Levy Charging Schedule](#), Urba and Portal Planning Economics (September 2023)

## Main issues: Section 1 & 2

The primary aim of the Infrastructure Delivery Plan (IDP) is to outline strategic infrastructure requirements that support the overall growth and development objectives of the Local Plan. This includes major infrastructure projects that have broad impacts across the region. While the IDP does reference required infrastructure provision within place-specific or site allocation policies, it is important to note that detailed, site-specific infrastructure needs are typically addressed at later stages of the planning process, such as during the planning application stage.

In some instances, such as example of the Westbury railway crossing off Mane Way, their detailed planning and inclusion will be addressed as more information becomes available and as part of the periodic updates to the IDP. This ensures that the plan remains flexible and responsive to emerging needs and priorities.

Additionally, the IDP acknowledges the importance of joint working for infrastructure delivery. While specific projects requiring joint efforts may not be explicitly listed at this stage, Policy 5 emphasises the need for collaboration with various stakeholders, including local authorities, service providers, and the community, to ensure effective and coordinated infrastructure delivery. Wiltshire Council is committed to periodically updating the IDP to reflect new information and to ensure that all necessary infrastructure is planned and delivered in a timely and efficient manner.

### **Sequential Test / Strategic Flood Risk Assessment / Water Cycle Study**

In their comments, the Environment Agency (EA) suggested the Local Plan would benefit from updates to the 2019 Level 1 Strategic Flood Risk Assessment (SFRA)<sup>49</sup> as this would help underpin the Council's site selection process. JBA, who prepared the 2019 SFRA have been commissioned to undertake this work. Where necessary, further detailed Level 2 SFRA's will be carried out to help support the Local Plan through the examination process.

In addition, JBA are also producing a Strategic Water Cycle Study at the request of the EA and in the light of the findings of the Habitats Regulations Assessment. The Study examines whether the level of planned and committed growth can be resourced with potable (drinking) water and serviced with sufficient wastewater treatment. The report is expected to outline the defensibility of the Council's position on water efficiency standards in all new development, as established in draft Policy 96 (Water resources). In addition, it will recommend whether through working with water utility companies (exchanging data on committed/planned growth) and their Water Resource Management Plans (funding bids to OfWAT to support growth), whether there is sufficient capacity within existing water treatment facilities, or scope to influence investment in improvements - a matter that Wessex Water are about to embark upon to assist with phosphate stripping within their operational catchment. Continued dialogue is being undertaken with Environment Agency to further these pieces of work.

### **Heritage evidence**

Heritage is a cross cutting theme throughout the Local Plan. To illustrate this and in response to the Historic England representation a Heritage Topic Paper is being prepared to signpost to where heritage has informed the Local Plan, and to outline the heritage evidence that has shaped the allocations. In terms of information to help assist the examination:

- A Heritage Topic Paper is being prepared to provide greater clarity on how the Plan has addressed heritage matters to support the examination.

<sup>49</sup> [Wiltshire Council Level 1 Strategic Flood Risk Assessment](#), JBA Consulting (May 2019)

## Main issues: Section 1 & 2

In response to concerns raised by Historic England regarding the level of evidence underpinning heritage matters for 7 of the proposed allocated sites, CBA have been commissioned to produce detailed Heritage Impact Assessments. This work will conclude whether each of the 7 sites assessed are capable of delivering development subject to mitigation. Amendments to certain policies may be suggested for consideration by the Inspector in the interests of clarity and precision.

### **Habitats Regulations Assessment**

LUC was commissioned by the Council to carry out a Habitats Regulations Assessment (HRA) of the Local Plan. For the Regulation 19 consultation the HRA published <sup>50</sup> was the iteration assessing the impacts of the Regulation 19 Local Plan that was consulted on in Autumn 2023 and should be read in conjunction with this document.

Natural England advised that the Habitats Regulations Assessment (HRA) of the Plan would benefit from an assessment of ammonia levels and air quality associated with vehicular movements. This work includes modelling to better understand the potential impact relating to ammonia deposition that planned development may have on European designated sites. The outcome of this is included in an update to the HRA. In addition to the updated HRA, work is ongoing to finalise in agreement with Natural England mitigation strategies for all protected sites. This information will be reflected within the Statement of Common Ground with Natural England.

### **Employment Evidence and logistics**

Employment forecasts were commissioned in 2021 and economic modelling was undertaken then. To allow for possible variations in global, national, and regional economic drivers, the Employment Land Review <sup>51</sup> uses two independent sets of economic forecasts and sets out a central and alternative (higher) growth scenario.

Specific concerns regarding a lack of support in the Local Plan for large-scale logistics development, with a particular focus on Junctions 16 and 17 of the M4 motorway, were received. The evidence to support these arguments is largely focused on the importance of motorway junctions and a reported need for more logistics space around such junctions. Whilst the Plan at paragraph 4.221 does not support a further extension of the urban area of Swindon into land within Wiltshire around Junction 16, draft Policy 64 (Additional employment land) positively supports national and regional logistics development at Junction 17, subject to criteria.

<sup>50</sup> [Wiltshire Local Plan Review Habitats Regulations Assessment Appropriate Assessment](#), LUC (September 2023)

<sup>51</sup> [Wiltshire Employment Land Review Update. Final Report](#), Hardisty Jones Associates (September 2023)

### 3.2.3 Main issues: Local Plan section 3

3.18 Presented below are the main issues raised with regards Local Plan section 3, namely:

- Settlement strategy (Policy 1)
- Delivery strategy (Policy 2)
- Reserve sites for housing and broad locations for growth (Policy 3)
- Climate change strategy (Policy 4)
- Infrastructure delivery (Policy 5)
- Area strategies explained

3.19 Given the interconnection between policies 1 and 2, the presentation of main issues against these two policies has been combined into one table.

3.20 The area strategies explained main issues are contained here due to their overarching nature and their interconnectedness with the main issues present against policies 1 and 2. Please also note, a number of omission sites were submitted as part of the consultation that sat alongside many of the main issues raised. Every effort has been made to list omission sites against the relevant part of the plan to which they relate (e.g., Market town). Similarly specific infrastructure concerns are listed against place / site policies.

### Main issues: Policy 1 (Settlement Strategy) and policy 2 (Delivery Strategy)

Table 3.17 Local plan Policy 1 (Settlement Strategy) and policy 2 (Delivery Strategy) main issues and Council responses

Main issues: Policy 1 (Settlement Strategy) and policy 2 (Delivery Strategy)
<p><b>Housing numbers and delivery</b></p> <ul style="list-style-type: none"><li>• <b>Insufficient housing delivery and contingency:</b> Policies 1 and 2 set the overall strategy for planned growth. Linked to housing delivery, concerns were raised insofar as the approach taken in relation to planning for future growth, questioning the soundness of the Settlement Strategy given that, when taken together with the Delivery Strategy, it is not delivering sufficient housing (some representations referencing a subsequent lack of affordable housing delivery and consideration). Representors felt the Local Plan is not ambitious enough and fails to deliver sufficient certainty in terms of housing delivery in what appears to be a strategy of constraining growth. The Local Plan does not allocate enough land to maintain a housing land supply and fails to factor in contingency to maintain housing land supply. Doubts voiced that the proposed site allocations can be delivered as quickly as suggested in the Plan. Constraints within the Salisbury HMA may lead to under delivery across the County and there is a need for contingency to allow for this. Overall, it fails to meet the National Planning Policy Framework requirement to boost housing supply.</li></ul>

## Main issues: Policy 1 (Settlement Strategy) and policy 2 (Delivery Strategy)

- **Housing delivery at end of plan period:** There is a reliance on broad locations for growth and a new settlement later in the plan period and yet the plan is silent on how these components will be delivered which does not reflect a positively prepared plan. Focus on delivery towards the end of the plan period is not justified and raises uncertainty in terms of delivering growth.
- **Phasing of housing delivery:** The justification for a phased / stepped delivery was questioned. The proposed phasing raises issues regarding the five-year housing supply, with a potential shortfall in the early to middle stages and an over-reliance on high delivery rates later on. The trajectory's fluctuations and the low initial rates do not comply with the National Planning Policy Framework's mandate to boost housing supply and may negatively impact affordable housing, employment, and population growth. The lack of evidence supporting the phased approach and the non-specific housing trajectory call for a more detailed plan. Some comments outlined that the Local Plan should specify whether and how housing growth should be phased within each HMA, rather than dealing with the whole of Wiltshire in an identical fashion, critiquing that the reason for proposing a lower rate of growth earlier in the plan period only appears to relate to the Salisbury HMA.
- **Housing need / standard method challenge:** The overall scale of growth, based on the standard method requires review. The Objectively Assessed Need for the county should be higher (some representors suggested and provided a higher calculated figure). The standard method for calculating housing need is a starting point not a limit.
- **Reliance on complex greenfield urban extensions:** The approach to housing allocations places too much emphasis on large greenfield sites, relying largely on urban sprawl. The Local Plan should reduce its reliance on large urban extensions by allocating a mix of medium and smaller housing sites across Market Towns, Service Centres, and Villages.
- **Role of Brownfield land insufficient:** The plan currently lacks emphasis on using brownfield sites. Similarly, the proposed Settlement Strategy does not provide scope for the redevelopment of previously developed land located within the countryside but well related to an existing settlement. This is contrary to the National Planning Policy Framework (paragraph 119 and 121).
- **No consideration to prior delivery:** No consideration has been given to previous delivery rates / historic under delivery.
- **Neighbourhood plan reliance / housing numbers:** Neighbourhood plans play a significant role, but their reliance on unpermitted sites poses a risk to housing supply. Remove reliance on neighbourhood plans to deliver housing, ensure that housing delivery numbers are not based on assumptions regarding neighbourhood plans. Neighbourhood plan requirements should also be outlined as a minimum in accordance with national policy. There appears to be no justification for the 10% (of overall housing requirement) housing figure requirement. If neighbourhood plans are to be relied upon, there needs to be a mechanism in place to ensure delivery occurs.

### Plan period

- **Plan period too short:** The plan period covers 2020 to 2038. Given the work yet to do the Local Plan is unlikely to be adopted until 2025. Even if adoption by the end of 2024 is achieved, this would effectively still only provide 14 years between adoption and the expiration of the plan which is short of the 15-year period required by the National Planning Policy Framework. The vision should look ahead to a longer plan period and the housing requirement should be uplifted to reflect an extended plan period. This will mean that additional land for housing will be needed to ensure certainty of supply during the Plan period. The extension also addresses the Council's history of delayed Plan timelines.

## Main issues: Policy 1 (Settlement Strategy) and policy 2 (Delivery Strategy)

### Employment development and strategy

- **Relationship with housing growth:** The proposed housing approach may not support forecasted job growth adequately. There are concerns about the housing target being too low to align with employment projections and job growth aspirations. The housing requirement is only tested against the 'central' scenario, not whether it aligns with the employment land requirement. The plan's employment land demand exceeds the upper limit of growth scenarios outlined in the evidence base. Housing provision seems to be based on a minimum requirement rather than aligned with higher growth ambitions.
- **Insufficient employment allocations:** The Local Plan provides insufficient employment land compared to the potential demand identified in the Employment Land Review (ELR), suggesting a need for between 160 ha and 206 ha. More employment allocations are required to meet the demand as conveyed within the evidence.
- **Reliance on mixed use allocations:** There is an over reliance on 'mixed use' urban extensions and brownfield land to deliver employment growth. The assumption that mixed-use sites are automatically suitable for employment land overlooks potential barriers.

### Settlement strategy challenge

- **Insufficient testing and flexibility of strategy focusing on main settlements:** The strategy fails to properly examine whether growing Wiltshire's 'main settlements' is the right strategy and more flexibility and responsiveness should be built into the strategy. The Plan and its evidence also appears inconsistent given references to 'Main Settlements' appear to include Principal Settlements and Market Towns, but this is not clear within Policy 1.
- **Settlement hierarchy challenge (settlement classification):** Challenge was received that, given the services and facilities of some locations and / or the role they play given their strategic location, that the settlement hierarchy was not reviewed or reflects specific circumstances (E.G., Lyneham upgraded, Hilperton downgraded given constraints, Hullavington upgraded given strategic location). The definition and identification of a settlement within the hierarchy has not been consistently applied and requires review (E.G., Laverstock and Ford).

### Distribution of growth / alternative development strategies

- **HMA approach inflexible:** The proposed Housing Market Areas appear to constrain growth potential and flexibility to address trend-based growth. The draft Local Plan should include a clear explanation of the role of Housing Market Areas.
- **Distribution of growth challenge:** The Plan offers a step change in terms of disaggregating growth and the justification behind the distribution of growth is challenged in terms of the distribution options tested and the selection of the most suitable option for distributing growth. Some representors outlined that more growth / emphasis should be placed on Chippenham and Trowbridge HMAs.
- **Distribution of growth (Swindon):** The Plan and its evidence fails to consider reasonable alternative site options on the western edge of Swindon, not recognising the role and needs of Swindon. This appears to be based on the flawed assumption that just because Swindon Borough Council can meet their own housing needs there is no need for Wiltshire Council to allocate land for housing on the edge of the Borough in what is Wiltshire's part of the overall Swindon Housing Market Area. The principle of rejecting sites that do not adjoin settlement boundaries is also flawed, with the west of Swindon being a prime example of this.

## Main issues: Policy 1 (Settlement Strategy) and policy 2 (Delivery Strategy)

### Role of rural settlements / neighbourhood planning

- **Challenge to rural housing requirements:** Concerns regarding the approach to housing at the 76 Large Villages in the County and by the assumptions contained within the Rural Housing Requirements Paper which appears to provide a pro-rata delivery rate for each village. This makes no allowance for villages that have exceeded supply through windfalls. Greater flexibility should be built in to allow for neighbourhood planning groups to allocate housing appropriate for their community as opposed to being constrained by rigid targets.
- **Insufficient growth and recognition of role of lower-order settlements / rural areas:** The scale of growth across Wiltshire and particularly within rural areas and at lower-order settlements was considered to be insufficient and should be increased, unjustifiably based on the premise they need only meet their own development needs. It is not clear how the approach set out in Policy 1, in combination with the distribution of development proposed under Policy 2, is consistent with the national planning policy objectives of enhancing the vitality of rural communities, or providing opportunities for villages to grow and thrive, especially where this will support local services. This is true of both housing and employment development.
- **Functional relationships between settlements and flexibility:** The spatial strategy should be flexible, for instance recognising clusters of villages may collectively offer a wider range of services and facilities making them collectively sustainable locations for growth whilst acknowledging that service availability and enhancements may only come with (higher) growth. These lower order settlements comprise a significant proportion of Wiltshire's population and it is important that local needs and requirements are reflected in order to ensure a sustainable and proportionate distribution of growth.
- **Allocate small and medium sites:** The Emerging Local Plan should allocate more medium to smaller sites in rural areas. Concerns arise due to the lack of clear mechanisms for rural growth, especially if neighbourhood plans are delayed or not developed. Some objected to the arbitrary limit on site size in neighbourhood plans and suggest its removal for efficient housing delivery in rural areas.
- **Neighbourhood planning uncertainty:** There is a lack of direction behind how and when Neighbourhood Plans should be prepared by local communities. Given the reliance on neighbourhood plans to deliver housing, the local plan needs to be more explicit on how and when a Wiltshire Council led housing allocations plan will come forward should neighbourhood plans fail to deliver housing on local housing need. Neighbourhood plans do not have to allocate housing sites and yet they appear to be relied upon to do so.

### Local separate identity / character and development constraints

- **Need for protection:** Representors outlined the need to protect lower order settlements and features from being subsumed into higher order settlements and protect their separate identity and character.

### Constrained settlement unexplained

- **Unexplained constrained settlement criteria / challenge:** The delivery strategy reduces housing numbers in Principle Settlements and Market Towns on the basis that some of these settlements are "constrained". The concept of "constrained settlements" is not explained or justified and therefore renders the strategy unsound. Whilst it is acknowledged that certain settlements are 'constrained' for a variety of environmental reasons (flood risk, AONB, heritage and landscape) this should not preclude development to the level of that is being proposed by the strategy at numerous locations. The identification of broad locations for growth and a new settlement in themselves indicate constraints can be overcome.

## Main issues: Policy 1 (Settlement Strategy) and policy 2 (Delivery Strategy)

### New Settlement not justified and unclear

- **New Settlement not justified and unclear:** The proposed new settlement planned for delivery in the Salisbury Housing Market Area during the back end of the Plan period is not justified. Other reasonable alternatives (e.g. more housing at Chippenham and Trowbridge) should have been assessed. There is a lack of clarity and precision on the role of the new community / area of search.

### Settlement boundaries should be reviewed

- **Need to review settlement boundaries:** Representations indicated the need to review settlement boundaries, at various locations, to include recently permitted development and site allocations.

### Infrastructure should be prioritised

- **Prioritise infrastructure:** Policy 1 and 2 fail to ensure that delivery of infrastructure needs will be met by developers for the population of proposed new developments. Placing infrastructure first is critical given the strain existing infrastructure is under, such as waste water and transport network. Policy 1 as currently worded is not justified as it is not consistent with national policy and fails to provide assurance that the infrastructure required to support development will be provided by the development itself.

## Council responses

### Housing / employment growth and plan period

Following on from the outcome of the consultation in 2021, as part of the work undertaken to shape the Local Plan and supporting evidence, an updated Local Housing Need Assessment was completed<sup>52</sup>. This identified a need of approximately 36,740 homes (based on the Government's standard method calculation) over the period 2020 to 2038. The need figure of approximately 36,740 homes incorporates 11,283 dwellings as an uplift in addition to the 25,455 dwellings needed for the trend-based growth, equivalent to an increase of 44.3%. The 2022 Local Housing Needs report also concluded that there doesn't appear to be any justification for increasing the housing need figure as a consequence of the jobs growth. This work also updated the base date of the Plan from 2016 to 2020 and extended the plan horizon by two years to 2038. With regards the plan period, the Local Plan also recognises that a plan period does not preclude policies looking ahead beyond 2038. Strategic policies relating to the identification of Chippenham, Melksham and Trowbridge as longer-term broad locations for growth, and site allocations that may be constructed over a longer period do look ahead beyond 2038. In terms of information to help assist the examination:

- Further information explaining housing need will be provided within a topic paper prepared to assist the examination process.

<sup>52</sup> [Wiltshire Local Housing Needs Assessment Update, Volume one, Establishing Local Housing Need](#), ORS (May 2022)



## Main issues: Policy 1 (Settlement Strategy) and policy 2 (Delivery Strategy)

The Local Plan provides for 160 ha of employment land. This level of growth is aspirational and intends to provide choice and flexibility across Wiltshire. It is clear from the Council's Employment Land Review (ELR) <sup>53</sup> that the allocations of employment land within the Local Plan, combined with the regeneration of existing employment sites will help meet the projected demand which falls within a range of 95ha to 120ha and this has been factored into the overall housing needs assessment.

### Housing delivery, land supply and constrained settlement

The Local Plan contains several development proposals for residential development to meet these needs whilst ensuring the delivery of an appropriate mix of types, sizes and tenures, particularly to address affordable housing needs. This ensures a continuous supply of housing over the Plan period that is aligned to job growth, the delivery of necessary infrastructure whilst also recognising the constraints to growth in some locations. A Housing Delivery Paper <sup>54</sup> was prepared for the Regulation 19 consultation outlining how the delivery of site allocations within the Local Plan alongside other sources of delivery contribute to housing land supply. In terms of information to help assist the examination:

- Further information explaining housing delivery and land supply will be provided within a topic paper prepared to assist the examination process. This will include an update the 2022 base date relating to housing data in the Local Plan and associated evidence base. This will provide a 1 April 2023 position in line with the council's latest published housing land supply statement.

In terms of delivery, Policy 2 of the Local Plan proposes an additional 36,740 homes over the plan period 2020 to 2038 stepped in three phase with the Local Plan identifying a land supply for approximately 35,965 dwellings. Housing requirements are stepped to reflect scales of growth that can be achieved whilst conserving and enhancing the natural, historic and built environments. They take account of circumstances which largely arise in the Salisbury Area, where these factors limit opportunities for development. In the early part of the Plan period, to allow time both to investigate the need and location for a new community in the Salisbury Housing Market Area, and to set in motion measures to reverse the effects of pollution in the River Avon Special Area of Conservation, house building rates will be lower than what will be possible in later years <sup>55</sup>.

The housing delivery paper equally explains how the site selection methodology demonstrated the particular sensitivity of certain 'constrained settlements' and how growth at these settlements was moderated factoring in a forecast contribution of homes built on small sites of less than ten dwellings to provide added protection in the context of the constraints at these settlements. This is balanced at other less constrained settlements where there is a greater emphasis on growth with a more generous supply of land for housing development that helps to ensure that new homes are provided across the County at a sufficient scale and rate. The combined total of new dwellings at these other less constrained settlements provides a contingency that supplements identified land supply.

<sup>53</sup> [Wiltshire Employment Land Review Update, Final Report](#), Hardisty Jones Associates (September 2023)

<sup>54</sup> [Wiltshire Local Plan Housing Delivery Paper incl. trajectories](#), Wiltshire Council (September 2023)

<sup>55</sup> This is explained further in the Salisbury Area Strategy in Chapter 4 of the Local Plan

## Main issues: Policy 1 (Settlement Strategy) and policy 2 (Delivery Strategy)

Estimates for the number of homes delivered from small sites of less than ten dwellings and from neighbourhood planning are deliberately conservative. The contribution from small sites of less than ten dwellings derives solely from an estimate for the total from constrained settlements only (930 dwellings). The contribution likely from other main settlements, provides an additional number that by itself ensures overall needs will be met.

### Distribution of growth

In summary, the total requirement (36,740) was first distributed between the four housing markets areas (HMAs) that sub-divide the County with these totals then being distributed to provide scales of growth within the HMAs for each of their main settlements and the rural area. The distribution reflects how constraints and prospects for growth vary around the County in accordance with evidence gathered in the formulation of the spatial strategy. An brief overview of the process is provided below.

One key objective of the 2017 Strategic Housing Market Assessment<sup>56</sup> (prepared jointly with Swindon Borough Council) was to identify and define functional HMAs covered by the two local authorities and the Volume one document<sup>57</sup> set out the evidence-based approach taken to establishing the most appropriate HMAs for Swindon and Wiltshire and the surrounding areas. Following further work undertaken in 2019<sup>58</sup> and considering consultation feedback in 2021<sup>59</sup>, the HMAs were refined and finalised.

These HMAs, areas within which most of the local population both live and work, are the building block for the spatial strategy that ensures new homes align to areas of common household activity and their mutual needs. The Revised Spatial Strategy<sup>60</sup> explains how the overall housing need figure was then divided between these four HMAs using the most up-to-date population estimates of net migration alongside other factors, more detail of which can be found within the 2022 Local Housing Needs Assessment. The process of arriving at a revised spatial strategy, distributing growth around the county, was an iterative one involving processes informed by several factors, consultation and a range of evidence with sustainability appraisal<sup>61</sup> playing central role in comparing alternatives and identifying each one's likely significant effects.

<sup>56</sup> [Swindon and Wiltshire Strategic Housing Market Assessment Report of Findings](#), Opinion Research Services (2017)

<sup>57</sup> [Swindon and Wiltshire Strategic Housing Market Assessment Volume one Defining the Housing Market Areas](#), Opinion Research Services (2017)

<sup>58</sup> [Swindon Borough Council & Wiltshire Council Local Housing Needs Assessment 2019](#), Report of Findings, Opinion Research Services (2019)

<sup>59</sup> [Wiltshire Local Housing Needs Assessment Update, Volume One Establishing Local Housing Need](#), Opinion Research (May 2022)

<sup>60</sup> [Wiltshire Local Plan Revised Spatial Strategy](#), Wiltshire Council (2023)

<sup>61</sup> Chapter 4 of Wiltshire Local Plan Review Sustainability Appraisal (incorporating Strategic Environmental Assessment), Wiltshire Council (September 2023) and Annexes 1.1 - 1.4 outline the assessment of alternative development strategies for the four housing market areas

## Main issues: Policy 1 (Settlement Strategy) and policy 2 (Delivery Strategy)

In terms of the process, initially the Council developed and tested alternative development strategies as documented in a series of reports<sup>62</sup>. These alternative development strategies were then assessed, including via sustainability appraisal<sup>63</sup>. At this early stage in plan preparation, they were compared using a range of housing needs from a lower scale using the Standard Method to a higher one that, at the time, predicted a need for more homes to match economic growth<sup>64</sup>.

As part of the 2021 Regulation 18 consultation comments were then invited on the Emerging Spatial Strategy<sup>65</sup> which tested a scale of housing need greater than the standard method minimum. Following feedback from the 2021 consultation further work was commissioned<sup>66,67</sup> which form the main evidence sources input into the revised spatial strategy. This resulted in there no longer being a need for an uplift to the standard method of housing need to balance homes and forecast jobs alongside there being a shift in the distribution of housing need within the county<sup>68</sup>. Similarly the re-assessment of employment needs also forecast a reduction in demand but equally recorded a reduction in the supply of available land and premises.

Revisions to the emerging spatial strategy were assessed further before finalising a revised spatial strategy. For the Salisbury area it was necessary to test new alternative development strategies through sustainability appraisal due to 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 for these places. This testing 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 detail on how the revised spatial strategy was established can be found within the revised spatial strategy paper<sup>69</sup>.

### Settlement strategy and settlement boundaries

The strategy upon which the Local Plan is premised remains the same as that which underpinned the Wiltshire Core Strategy. Therefore, in considering options for bringing forward land to meet the development needs of the county over the period 2020 to 2038 the primary focus for the delivery of strategic housing and employment sites remains centred on Wiltshire's Main Settlements. The Main Settlements are the Principal Settlements and the Market Towns.

<sup>62</sup> [Formulating Alternative Development Strategies: Chippenham Housing Market Area](#), Wiltshire Council (January 2021); [Formulating Alternative Development Strategies: Salisbury Housing Market Area](#), Wiltshire Council (January 2021); [Formulating Alternative Development Strategies: Swindon Housing Market Area](#), Wiltshire Council (January 2021); [Formulating Alternative Development Strategies: Trowbridge Housing Market Area](#), Wiltshire Council (January 2021)

<sup>63</sup> [Wiltshire Local Plan: Interim Sustainability Appraisal Annex I – Assessment of Alternative Development Strategies for the four Housing Market Areas](#), Wiltshire Council (January 2021)

<sup>64</sup> [Swindon Borough Council & Wiltshire Council Local Housing Needs Assessment 2019](#), Report of Findings, Opinion Research Services (2019)

<sup>65</sup> [Wiltshire Local Plan Review, Emerging Spatial Strategy](#), Wiltshire Council (January 2021)

<sup>66</sup> [Wiltshire Local Housing Needs Assessment Update, Volume One Establishing Local Housing Need](#), Opinion Research (May 2022)

<sup>67</sup> [Wiltshire Employment Land Review Update](#), Hardisty Jones Associates (September 2023)

<sup>68</sup> Housing needs were lower in Chippenham and Trowbridge housing market area and higher in Salisbury and Swindon

<sup>69</sup> [Wiltshire Local Plan Revised Spatial Strategy](#), Wiltshire Council (September 2023)

## Main issues: Policy 1 (Settlement Strategy) and policy 2 (Delivery Strategy)

The Settlement Strategy, at Policy 1, sets the basis for how sustainable development is defined and applied within Wiltshire. It identifies the different tiers of settlements based on their role and function, and how they relate to their wider hinterland, namely Principal Settlements, Market Towns, Local Service Centres, Large Villages and, Small Villages. Any land beyond built-up areas is countryside. 'Settlement boundaries' generally delineate the extent of urban areas typically reflecting what has been built. Settlement boundaries will continue to be amended and kept up to date, as and when needed during the Plan period, as development takes place and allocations are built out on the edge of settlements. Boundary lines are defined using an established methodology, which is included as Appendix B to the Local Plan. Amendments may be made by the council to reflect changes brought about through the neighbourhood planning process.

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. The Revised Spatial Strategy paper <sup>70</sup> sets out how different strategies were tested to distribute growth around the county.

### Rural housing and neighbourhood plans

Concerns raised regarding the overall distribution of growth included criticisms that the strategy does not adequately set out a role for rural communities, for instance not allocating land for development at Local Service Centres and Large Villages, alongside a perceived over-reliance on neighbourhood plans to deliver growth. The Local Plan provides direction in terms of the role that rural communities will play in delivering growth over the Plan period. These matters are set in the Local Plan and its evidence and include figures for anticipated housing delivery in the rural areas of the Housing Market Areas, as well as designated neighbourhood areas.

The Revised Spatial Strategy identifies the rural parts of Wiltshire outside of the main settlements (excluding the new community within policy 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 generally better served by access to jobs, services, and facilities than Small Villages and more rural areas. It is important that rural communities can grow in a proportionate way to help sustain them.

The Local Plan fulfils the duty to provide housing requirements to inform the development of neighbourhood plans. The NPPF makes clear that Local Plan neighbourhood area requirements must reflect the overall strategy for the pattern and scale of development. In this context, the Local Plan provides rural requirements for the larger rural settlements that have a more prominent role within the settlement strategy – i.e. Local Service Centres and Large Villages that perform an important function of providing local services and facilities, and often serve a wider rural hinterland. Neighbourhood area housing requirements are therefore set at a scale of growth according to the Local Service Centres and Large Villages that lie within them.

Site allocations in the rural areas will generally be carried out by neighbourhood plans. Where this is not the case, it may be necessary for the Council to allocate sites at a later stage during the plan period. This may be achieved by a review of the Wiltshire Housing Site Allocations Plan. Growth at the rural settlements may also come forward through other exceptions policies, such as rural exceptions sites.

<sup>70</sup> [Wiltshire Local Plan Revised Spatial Strategy](#), Wiltshire Council (September 2023)

## Main issues: Policy 1 (Settlement Strategy) and policy 2 (Delivery Strategy)

In terms of contributing to land supply, plan preparation has taken a pragmatic approach to how Neighbourhood plans will act as a source for new homes that contributes to land supply. As outlined within the Housing Delivery Paper <sup>71</sup>, where a neighbourhood plan is being prepared or reviewed for a main settlement alongside the Local Plan and where it is established that they intend to allocate sites for new homes, then this is taken account of in contributing to meeting the scale of growth when selecting sites for the Local Plan. However when forecasting and managing housing land supply, although possible to forecast contributions from these neighbourhood plans, emerging site allocations are not included. So, for instance, they are not an element of the housing land supply unless and until a neighbourhood plan is made and there is a site allocation that is part of the development plan.

For rural areas, a significant proportion of new homes are built in the rural area, the majority at Local Service Centres and Large Villages. As a source of housing land supply, an estimate is made of how many homes will be built over the plan period based on past performance, informed by the revised spatial strategy. Levels are formulated as part of revising the spatial strategy since they take account of forecast housing need for each Housing Market Area and are informed by data on past completion rates, which is evidence collected as a part of preparing Housing Land Supply Statements.

### Rural housing and neighbourhood plans methodology

Following the 2021 consultation the methodology for distributing housing to Local Service Centres and Large Villages was amended and simplified. The methodology takes into account factors such as the size of settlements, recent growth, their environmental constraints, and capacity of primary schools and health facilities. The Rural Housing Requirements Paper <sup>72</sup> sets out the methodology that establishes the rural housing requirements for Local Service Centres and Large Villages. The methodology to establish neighbourhood planning requirements for Wiltshire's more urban neighbourhood areas, i.e. those that contain a Principal Settlement or Market Town, is set out within the separate *Planning for...* papers (published as part of the Regulation 19 consultation) for each of those settlements.

As explained in the Rural Housing Requirements paper, consideration of healthcare and education capacity reflects a point in time, and it is expected that through the preparation of neighbourhood plans these factors will be re-examined to obtain an up to date understanding of the present situation. Further evidence gathering to support neighbourhood plans, such as Local Housing Needs Surveys, will also require consideration. As such the Local Plan rural requirements are indicative and should be read in the context of the wider evidence base prepared to support neighbourhood plans. This allows for neighbourhood planning groups to plan for more than the Local Plan requirement where this is locally desired, and where there is clear evidence to support this. This includes at Small Villages where there are no Local Plan requirements, but evidence gathered by neighbourhood planning groups may support a limited scale of growth.

The Local Plan rural housing methodology factors in commitments and completions that have taken place at the Local Service Centres and Large Villages since the beginning of the Local Plan period (2020), to leave a residual requirement over the remaining plan period. This enables windfall development to be accounted for. To ensure that the submission version of the Local Plan reflects an up to date position in respect of completions and commitments, these numbers have been updated to reflect a base date of April 2023, which can be found within the latest Housing Land Supply Statement<sup>73</sup>.

<sup>71</sup> [Wiltshire Local Plan Housing Delivery Paper incl. trajectories](#), Wiltshire Council (September 2023)

<sup>72</sup> [Rural Housing Requirements](#), Wiltshire Council (September 2023)

## Main issues: Policy 3 (Reserve sites for housing and broad locations for growth)

Table 3.18 Local plan Policy 3 (Reserve sites for housing and broad locations for growth) main issues and Council response

Main issues: Policy 3 (Reserve sites for housing and broad locations for growth)
<p><b>Not effective to meet housing requirements and maintain housing land supply</b></p> <ul style="list-style-type: none"> <li>• <b>Cannot be relied upon to meet housing need:</b> Reliance on broad locations for growth and reserve sites to meet housing need is not effective, justified or sound. There is no certainty or detail provided in terms of delivery. The housing requirement should be higher and a realistic land supply should be set out to meet housing need. Broad locations for growth and reserve sites do not represent an appropriate tool for delivering housing. There is a lack of clarity and precision on the role of broad locations for growth.</li> <li>• <b>Allocate more land for development:</b> It is unclear why reserve sites cannot be allocations to assist in meeting the housing need at constrained settlements (some arguing they should be allocations). Housing land supply should instead be supplemented by additional allocations with reserve sites then possibly identified on a sequential basis. There could and should be reserve sites at more locations to provide the contingency they are intended to provide, alongside more housing allocations to meet housing needs (some arguing these could be provided at less constrained settlements).</li> <li>• <b>Housing land supply calculations:</b> Including reserve sites within the housing land supply calculations but not including them as allocations is not an effective strategy. The reserve sites proposed do not satisfy the housing needs and do not provide sufficient contingency to maintain housing land supply.</li> </ul>
<p><b>No trigger</b></p> <ul style="list-style-type: none"> <li>• <b>No trigger:</b> There isn't a clear trigger to try and address any housing supply shortfall. Undertake housing monitoring at both a total county wide area and through an area by area approach.</li> </ul>
<p><b>Omissions</b></p> <ul style="list-style-type: none"> <li>• <b>Omission sites submitted:</b> Representations identified a number of sites that should be considered to meet housing need at both urban and rural locations around the county. This also included suggestions that a broad location for growth / allocations should have been considered to the West of Swindon, a new settlement at other locations (e.g., Kemble), a growth area at Hullavington and so on.</li> </ul>
Council response
<p><b>Meeting housing need and policy clarity</b></p>

73 [Housing Land Supply Statement, Base Date: April 2023](#), Wiltshire Council (June 2024); [\(Appendix\)](#)

### Main issues: Policy 3 (Reserve sites for housing and broad locations for growth)

The Local Plan identifies Chippenham, Melksham and Trowbridge as settlements which should be strategically planned for in the longer-term. These are referred to as 'broad locations for growth', where additional significant urban extensions should be identified towards the end of the Plan period. This allows for a lengthy lead into coordinating major infrastructure and giving certainty to where future growth will take place. Site specific policies, following further detailed work, in future development plan documents will provide further detail. These additional urban extensions, as introduced within Policy 3 (Reserve sites for housing and broad locations for growth) provide additional assurance that land supply is secure and offers flexibility over the medium term to adjust supply to meet higher scales of growth should evidence shift or supply needs to be supplemented. These additional urban extensions are therefore intended to be delivered toward the end of the plan period and beyond its end date. In terms of housing delivery, they provide assurance that housing land supply will have significant additions toward the end of the plan period and beyond. Development will only be permitted under the auspices of a new or revised development plan document.

The issues raised regarding a perceived lack of clarity in terms of the location and/or role of the proposed broad locations for growth and reserve sites have been noted. In identifying broad locations for growth, the Plan seeks to strike a balance between setting out an intention for future growth beyond the Plan period, while at the same time recognising that evidence will need to be developed to justify and refine proposals. Clearly this will be a matter for the examination process, but there may be scope to tighten the wording of draft Policy 3, if the Inspector feels this is necessary, to address the points raised without substantially altering its intent.

Reserve sites will only be released for development should for any reason other allocations be delayed or the contribution from small sites fail to materialise and they are required to maintain the land supply requirements set by national policy<sup>74</sup>. Reserve sites, like site allocations, are a result of the site selection process and are identified in three locations that collectively may provide for 375 homes. Policy 3 outlines the criteria when a reserve site will be supported for appropriate proposals. This approach provides a safeguard to allow the council to bring forward new 'plan led' sites relatively easily and to help guard against a situation where developers seek to promote speculative greenfield sites. It is not envisaged that reserve sites will be drawn upon because of the way supply will be supplemented from other sources. It is nevertheless worthwhile retaining a contingency as part of the Plan to avoid 'planning by appeal' and the considerable uncertainty that involves.

<sup>74</sup> The Council monitors housing land supply and publishes an annual Housing Land Supply Statement recording construction, planning permission and the supply of specific deliverable sites. It takes account of the results of the Housing Delivery Test

## Main issues: Policy 4 (Climate change strategy)

Table 3.19 Local plan Policy 4 (Climate change strategy) main issues and Council response

Main issues: Policy 4 (Climate change strategy)
<p><b>Policy (and plan more widely) not sufficient / not reflective of climate change need for action</b></p> <ul style="list-style-type: none"> <li>• <b>Policy insufficient:</b> Wiltshire is not treating climate change and the carbon emissions policy area with the seriousness that it deserves. There are actions the policy could and should take to go further to help tackle climate change with the development proposed within the local plan and associated other policies going against the intentions / impacting the deliverability of Policy 4.</li> <li>• <b>Local Plan insufficient:</b> Wiltshire is not treating climate change and the carbon emissions policy area with the seriousness that it deserves. Each policy should have carbon reduction embedded within and as a thread throughout the draft Plan as opposed to a policy on such a matter in isolation. This was in relation to a range of policies within the Local Plan (e.g., Policy 5 should set out the requirements for developers to consider climate impacts of infrastructure).</li> <li>• <b>No targets, monitoring and evidence outdated:</b> There is a lack of explicit targets, no active monitoring of the performance against those targets and a reliance on insufficient and out of date evidence to understand the carbon footprint of the proposed development / understand the actions required in relation to a changing climate.</li> </ul>
<p><b>Policy wording ambiguity / confusion</b></p> <ul style="list-style-type: none"> <li>• <b>Wording ambiguity:</b> There are terms within the policy that needs to be clearly defined to enable the successful implementation of the policy, for instance 'carbon neutrality' and 'circular economy' with other phrases such as overheating not being clearly defined.</li> <li>• <b>Sustainable Energy Statement requirement:</b> The policy requires the preparation of a Sustainable Energy Statement for all new development. Further clarity with regards the requirements of this document is needed, particularly in relation to how embodied carbon is to be taken into account and the need to distinguish between the requirements for major and minor developments. Clarification on the types of a development where a Sustainable Energy Statement would not be necessary is also required.</li> <li>• <b>Policy cross referencing is contradictory and confusing:</b> Reference within the policy to other LPR policies is considered an unnecessary duplication and may lead to confusion or contradiction which does not accord with the NPPF requirements (other representors argued to the contrary). Representors also outlined that any amendments to referenced to development management policies must be reflected within the policy (policy 4).</li> </ul>
<p><b>Policy goes too far in its requirements</b></p> <ul style="list-style-type: none"> <li>• <b>Lack of flexibility / deliverability challenge:</b> The policy does not allow for flexibility whereby it may not be possibly / technically feasible for development to comply with the requirements within the policy. The requirements within the policy will add additional costs that may impact upon the deliverability of small sites and housing delivery.</li> </ul>
<p><b>Council response</b></p>



### Main issues: Policy 4 (Climate change strategy)

The Local Plan must contain policies designed to secure that the development and use of land in the area contribute to the mitigation of, and adaption to, climate change in line with Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 (as amended).

Climate change is a theme running throughout the Local Plan. 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 local Plan have been considered and designed in the light of the NPPF 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.

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.

## Main issues: Policy 5 (Infrastructure delivery)

Table 3.20 Local plan Policy 5 (Infrastructure delivery) main issues and Council response

Main issues: Policy 5 (Infrastructure delivery)
<p><b>Clarity of delivery responsibilities and funding</b></p> <ul style="list-style-type: none"><li>• <b>Need for clarity of funding mechanisms and responsibilities:</b> In respect of delivery responsibilities the policy identifies the various mechanisms that will be used to secure infrastructure delivery, including the direct provision of services and facilities (as reflected in the Infrastructure Delivery Plan), the use of planning conditions and S106 obligations and the use of CIL. It is essential that the plan is clear in respect of different funding and delivery mechanisms that will be utilised to deliver necessary strategic and local infrastructure and that there is no duplication between regimes or ambiguity that will hinder the effectiveness of the plan and the viable delivery of necessary development. The policy requires joint working with other authorities to address wider strategic infrastructure requirements where they arise. The policy wording is ambiguous in respect of who is responsible and the extent of joint working.</li><li>• <b>CIL significance and clarity over planning obligation tests:</b> Policy 5 should recognise the significance of CIL (or any new infrastructure levy) in meeting infrastructure needs from new development. The policy should also clarify and include the planning obligation tests within the policy.</li></ul>
<p><b>Insufficient funding and policy not effective at infrastructure delivery</b></p> <ul style="list-style-type: none"><li>• <b>Policy not effective to deliver infrastructure:</b> Wiltshire Council have not properly scoped projects nor have they put into place sufficient requirements for S106 contributions to achieve the aims of this policy. The policy, as an iteration of the previous policy, is proven to be not effective (e.g., reference to Salisbury transport network).</li><li>• <b>Specific infrastructure provision shortfall:</b> Representors suggested the plan was unsound on a range of specific shortfalls (sometimes site a place specific, but applicable to the effectiveness of Policy 5) including; insufficient evidence, funding and policy provision to ensure delivery of sustainable transport options; insufficient funding and delivery of healthcare facilities with the NHS specifically outlining a preference for a more consistent approach to identifying the broad locations and type of healthcare infrastructure required to support the proposed level of growth and to inform sufficient contributions; insufficient assessment of the ability to deliver required education infrastructure / contributions; the undeliverability of some required transport schemes within the Local Plan period (for instance A36 increased capacity work in Salisbury and the Harnham Gyatory).</li><li>• <b>Long term strategic infrastructure delivery:</b> The Local Plan fails to recognise the need for a longer-term time horizon to plan strategically for funding and delivery of new infrastructure that is strategic in nature. This approach is unsound and will not be effective and does not meet the requirement under the Duty to Cooperate (with specific reference to Swindon and the Swindon HMA). Policy amendments are required to ensure sufficient consideration is given to ensure strategic cross boundary infrastructure is effectively considered and delivered.</li></ul>
<p><b>Development viability and viability testing</b></p> <ul style="list-style-type: none"><li>• <b>Unusual and unjustified approach to viability testing:</b> The process for viability testing identified in policy 5 is unusual and unnecessarily cumbersome and not supported by other policy or guidance as it requires that viability testing would be undertaken by a jointly appointed third party. The usual approach to development viability as part of the planning process would be for the applicant to prepare a viability assessment (based on relating Planning Practice</li></ul>

## Main issues: Policy 5 (Infrastructure delivery)

Guidance and other standard inputs) and for this to be reviewed by the planning authority, with specialist third party support (funded by the applicant/developer) as appropriate. This approach should be allowed for by policy 5 as the industry standard approach to viability assessments with planning applications, the policy should be amended to allow for clarity and to be effective in this respect.

- **Post submission viability negotiations:** The wording does not allow for post-submission negotiations on viability matters. Up front information as part of an application is to be encouraged but it is not always possible to fully assess viability prior to submission. In many cases the full extent of obligations required will not be known until all consultation responses have been received, sufficient flexibility will need to be allowed for such decisions. There is no clarity on how the council will determine when the reduction of infrastructure funding reaches a point that renders a scheme unsustainable.
- **Policy criteria for demonstrably unviable development:** In relation to the consideration of whether reduced infrastructure funding would render a scheme unsustainable it is suggested it is not compliant with NPPF and PPG as site specific viability should be able to be considered on a case by case basis if viability has significantly changed since the whole plan viability assessment was undertaken. The case to re-evaluate viability at planning application stages needs to be on the basis of a clearly defined set of matters only and not a simple default position for renegotiating infrastructure requirements agreed to support a plan allocation at an earlier stage.
- **Policy ambiguity with regards reduced levels of infrastructure:** Policy 5 confirms in circumstances where a developer and LPA agree a development is unviable, the LPA will consider a reduced level of infrastructure. In such circumstances, essential infrastructure will be prioritised. It is noted viability is also a consideration within policy 76. It is unclear which policy outcome would be afforded a priority over the other, i.e. affordable housing over essential or place-shaping infrastructure. This in terms of paragraph 16(d) of the NPPF creates a lack of clarity and ambiguity. It is therefore inconsistent with national planning policy and as such is unsound.

### Supplementary Planning Document

- **Requirement for new Supplementary Planning Document:** The policy states Supplementary Planning Documents will provide more detail about its approach to securing developer contributions. The Supplementary Planning Documents are to be prepared, subject to consultation, to provide additional guidance on how a local plan policy will be interpreted. While it would be appropriate for the policy to state that a Supplementary Planning Documents will be prepared, it is contrary to national policy to link the policy to an existing Supplementary Planning Documents that relates to an earlier development plan document. There is a need to update this in parallel to the local plan.

### Essential and place-shaping infrastructure

- **Unsuitability of list of place-shaping infrastructure:** Representations voiced a variety of views with regards the suitability of these lists. This included; the need to include items not listed (or add / remove items from the essential infrastructure list); provide more clarity on the items that are currently very broad, clearly defined items are needed if this is to be used to prioritise contributions; essential infrastructure should reflect all legally binding duties such as biodiversity net gain; the need to more clearly define the term infrastructure itself and; the need to prioritise infrastructure that contributes to carbon reduction and tackling climate change.

### Viability assessment

### Main issues: Policy 5 (Infrastructure delivery)

- **Local Plan viability assessment of small sites:** Questionable that the plan is justified, effective and deliverable given the inadequate supporting viability assessments in terms of how the viability of delivering smaller sites has been assessed in the context of Policy 5. It is recognised that viability assessments need to consider the whole local plan context but the assessment of smaller sites is questionable. The assessment should consider a broader range of smaller sites (e.g. 0-5, 5-20, 20-50) and not treat a 6 unit scheme the same as a 49 unit scheme.
- **Local Plan viability assessment of key sites:** The Local Plan Viability Assessment (September 2023) notes in paragraph 3.3.2 that only key sites have been subject to viability testing. This means some sites that are required to deliver or provide contributions towards significant infrastructure items have not been viability assessed. This appears to provide an inadequate assessment of the adequacy and effectiveness of policy 5 in delivering the necessary and required infrastructure.
- **Local Plan viability assessment healthcare contributions:** Where financial contributions towards healthcare have been identified in the policy requirements for site-specific testing, the viability assessment does not include a specific allowance for contributions towards healthcare. Without explicit mention of required healthcare mitigation in the viability assessment, healthcare mitigation will compete with other planning obligations or be ignored entirely. Preference that the approach for healthcare facilities is similar to the education approach whereby a separate cost input for the required healthcare is included. This would ensure that healthcare mitigation is appropriately weighted when evaluating the potential planning obligation necessary.

### Infrastructure Delivery Plan

- **Clarity regarding source of funding:** Appendix 1v of the IDP does not distinguish within its identified sources of funding for infrastructure whether the developer contribution is via the S106 process or via CIL. Clarity is needed to ensure that the basis for seeking developer contributions is justified and also effective, in terms of delivering the infrastructure for which the contribution is sought. This is necessary to ensure that there is no duplications whereby planning obligations are sought for items which are already covered by CIL. Planning obligations should not be used to deliver projects identified in the infrastructure list which forms part of the CIL Funding Statement.
- **Infrastructure Delivery Plan healthcare:** Further detail in the IDP is necessary to provide clarity around the healthcare infrastructure required to support growth and ensure that both planning obligations and CIL effectively support and result in capital funding towards delivery of the required infrastructure from new housing development.

### Council response

#### Local Plan infrastructure provision, funding and delivery

Some representors raised concerns that the proposals set out in the Local Plan will only add to deficiencies in local infrastructure e.g. healthcare facilities. The Local Plan has been premised on an understanding of what infrastructure will be needed to support additional planned growth over the period to 2038. These matters are addressed in the Infrastructure Delivery Plan, draft Policy 5 (Securing infrastructure from new development), draft site allocations policies and the viability assessment.

## Main issues: Policy 5 (Infrastructure delivery)

Policy 5 is designed to be a comprehensive framework for infrastructure delivery. The policy outlines mechanisms for securing infrastructure, including the use of S106 contributions, Community Infrastructure Levy (CIL), and direct provision of services. The Infrastructure Delivery Plan (IDP) aims to ensure ensuring that projects are properly scoped and that sufficient S106 contributions are secured to meet the policy's aims. Policy 5 also includes provisions for joint working with neighbouring authorities, to address cross-boundary infrastructure needs. This collaborative approach ensures that strategic infrastructure is planned and delivered effectively, meeting the requirements under the Duty to Cooperate.

### Clarity of delivery sources and funding

Policy 5 identifies potential funding and delivery mechanisms and joint working requirements, and the Infrastructure Delivery Plan applies these to specific infrastructure projects. It is often the case that projects may be delivered through multiple funding sources. Avoiding being overly prescriptive at the Plan level, further detail on funding and delivery mechanisms and joint working responsibilities typically becomes available as the infrastructure delivery process progresses.

Policy 5 identifies CIL as a potential funding source for delivery infrastructure but the Local Plan does not repeat matters covered by national policy and legislation.

### Development viability and viability testing

Policy 5 ensures impartiality and transparency in viability testing by requiring a jointly appointed third party. The policy encourages upfront information to streamline the planning process and avoid delays. It allows for site-specific viability considerations, ensuring each development is assessed on its unique merits, consistent with national policy and guidance.

### Supplementary Planning Document

The Planning Obligations Supplementary Planning Document will be reviewed and updated in due course and in line with national policy and legislation.

### Essential and place-shaping infrastructure

The list of place-shaping infrastructure is designed to be comprehensive yet flexible, recognising that it is not exhaustive.

### Infrastructure Delivery Plan

The Infrastructure List, which is part of the annual Infrastructure Funding Statement, identifies those projects that the Council may fund through CIL, in whole or in part. However, changes to national CIL legislation in 2019 made it permissible to use both CIL and s106 to deliver the same infrastructure project. Projects that will be delivered through s106 must meet the tests set out in national policy. The Infrastructure Delivery Plan is periodically updated through an iterative process of dialogue with service providers when further information becomes available.

## Main issues: Area strategies explained and overall

- 3.21** The area strategy section of the Local Plan follows on from Section 3 and precedes the place specific area strategy sections of the Local Plan. Given the overlap with the first 5 policies of the Local Plan, and to provide context to any subsequent main issues raised in the place specific area strategy sections, the area strategy overarching main issues are described below. Where issues have been raised against this part of the plan / topic but have already been reflected in the main issues as illustrated against section 1-3, they have not been repeated below.

**Table 3.21 Local plan area strategies explained main issues and Council response**

Main issues: area strategies explained
<p><b>Housing Market Area (HMA) geographies and application challenged</b></p> <ul style="list-style-type: none"> <li>• <b>Geographies not justified:</b> Challenge was received with regards the geographies of the HMA and the justification behind this (e.g., Semington from Chippenham to Trowbridge).</li> <li>• <b>Challenge to HMAs as a basis for distribution of growth:</b> The HMAs do not have the status of administrative boundaries which much justify planning for a lower level of growth if there are overriding constraints in meeting the requirements within them. If it is considered appropriate to utilise a development strategy that considers each of the HMAs separately, this must be clearly and explicitly set out in the plan policies, form part of the Spatial Strategy and be linked to a monitoring framework. Growth should be directed in accordance with the settlement strategy. Constraints in meeting growth in one HMA, or a deficiency of delivery in one area should mean that consideration should be given to redirecting some of that HMA growth elsewhere since it is growth that is required overall. Such argument was sometimes accompanied by the suggestion higher levels of growth should be distributed to specific locations / HMAs.</li> </ul>
<p><b>Masterplan and concept plan approach unjustified / unnecessary</b></p> <ul style="list-style-type: none"> <li>• <b>Unjustified masterplan and concept plan requirements:</b> The requirement for masterplans in certain circumstances within the section on delivering allocated sites is unjustified, unnecessary, unclear and will delay the delivery of housing. It is important a flexible approach is adopted both in policy terms and to adherence to concept plans, should they be included within the Local Plan. Concept plans should only include sufficient detail to meet genuine and clearly identified policy objectives and should be purely indicative. Objection was lodged in many instances for the requirement to adhere to site concept plans within policy for the site allocations within the draft plan. They are illustrative and should not be treated as determinative given the high level assessment work that informed them. In some cases, the composition of concept plans were challenged.</li> </ul>
<p><b>Policy duplication within site allocation policies</b></p> <ul style="list-style-type: none"> <li>• <b>Unnecessary duplication between site allocation and development management policies:</b> Representors critiqued some of the policy requirements (e.g., ecological, heritage) outlining that these simply duplicated the intention of policies within section 5 of the plan (development movement policies) and subsequently such criteria were not necessary within site allocation policies. Similar critique was voiced with regards financial contributions to infrastructure given this duplicated the intention of policy 5 within the draft Plan.</li> </ul>

## Main issues: area strategies explained

### Council response

#### **Housing Market Areas and application of these**

Council responses in Table 3.17 cover strategic matters in relation to Housing Market Areas and how these were used to distribute growth.

#### **Masterplans and concept plans**

The Local Plan, in certain circumstances, requires planning applications to be informed by a masterplan. This should secure the principles and requirements established in the relevant policy. Where a masterplan is required, it is expected that once agreed, this will set out the parameters to inform the design, layout and delivery mechanisms for the site.

To inform the development of larger and more complex allocations, concept plans are provided. They show how the land uses proposed can be accommodated on site. Concept plans also show areas for infrastructure and what land would be left undeveloped, for instance, to help maintain the setting of a particular settlement, important views, access to the countryside or the setting and separate identity of villages in the wider landscape. This is intended to help guide and manage expectations amongst landowners and encourage collaboration to achieve the best possible form of development whilst conserving and enhancing the natural and historic environment. The principles of these should inform masterplans where required by policies. Concept plan show how a site may be developed, intended to illustrates one treatment of the site that considers mitigation requirements and the homes, other uses and infrastructure envisaged.

### 3.2.4 Main issues: Local Plan section 4 (Chippenham HMA)

**3.22** Presented below are the main issues raised by the representations with regards Local Plan section 4 focusing upon the strategy for the Chippenham HMA, namely:

- Strategy for the Chippenham HMA
- Chippenham principal settlement
- Calne market town
- Corsham market town
- Devizes market town
- Malmesbury market town
- Melksham market town

**3.23** Within the table for each place are the main issues raised for all policies associated with that place. For instance, the Chippenham principal settlement table will contain main issues for policy 6 (Chippenham principal settlement), policy 7 (land south of Chippenham and east of Showell farm) and policy 8 (Chippenham town centre).

**3.24** Where representations have presented issues as per those reported against sections 1-3 of the draft Plan, these have not been repeated against these place specific policies. However, in some instances further place specific detail may be provided. Please refer to the main issues presented against sections 1-3 of the draft Plan to understand these overarching plan wide matters.

**3.25** Given the overlap between the comments for the strategy for all the rural areas, these main issues have been presented in one table covering topics relevant to the strategy for all rural areas after the presentation of main issues for each HMA.

### Main issues: Strategy for the Chippenham HMA

**Table 3.22 Local plan strategy for the Chippenham HMA main issues and Council response**

Main issues: Strategy for the Chippenham HMA
Distribution of growth challenge



## Main issues: Strategy for the Chippenham HMA

- **Focus growth on Chippenham HMA:** Support focus for growth within Chippenham and Melksham with some suggesting the HMA lends itself (for instance Chippenham's link to strategic road network) to absorb growth from other constrained HMA's such as Salisbury.
- **Challenge to rural housing focus:** The rural area provides the second highest contribution to the housing supply within the HMA which is not consistent with a delivery strategy that aims to balance homes and jobs and to address the causes of climate change. Adjust to focus on main settlements.
- **Employment distribution challenge:** Representatives pointed out the strategic location of Chippenham (including junction 17) and Melksham to take growth. Similarly, it was criticised that employment growth in rural locations has been overlooked with opportunities such as Kemble not considered.
- **Change to distribution of growth:** At some point between Regulation 18 and 19, an internal, un-consulted strategic decision was made to reduce housing provision in the Chippenham HMA with a notable reduction in Melksham.

## Council response

### Distribution of growth

Further information, including Council responses, in Table 3.17 provides strategic context on the decisions made, process and evidence informing the level and distribution of growth alongside further information on growth in rural communities. The Planning for Chippenham<sup>75</sup>, Calne<sup>76</sup>, Corsham<sup>77</sup>, Devizes<sup>78</sup>, Malmesbury<sup>79</sup> and Melksham<sup>80</sup> documents provide place specific information including the context and challenges for each place alongside summaries relating to the key factors that have informed the distribution of growth for each settlement, summarising information from a variety of evidence sources informing these decisions.

Chippenham is a Principal Settlement and primary focus for future growth in the Chippenham Housing Market Area. There is a greater focus on growth and delivery than in previous plan periods, when there was a period of limited land availability; a consequence of which was to help fuel growth exceeding the plan intentions at other settlements nearby. Melksham, one of five market towns in the area is comparatively less constrained and its location on the A350 makes it attractive for business investment. Calne, similarly, is less constrained and both towns have experienced significant pressure in relation to housing in recent years than planned for, partly due to the slower delivery of housing at Chippenham.

<sup>75</sup> [Planning for Chippenham](#), Wiltshire Council (September 2023)

<sup>76</sup> [Planning for Calne](#), Wiltshire Council (September 2023)

<sup>77</sup> [Planning for Corsham](#), Wiltshire Council (September 2023)

<sup>78</sup> [Planning for Devizes](#), Wiltshire Council (September 2023)

<sup>79</sup> [Planning for Malmesbury](#), Wiltshire Council (September 2023)

<sup>80</sup> [Planning for Melksham](#), Wiltshire Council (September 2023)

### **Main issues: Strategy for the Chippenham HMA**

In terms of the other Market Towns in this HMA, Corsham, Devizes and Malmesbury have accommodated greater levels of house building than originally planned and these settlements are also environmentally more sensitive and more vulnerable to harm. They are constrained settlements because opportunities for outward expansion are more limited than others. Within these settlements, the scales of housing growth being proposed in the Plan are significantly lower than in the past.

## Main issues: Chippenham Principal Settlement

Table 3.23 Local plan Chippenham Principal Settlement main issues and Council response

Main issues: Chippenham Principal Settlement
<p><b>Chippenham housing numbers</b></p> <ul style="list-style-type: none"> <li>• <b>Too high:</b> Amount of growth above the residual requirement is not justified and will not be met by demand.</li> </ul>
<p><b>Omission sites and site selection process</b></p> <p>A number of omission sites were promoted, including:</p> <ul style="list-style-type: none"> <li>• Gate Farm, Rawlings Farm extension, Land West of Chippenham, Barrow Farm, Land West of Chippenham adjacent to A420, Land off Saltersford Lane, Hunters Moon parcel of land, Land North of Stanley Lane, East Chippenham, Land South of Showell Farm.</li> </ul> <p>These were, in part, accompanied by critique of the processes that had led to the sites not being allocated.</p>
<p><b>Site selection process</b></p> <ul style="list-style-type: none"> <li>• <b>East Chippenham preferred:</b> Site selection process shows land at east Chippenham should be the preferred option. Deliverability and availability issues are not accurate. Wiltshire Council has refused to use its land interests to facilitate development at east Chippenham as it has done for south Chippenham at the costs of sustainability for the town.</li> </ul>
<p><b>Place shaping priority 5: A4 to A350 road link (linked to policy 7)</b></p> <ul style="list-style-type: none"> <li>• <b>Reliance on and deliverability of road link challenged:</b> Without the link road it is difficult to see how growth could be accommodated. Reliance on a link which crosses several landownerships, includes a bridge and causes heritage impacts does not appear deliverable or viable. This could impact on site deliverability. Road is not costed in terms of the burden it will place on the delivery of the site. The withdrawal of external funding will impact the delivery of the road.</li> <li>• <b>Alternative:</b> There is an alternative western route via Redcliffe Homes land at Rowden Park (Chippenham Site Allocations Plan site 1) which would utilise existing road infrastructure. This would mean that there would be a reduction in length of new road needed and therefore cost.</li> <li>• <b>Absence of traffic modelling:</b> The policy requirement for this road is not supported by evidence. Specific traffic modelling hasn't been included for the proposed new road.</li> </ul>
<p><b>Policy 7: Land south of Chippenham and east of Showell farm</b></p> <ul style="list-style-type: none"> <li>• <b>Employment land not required:</b> The 15ha of employment land is not required or justified and should be replaced with more housing to boost supply. The employment land review identifies an oversupply within Chippenham.</li> </ul>

## Main issues: Chippenham Principal Settlement

- **Not most sustainable site:** This site did not score the most sustainably as part of the site selection process so it appears an unjustified allocation.
- **Delivery trajectory challenged:** Given the strategic nature of the site and infrastructure requirements the delivery trajectory is likely to be slow and may not be delivered within the plan period to 2038.
- **Flood risk:** Representors outlined concerns regarding the flood risk constraints and impacts of developing this site with the Environment Agency outlining the site should be removed until the sequential test is passed.
- **Site boundary:** The current Concept Plan includes both the Forest Farm complex and a small square of land fronting London Road that sits between the properties known as 'Gorley' and 'The Gables'. While it is within the gift of the Council to include those areas of land within the allocation, it should be noted that they are not within the control of any of the members of the Developer Consortium.
- **Land contamination:** The land north of the Sewage Works between the River Avon and Pewsham Way is historical former landfill site. Amend the policy to include within the mitigation measures a detailed land contamination assessment.
- **Expand allocation:** Representors pointed towards the sustainability and housing delivery benefits of allocating the larger allocation for 4000 homes.
- **Heritage impact:** Historic England outline a need to assess how the heritage assets might be affected and measures to ensure harm is minimised and benefits optimised. The National Trust added to these concerns with regards the potential for negative impacts upon Lacock.
- **County Park size:** River Avon Country Park should have a minimum area of extension to provide certainty within policy as per Natural England representation.

### Policy 8: Chippenham town centre

- **Wording challenge:** Representations challenged elements of the wording of policy 8, including outlining the opening of the policy as vague, a lack of reference to Chippenham's independent sector, lack of reference or use of evidence underpinning Chippenham Neighbourhood plan and support for inappropriate leisure uses.
- **Policy flexibility:** The policy anchor is ambiguous and does not allow flexibility in terms of deliverability and site layout.
- **Flood risk, sequential test:** Including residential uses will be an increase in vulnerability on the site. Unless the sequential test has been passed for this site, include this change in vulnerability in the policy. Either remove residential uses, delete the site or undertake a Level 2 SFRA.
- **Flood risk:** Radial weir gate project wording is required within the policy. Due to areas of this site being within flood zones 2 and 3, safe access and escape must be achieved.

### Infrastructure delivery plan

- **A4 / A350 road link:** The Infrastructure Delivery Plan does not provide a cost for the new road infrastructure to enable the viability to be tested and says it will be delivered entirely through developer contributions.

### Transport evidence

## Main issues: Chippenham Principal Settlement

- **A4 / A350 road link:** The transport evidence is also inadequate as the modelling undertaken retains the Eastern Distributor road, despite it no longer being part of the Pan Proposals, thus overselling the benefits of the southern distributor road.

## Council response

### Housing and employment

Further information, including Council responses, in Table 3.17 provides strategic context on the decisions made, process and evidence informing the level and distribution of growth. The Planning for Chippenham<sup>81</sup> document then provides place specific information including the context and challenges for Chippenham alongside information relating to the key factors that have informed the distribution of growth, summarising information from a variety of evidence sources that informed this decision. For Chippenham the proposed housing requirement for Policy 7 is 2525 homes, 435 homes higher than the residual figure of 2090 homes. This increase responds to Chippenham's role as a Principal Settlement and the comparatively less environmentally constrained nature of the town in the housing market area. Significant infrastructure will be required alongside this growth, including a new road.

### Infrastructure, constraints and site selection

The Planning for Chippenham document provides a host of information outlining how proposals for Chippenham have been established and informed by a variety of evidence sources. This includes outlining the challenges, constraints and local infrastructure considerations for Chippenham.

Appendix 2 of the Planning for Chippenham document also summarises the site selection process for Chippenham, outlining the findings from each stage. This includes detail on the pool of sites considered, the reasons for site removal via exclusionary criteria at stage 1 of site selection whilst also outlining the findings of stage 2 which further sifted sites based on a range of criteria. Following explanation as to whether any sites were then combined for further assessment, the document summarises the findings from Sustainability Appraisal and provides a table of sustainability appraisal key issues for sites assessed. Finally the findings of stage 4 are summarised. Stage 4 qualitatively examined the sites giving consideration to their capability of supporting the Local Plan's objectives for each community, in particular the identified 'Place Shaping Priorities' whilst also analysing the scale of growth that would be required to be drawn from the pool of the most sustainable site options to meet the identified housing and employment needs for the settlement.

The Planning for Chippenham document<sup>82</sup> explains that although East Chippenham (Site 1) performs strongly through the site selection process, at Stage 4 when assessed against the Place Shaping priorities there are considerable uncertainties surrounding the deliverability of the site and the ability to achieve timely road connections through the Rawlings Green site (to A350 north) including new River Bridge from Site 1 and road link south to the A4. It is now clear that Site 1 East Chippenham is not currently available.

### Road infrastructure

<sup>81</sup> [Planning for Chippenham](#), Wiltshire Council (September 2023)

<sup>82</sup> at Paragraph 61

## Main issues: Chippenham Principal Settlement

The proposed Policy 7 allocation has enabled a new approach to be taken to connecting the A4 and A350. As reported within Table 3.16 traffic modelling is being undertaken to consider in more detail the comments submitted to the consultation and the highway design and trigger points for a new road to connect the A4 with the A350.

The current allocation in the area<sup>83</sup> includes a requirement to facilitate road access to A4 in the future.

### **Policy 7: Land south of Chippenham and east of Showell farm**

A Statement of Common Ground (SOCG) is underway with Hallam Land, Gleasons, Gallaghers and Wiltshire Council (landowner) that will provide contextual information and focus on key issues relevant to the site. This will aim to provide commentary on any areas of disagreement as well as establish common ground on matters in principle. This will also contain housing trajectory information. To inform the examination process and assist the Inspector, SOCG will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector. Key topic areas this SOCG will aim to cover include infrastructure and mitigation requirements and delivery; Delivery Trajectory including Phasing and distribution between each developers land parcels; Masterplanning.

### **Policy 8: Chippenham town centre**

Chippenham is a Principal Settlement with an expanding urban area. The established town centre plays an important role and the purpose of Policy 8 is to help strengthen its role and function and secure its future vitality and viability. It updates Core Policy 9 in the Wiltshire Core Strategy.

Chippenham Neighbourhood Plan was made in July 2024 when it became part of the Wiltshire development plan. It contains several local policies relating to the town centre which will complement Policy 8.

<sup>83</sup> Policy CH1, South West Chippenham within the [Chippenham Site Allocations Plan](#), Wiltshire Council (May 2017)

## Main issues: Calne Market Town

Table 3.24 Local plan Calne Market Town main issues and Council response

Main issues: Calne Market Town
<p><b>Distribution of growth / Calne housing numbers</b></p> <ul style="list-style-type: none"><li>• <b>HMA strategy not effective:</b> The current strategy could lead to a significant housing shortfall across the wider HMA, particularly given the (over) reliance on the strategic housing delivery at Chippenham. A more effective strategy would be a dispersed spatial strategy allocating additional sites at the Market Towns in the HMA, including Calne.</li><li>• <b>Housing number should be higher:</b> As a market town that has potential for significant sustainable growth, Calne is well placed to accommodate further residential development and address Wiltshire's historic unmet housing need. The approach to provide a more balanced growth between housing and employment is not justified. The 'Planning for Calne' Paper demonstrates that the town has substantial capacity and available sites to accommodate additional housing in conjunction with the planned supply of employment land.</li></ul>
<p><b>Strategic infrastructure</b></p> <ul style="list-style-type: none"><li>• <b>Major infrastructure improvements:</b> The plan has concluded that opportunities for major infrastructure improvements at Calne to address matters related to congestion and air quality will not be resolved within this plan period. This runs counter to the NPPF (paragraph 22) which requires strategic policies to anticipate and respond to long-term opportunities, such as those arising from major infrastructure improvements. This appears contrary to other locations and proposed broad locations for growth. For instance, the opportunity to link the A4 to the A3102.</li></ul>
<p><b>Omission sites and site selection process</b></p> <p>A number of omission sites were promoted, including:</p> <ul style="list-style-type: none"><li>• SHELAA sites 1104a, 1104b (part of site 4), land South of Low Lane (part of site 4), Land at Quemerford (part of site 4), SHELAA site 3642 (part of site 4), Land south of Marden Farm (site 10), Land at Wenhill (site 7), Land north of Low Lane (site 3), Land off Spitfire Road (part of site 3).</li></ul> <p>These were, in part, accompanied by critique of the processes that had led to the sites not being allocated.</p>
<p><b>Site selection process</b></p> <ul style="list-style-type: none"><li>• <b>Amalgamation of sites:</b> Site 4, for instance, is an amalgamation of SHELAA sites 3642, 487, 1104a, 1104b and 1104c. No consideration was given to disaggregation of Site 4 and this raises doubt over the veracity of the determination processes. When an authority aggregates sites, it does so with a view to improving the sum of the parts. Where it becomes apparent that such a measure is ineffective or detrimental, in positive plan making terms, this should be reversed.</li></ul>
<p><b>Policy 10: Land off Spitfire road</b></p>

## Main issues: Calne Market Town

- **Sequential test / flood risk:** This site is affected by flood zones on the Abberd Brook and the site experiences localised flooding. If the sequential test has not been passed for this site, the Environment Agency have advised it should be removed from the allocations list.
- **Neighbouring land uses:** The list of neighbouring uses that need to be considered is inaccurate and should include waste, minerals and industrial uses.

### Policy 11: Land to the north of Spitfire road

- **Exclusion of employment land within concept plan:** The concept plan excludes an area of existing employment land within the central area of the concept plan. This excludes part of the proposed development of this site that is considered to form an opportunity to create holistic residential-led mixed use that utilises good placemaking principles and makes efficient use of land.
- **Self build:** There is no justification for including self build plots within the concept plan
- **Local centre and nursery:** The local centre / nursery would be better related to existing a proposed development to the north-east of Calne. There appears to be no justification for the inclusion of this within the site.
- **Neighbouring land uses:** The policy should be amended to more accurately reflect the nature of likely impacts from the neighbouring land uses associated with the waste and recycling facilities.

## Council response

### Housing and employment

Further information, including Council responses, in Table 3.17 provides strategic context on the decisions made, process and evidence informing the level and distribution of growth. The Planning for Calne<sup>84</sup> document then provides place specific information including the context and challenges for Calne alongside information relating to the key factors that have informed the distribution of growth, summarising information from a variety of evidence sources that informed this decision. For Calne the evidence suggests that further significant growth would not be appropriate for the town; this includes in combination with new road links that would, overall, not deliver clear positive benefits. A key consideration under-pinning the strategy for the town is more balanced growth between housing and employment, with investment in businesses, services for the local community and a stronger town centre.

### Infrastructure, constraints and site selection

The Planning for Calne document provides a host of information outlining how proposals for Calne have been established and informed by a variety of evidence sources. This includes outlining the challenges, constraints and local infrastructure considerations for Calne.

<sup>84</sup> [Planning for Calne](#), Wiltshire Council (September 2023)



## Main issues: Calne Market Town

Appendix 2 of the Planning for Calne document also summarises the site selection process for Calne, outlining the findings from each stage. This includes detail on the pool of sites considered, the reasons for site removal via exclusionary criteria at stage 1 of site selection whilst also outlining the findings of stage 2 which further sifted sites based on a range of criteria. Following explanation as to whether any sites were then combined for further assessment, the document summarises the findings from sustainability appraisal and provides a table of sustainability appraisal key issues for sites assessed. Finally the findings of stage 4 are summarised. Stage 4 qualitatively examined the sites giving consideration to their capability of supporting the Local Plan's objectives for each community, in particular the identified 'Place Shaping Priorities' whilst also analysing the scale of growth that would be required to be drawn from the pool of the most sustainable site options to meet the identified housing and employment needs for the settlement.

### **Policy 10: Land off Spitfire road**

A Statement of Common Ground (SOCG) is underway with Pegasus Group on behalf of Robert Hitchins Ltd that will provide contextual information and focus on key issues relevant to the site. This will aim to provide commentary on any areas of disagreement as well as establish common ground on matters in principle. This will also contain housing trajectory information. To inform the examination process and assist the Inspector, SOCGs will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector. Key topic areas this SOCG will aim to cover include the inclusion of land adjacent to the allocation alongside the policy requirements regarding mitigation / enhancements and infrastructure delivery.

### **Policy 11: Land to the north of Spitfire road**

A Statement of Common Ground (SOCG) is underway with Pegasus Group on behalf of Robert Hitchens Ltd and Turley on behalf of Castlewood Property Ventures Ltd that will provide contextual information and focus on key issues relevant to the site. This will aim to provide commentary on any areas of disagreement as well as establish common ground on matters in principle. This will also contain housing trajectory information. To inform the examination process and assist the Inspector, SOCGs will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector. Key topic areas this SOCG will aim to cover include include the need for a masterplan to be approved prior to the submission of a planning application, the provision of self build plots as shown on the concept plan, the proposed local centre and nursery and the exclusion of an area of existing employment land, as well as detailed comments on the concept plan and the development management history.

## Main issues: Corsham Market Town

Table 3.25 Local plan Corsham Market Town main issues and Council response

Main issues: Corsham Market Town
<p><b>Corsham housing / employment</b></p> <ul style="list-style-type: none"><li>• <b>Housing numbers should be higher:</b> The level of growth is too low to support or fund the provision of new infrastructure as listed within the priorities such as the new railway station or a new supermarket.</li><li>• <b>Constrained settlement:</b> Objection to the housing provision on the grounds it has been influenced by an unsound analysis of the constraints affecting the town.</li><li>• <b>Small site allowance:</b> Object to the reliance on small sites. Relying on unidentified small sites to provide over half of the residual requirement does not provide certainty of delivery and is not an effective approach.</li><li>• <b>Employment land need:</b> There is a high need for employment land in the area and it is an unjustified omission that the plan does not allocate land for employment uses.</li></ul>
<p><b>Reserve site</b></p> <p>The reserve site should be an allocation to boost the supply of homes and to maintain a housing land supply.</p>
<p><b>Omission sites and site selection process</b></p> <p>A number of omission sites were promoted, including:</p> <ul style="list-style-type: none"><li>• Land north of Bradford Road, Land north of Bath Road, Land at Brook Drive, Land to west Corsham (employment), RAF Rudloe Manor (brownfield site).</li></ul> <p>These were, in part, accompanied by critique of the processes that had led to the sites not being allocated.</p>
<p><b>Corsham green buffer</b></p> <p>Objection to the identification of the Corsham Green Buffer on the proposals Map which does not appear consistent with the plan contained within the Neighbourhood Plan.</p>
<p><b>Place shaping priorities</b></p>

## Main issues: Corsham Market Town

- **Underground mines as a constraint:** Underground mines are one of the principal constraints to development in Corsham. Within mineral safeguarding areas and areas licenced for extraction of minerals, the Local Plan should contain an explicit ban on development. This is supported by the British Geological Survey Report.
- **Bats SAC:** The Bath and Bradford on Avon Bats Special Area of Conservation (SAC) blanket approach is not fully justified and there is not sufficient evidence to justify the strategy. Development Strategies should maximise housing allocations on all edge of settlement locations before considering less sustainable strategies. There are mitigation measures and further information would be provided as part of a planning application. Natural England supported the policy stance, but recommend the need for policy to outline the need to protect and enhance important bat habitat.

### Policy 13: Land south of Dicketts road

- **Employment land:** The site should be allocated as an employment site to meet these needs and also because they would not need the significant improvements to infrastructure including the upgrade to the railway bridge, additional schools and surgeries or provision of easements.
- **Ecological connectivity:** Natural England recommend that the policy is strengthened to specifically require the retention of mature native trees including those within the small copse located in the centre of the allocation site.

## Council response

### Housing and employment

Further information, including Council responses, in Table 3.17 provides strategic context on the decisions made, process and evidence informing the level and distribution of growth alongside information relating to the term constrained settlement and the small site allowance. The Planning for Corsham document<sup>85</sup> then provides place specific information including the context and challenges for for Corsham alongside information relating to the key factors that have informed the distribution of growth for, summarising information from a variety of evidence sources that informed this decision. For Corsham this includes an explanation regarding the position for employment land and why no sites for employment have been allocated at Corsham. The Employment Land Review<sup>86</sup> concludes there is an indicative forecast demand for up to 7.4ha employment land at the town. There is demand for further employment land, preferably to the west of Corsham, near to the MOD site and the villages of Rudloe and Westwells. The made Corsham Neighbourhood Plan Policy BE3 supports expanding the business potential of West Corsham, in accordance with an identified need. However, constraints in the area restrict the land that may be considered for further employment uses including the Rural Green Buffer and Bats corridor. The Employment Land Review recognises that other settlements in the Functional Economic Market Area including Chippenham and Melksham could help meet this indicative need.

### Infrastructure, constraints and site selection

<sup>85</sup> [Planning for Corsham](#), Wiltshire Council (September 2023)

<sup>86</sup> [Wiltshire Employment Land Review Update. Final Report](#), Hardisty Jones Associates (September 2023)

## Main issues: Corsham Market Town

The Planning for Corsham document provides a host of information outlining how proposals have been established and informed by a variety of evidence sources. This includes outlining the challenges, constraints and local infrastructure considerations for Corsham.

Appendix 2 of the Planning for Corsham document also summarises the site selection process, outlining the findings from each stage. This includes detail on the pool of sites considered, the reasons for site removal via exclusionary criteria at stage 1 of site selection whilst also outlining the findings of stage 2 which further sifted sites based on a range of criteria. Following explanation as to whether any sites were then combined for further assessment, the document summarises the findings from Sustainability Appraisal and provides a table of sustainability appraisal key issues for sites assessed. Finally the findings of stage 4 are summarised. Stage 4 qualitatively examined the sites giving consideration to their capability of supporting the Local Plan's objectives for each community, in particular the identified 'Place Shaping Priorities' whilst also analysing the scale of growth that would be required to be drawn from the pool of the most sustainable site options to meet the identified housing and employment needs for the settlement.

### **Reserve site**

Further information, including Council response, in Table 3.18 provides context with regards the criteria for when a reserve site will be supported for appropriate proposals. Reserve sites, like site allocations, are a result of the site selection process with further information being available within the Planning for Corsham document, namely Appendix 2 that deals with site selection. The Council consider that a Statement of Common Ground (SOCG) is not considered necessary at this point in time.

### **Policy 13: Land south of Dicketts road**

The site contains two parcels of land each controlled by a different landowner. Statements of Common Ground (SOCG) for each parcel are underway with the relevant developer(s) / landowner(s) that will provide contextual information and focus on key issues relevant to the site. These will aim to provide commentary on any areas of disagreement as well as establish common ground on matters in principle. These will also contain housing trajectory information. To inform the examination process and assist the Inspector, SOCG will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector. Key topic areas these SOCG will aim to cover include the delivery of the proposals set out in Policy 13 including the infrastructure and mitigation requirements and the delivery trajectory.

## Main issues: Devizes Market Town

Table 3.26 Local plan Devizes Market Town main issues and Council response

Main issues: Devizes Market Town
<p><b>Devizes housing numbers</b></p> <ul style="list-style-type: none"><li>• <b>Housing numbers should be higher:</b> Comments eluded to the need for a higher housing number at Devizes and that the lower figure is not justified or reflective of the needs for the market town. This is required to ensure there is a sustainable long term strategy for the town.</li><li>• <b>Reliance on the neighbourhood plan and small sites:</b> There is too much reliance in the housing numbers for Devizes on small sites and allocations in the neighbourhood plan.</li><li>• <b>Devizes is not constrained:</b> None of the environmental constraints identified at Devizes preclude the principle of residential development. Constraints in Devizes should not stop development coming forward but ensure sustainable development occurs in the right location so it has less landscape and transport impact.</li></ul>
<p><b>Omission sites and site selection process</b></p> <p>A number of omission sites were promoted, including:</p> <ul style="list-style-type: none"><li>• Land adjoining Lay Wood (part SHELAA 662), Land East of Devizes (sites 3,4 and 6 in the site selection process), Land North East of Roundway Park (site 8 in the site selection paper), Land north east of Devizes at Coate Road, Land west of Devizes (SHELAA site 3115).</li></ul> <p>These were, in part, accompanied by critique of the processes that had led to the sites not being allocated.</p>
<p><b>Devizes Parkway Station</b></p> <ul style="list-style-type: none"><li>• <b>Devizes Parkway Station:</b> Land will need to be accommodated for and safeguarded within the Devizes area for the Devizes Parkway Station. The safeguarded land will need to be included in the local plan policy documents should the station come forward.</li></ul>
<p><b>Place shaping priority</b></p> <ul style="list-style-type: none"><li>• <b>Reduce emphasis on tourism led development:</b> The wording of criterion 4 should be amended to reduce the importance of tourism development as part of town centre regeneration. The wording 'tourism-led' implies tourism uses shall be the primary development associated with the town centre regeneration.</li></ul>
<p><b>Policy 15: Devizes Wharf, Assize Court and Wadworth Brewery</b></p> <ul style="list-style-type: none"><li>• <b>Residential development amount incorrect:</b> The extent of residential development within the wharf area currently states 100 dwellings. This should be increased to 150 dwellings.</li></ul>

## Main issues: Devizes Market Town

- **Over prescriptive to require the three wharf areas to be developed in combination:** It is unreasonable to delay delivery because other sites are not yet able to be brought forward. The delivery of the Wadworth site could act as a catalyst for the wharf.
- **Masterplanning study should not be relied on:** It is in draft format. This is the first time the public have had an opportunity to comment on it. It is incomplete evidence and should not inform Policy 15. The land uses prescribed within the study do not reflect the only sustainable approach to the redevelopment of the area.

## Council response

### Housing and employment

Further information, including Council responses, in Table 3.17 provides strategic context on the decisions made, process and evidence informing the level and distribution of growth. The Planning for Devizes<sup>87</sup> document then provides place specific information including the context and challenges for Devizes alongside information relating to the key factors that have informed the distribution of growth, summarising information from a variety of evidence sources that informed this decision. For Devizes outward expansion of the settlement is constrained by steep topography, the need to conserve and enhance the town's landscape setting, and the qualities of the National Landscape. Rates of house building have exceeded those previously planned for and rates of growth are substantially reduced. Existing land supply for housing including recent approval of Land at Coate Road for 200 homes mean there is no need to allocate further greenfield land or include a reserve site for housing in this Plan. Housing land is expected to be identified for development in the Neighbourhood Plan and, along with small sites of less than 10 dwellings, this will meet planned scales of growth.

### Infrastructure, constraints and site selection

The Planning for Devizes document provides a host of information outlining how proposals for Devizes have been established and informed by a variety of evidence sources. This includes outlining the challenges, constraints and local infrastructure considerations for Devizes.

Appendix 2 of the Planning for Devizes document also summarises the site selection process for Devizes, outlining the findings from each stage. This includes detail on the pool of sites considered, the reasons for site removal via exclusionary criteria at stage 1 of site selection whilst also outlining the findings of stage 2 which further sifted sites based on a range of criteria. Following explanation as to whether any sites were then combined for further assessment, the document summarises the findings from sustainability appraisal and provides a table of sustainability appraisal key issues for sites assessed. Finally the findings of stage 4 are summarised. Stage 4 qualitatively examined the sites giving consideration to their capability of supporting the Local Plan's objectives for each community, in particular the identified 'Place Shaping Priorities' whilst also analysing the scale of growth that would be required to be drawn from the pool of the most sustainable site options to meet the identified housing and employment needs for the settlement.

### Devizes Parkway Station

<sup>87</sup> Planning for Devizes, Wiltshire Council (September 2023)

## Main issues: Devizes Market Town

Support for a Devizes Parkway Station is provided in Policy 14 Devizes Market Town and Policy 75 Strategic Transport Network of the Local Plan. The proposals for the railway station are at an early stage and there is not sufficient certainty to safeguard a specific site within this plan.

### **Policy 15: Devizes Wharf, Assize Court and Wadworth Brewery**

The Devizes Wharf, Assize Court and Wadworth Brewery site is allocated for regeneration including a mix of commercial, residential and recreation and cultural uses as well as restoration and reuse of key heritage assets within the site. As the focus of the site is regeneration there is not a housing requirement linked to this site, instead a suggestion is made that at least 100 dwellings could be delivered on the site but that this will be clarified as detailed proposals develop on the site outside of the Local Plan process.

A factual update will be provided on the Devizes Wharf, Assize Court and Wadworth Brewery allocation that will aim to provide further contextual information in relation to this site alongside an update of development management proposals within this regeneration site. The New Masterplanning Devizes Wharf Area Redevelopment and Feasibility Study 2022 Update has been produced with input from all key stakeholders involved in the site. It provides an evidence base document highlighting key requirements for the site.

## Main issues: Malmesbury Market Town

Table 3.27 Local plan Malmesbury Market Town main issues and Council response

Main issues: Malmesbury Market Town	
<p><b>Malmesbury housing / employment</b></p> <ul style="list-style-type: none"> <li>• <b>Level of growth should be higher:</b> There is capacity for growth at the town and the strategy for Malmesbury does not tackle the identified issues such as affordability and commuting by failing to optimise sustainable development opportunities at the town. The reduction from 665 to 600 dwellings since the last Regulation 18 consultation is not justified. A residual housing requirement of 0 is not supported by the evidence base and is not an effective strategy for the town.</li> <li>• <b>Malmesbury is not constrained:</b> Support for the identification for Malmesbury as a market town in the settlement strategy but the town should not be identified as a 'constrained' settlement.</li> </ul>	
<p><b>Reserve site</b></p> <ul style="list-style-type: none"> <li>• <b>The reserve site should be an allocation:</b> The reserve site should be an allocation to boost the supply of homes and to maintain a housing land supply.</li> <li>• <b>Reserve site should be withdrawn:</b> It undermines neighbourhood planning and should not be applied in areas that have achieved their housing numbers. If a reserve site remains the allocation of that site should be delegated to neighbourhood planning groups.</li> <li>• <b>Avoid impact on Cotswold National Landscape (CNL):</b> Reserve site should only brought forward if it can be demonstrated that harm to the setting of the CNL is avoided. For it to be justified further evidence would be need to demonstrate the potential benefits of the allocation outweigh the great weight that should be given to conserving and enhancing the landscape and scenic beauty of the CNL.</li> </ul>	
<p><b>Omission sites and site selection process</b></p> <p>A number of omission sites were promoted, including:</p> <ul style="list-style-type: none"> <li>• Land to the west of Milbourne, Land opposite the Knoll, Burton Hill (SHELAA site 3783), Land to the north of Whychurch Farm (west of the A429), Land at Lawn Farm, Land off Park Road, Backbridge farm (SHELAA 798).</li> </ul> <p>These were, in part, accompanied by critique of the processes that had led to the sites not being allocated.</p>	
Council response	
<p><b>Housing and employment</b></p>	



## Main issues: Malmesbury Market Town

Further information, including Council responses, in Table 3.17 provides strategic context on the decisions made, process and evidence informing the level and distribution of growth. The Planning for Malmesbury<sup>88</sup> document then provides place specific information including the context and challenges for Malmesbury alongside information relating to the key factors that have informed the distribution of growth, summarising information from a variety of evidence sources that informed this decision. Malmesbury is surrounded by a high quality physical environment with the Cotswolds National Landscape to the west and the confluence of the River Avon and Tetbury Avon south in the town. It has a high-quality built environment including the historic Malmesbury Abbey in the west of the town. For these reasons the level of growth is set lower than in the past and is intended to meet local housing needs. The amount of land needed for new homes has already been provided for at the town through planning permissions including those granted at appeal and the housing allocation planned for through the Malmesbury Neighbourhood Plan, to the north west of the town.

### Infrastructure, constraints and site selection

The Planning for Malmesbury document provides a host of information outlining how proposals for Malmesbury have been established and informed by a variety of evidence sources. This includes outlining the challenges, constraints and local infrastructure considerations for Malmesbury.

Appendix 2 of the Planning for Malmesbury document also summarises the site selection process for Malmesbury, outlining the findings from each stage. This includes detail on the pool of sites considered, the reasons for site removal via exclusionary criteria at stage 1 of site selection whilst also outlining the findings of stage 2 which further sifted sites based on a range of criteria. Following explanation as to whether any sites were then combined for further assessment, the document summarises the findings from sustainability appraisal and provides a table of sustainability appraisal key issues for sites assessed. Finally the findings of stage 4 are summarised. Stage 4 qualitatively examined the sites giving consideration to their capability of supporting the Local Plan's objectives for each community, in particular the identified 'Place Shaping Priorities' whilst also analysing the scale of growth that would be required to be drawn from the pool of the most sustainable site options to meet the identified housing and employment needs for the settlement.

### Reserve site

Further information, including Council response, in Table 3.18 provides context with regards the criteria for when a reserve site will be supported for appropriate proposals. Reserve sites, like site allocations, are a result of the site selection process with further information being available within the Planning for Malmesbury document, namely Appendix 2 that deals with site selection. The Council consider that a Statement of Common Ground (SOCG) is not considered necessary at this point in time.

Given the comments received on the location of the site in relation to the National Landscape, matters relevant to the site will also look to be covered within a SOCG that is being prepared between Wiltshire Council and the three National Landscape boards (Cotswold, Cranborne Chase and North Wessex Downs).

<sup>88</sup> [Planning for Malmesbury](#), Wiltshire Council (September 2023)

## Main issues: Melksham Market Town

Table 3.28 Local plan Melksham Market Town main issues and Council response

Main issues: Melksham Market Town
<p><b>Melksham housing / employment</b></p> <ul style="list-style-type: none"><li>• <b>Further allocations required:</b> The plan does not allocate enough houses to meet projected growth at Melksham. Further allocations should be considered to ensure the residual requirement.</li><li>• <b>Level of growth should be higher:</b> The reduction in housing provision at Melksham, where the residual requirement is now 1,160 new homes, is unjustified, particularly in the context of the overall housing need and given the acknowledged strategic role and unconstrained nature of the settlement.</li><li>• <b>Broad location for growth detail and delivery:</b> Given the timescales involved, broad locations of growth will not provide the supply later in the Plan period at the settlement that is required. Identifying a broad location for growth on the Key diagram at this stage would provide greater certainty to both landowners and the public and allow a more focussed immediate progression of masterplanning the area following Local Plan adoption.</li><li>• <b>No employment need:</b> The delivery of new employment land should have clear regard to the evidence base. There is no evidential basis for requiring the allocation of additional employment land at Melksham due to a surfeit of existing land with the A350 FEMA.</li><li>• <b>More employment need:</b> Melksham is now unable to attract, or even retain the large national and multinational employers of the past due to the lack of available space for their manufacturing and warehousing facilities. The local plan review identifies that the employment land review shows a significant demand for employment land in the Melksham area. Despite this, the plan only allocates 5ha of land for employment within Melksham. This is completely insufficient for the needs of existing businesses within Melksham.</li><li>• <b>Reliance to east of town:</b> Overall, there is an overreliance on sites to the east of the town which will have significant implications for wider infrastructure delivery in Melksham.</li></ul>
<p><b>Omission sites and site selection process</b></p> <p>A number of omission sites were promoted, including:</p> <ul style="list-style-type: none"><li>• Land at Upside, Land off A350, SHELAA site 3743, Land off the A365, SHELAA sites 1027 &amp; 715, Land West of Semington Road, site 14, Land south of Bowerhill, Land off Berryfield Lane, Land to the north of Melksham (site 15), Land off Woodrow Road (SHELAA 3107, part of Site 16), Cooper Tires site, Land south of Western Way, Land west of Semington Road, Land at Boundary Farm (Site 11), Land at Snarlton Farm.</li></ul> <p>These were, in part, accompanied by critique of the processes that had led to the sites not being allocated.</p>
<p><b>Site selection process</b></p>

## Main issues: Melksham Market Town

- **Joining / splitting of sites:** The sites East of Melksham were separated and without any supporting evidence, three sites were carried forward to the Pre-submission Plan. The Site Selection Methodology provides no clarity on how conjoined sites are separated based on an evidence based approach.
- **Place shaping priority assessment:** The site selection process as established through the use of the arbitrary Place Shaping Priorities is not sound and is heavily skewed to favour larger sites rather than being based on the Sustainability Appraisal Process. The result has therefore made the draft allocations unsound.

### Place shaping priority

- **Inappropriate to safeguard canal route:** It is entirely inappropriate to continue to safeguard a future route for the Wilts and Berks Canal. The scheme is undeliverable and has been safeguarded for many years, without being delivered. There is no justification for its continued safeguarding.
- **No regard to attempt to deliver canal route:** Clear and convincing evidence to justify the selection of the allocated sites has not been provided, having regard to the available alternatives and the plans aspiration to plan positively for the new canal link which has been a long-term community and Council aspiration, and otherwise continues to be safeguarded in the plan.
- **Mechanism to deliver canal link:** The Melksham link scheme when completed is estimated to benefit the town by upwards of £7m p.a. Policy should identify a delivery mechanism for Melksham Link beyond protection of the route.
- **Lack of sites supporting bypass:** The Council appear to plan on submitting the Full Business Case in 2026 with the scheme then expected to progress over the following 7 years (i.e. until 2033). If these timeframes are met, the bypass would be completed and open comfortably within the plan period that runs to 2038. Given these timescales, it is illogical that the Council is not proposing to allocate and deliver suitable strategic sites that can kick-start this vital infrastructure project through this plan
- **Reliance on bypass:** Transport modelling has been undertaken with a reliance on the delivery of a bypass to unlock housing in Melksham, a settlement which scores favourably in the modelling, yet there are still significant risks which could prevent the implementation of this important project.
- **Bypass uncertainty:** There is little information about when an A350 Melksham bypass would be delivered and some doubt over whether it will be delivered at all. The local plan appears broadly silent on this topic. Planning for Melksham document states that progress of the project has been slower than expected. This fundamentally calls into question the settlement strategy for Melksham and raises key questions on the bypass funding, timing and the growth required to support it.

### Policy 18: Land east of Melksham

- **Housing numbers under estimated:** The capacity of the draft allocation to the East of Melksham is significantly under-estimated and should be increased in and of itself, and to help offset likely shortfalls elsewhere within the other HMAs.
- **Lack of contributions to transport strategy / bypass:** Noted the omission that the policy contains no reference to contributions to the Melksham Transport Strategy/bypass. Adding such significant contributions brings into question the viability of the overall scheme. It is essential that detailed evidence is provided to underpin the site's allocation, particularly as its location is clearly predicated on the potential to deliver the bypass.

## Main issues: Melksham Market Town

- **Self build:** There is no justification for including / the location of self build plots within the concept plan.
- **Transport impact upon Lacock / rural roads:** Do not consider that the proposed housing allocations on the east side of Melksham are sound, in respect of consistency with national policy, in the absence of any means to avoid the new housing adding to the traffic using rural lanes and Lacock village.
- **Omission site:** Land at Snarlton farm. A small area missed out from the Land East of Melksham allocation can be seen on the southwestern part of the allocation. It is not justified to not include this land in the allocation.

### Policy 19: Land off Bath Road

- **Land for expansion of education facility:** It is understood that the 2ha is a maximum land requirement based on the area used previously for school expansion, and a smaller area might be required, subject to any feasibility study. Hence, 2ha should clearly be set as a maximum, providing justifiable flexibility until the final land requirement is known.

### Policy 20: Land north of A3102

- **Omission site and housing figure:** SHELAA site 3743 should be included as part of the allocation and with this, the site could accommodate 385 dwellings.
- **Transport impact upon Lacock / rural roads:** Do not consider that the proposed housing allocations on the east side of Melksham are sound, in respect of consistency with national policy, in the absence of any means to avoid the new housing adding to the traffic using rural lanes and Lacock village.

## Council response

### Housing, employment and place shaping priorities

Further information, including Council responses, in Table 3.17 provides strategic context on the decisions made, process and evidence informing the level and distribution of growth. The Planning for Melksham<sup>89</sup> document then provides place specific information including the context and challenges for Melksham alongside information relating to the key factors that have informed the distribution of growth, summarising information from a variety of evidence sources that informed this decision. For Melksham, a settlement that is not significantly environmentally constrained, this has included striking a balance between meeting growth needs and the ability of local infrastructure to accommodate this growth, for instance the A350. Housing growth over the Plan period is lower than in recent years, which exceeded planned rates in the development plan, but maintains a steady pace of growth at the town with additional allocations to the east. The Plan allocates three sites, which will collectively deliver new infrastructure for the town and employment land including the expansion of the Melksham Oak Academy secondary school.

<sup>89</sup> [Planning for Melksham](#), Wiltshire Council (September 2023)

## Main issues: Melksham Market Town

Policy 17 of the Local Plan states that development at Melksham will not undermine the delivery of an A350 bypass. At the current time, there is insufficient certainty that a bypass scheme will be delivered, and a final route has not been agreed. The proposed housing site allocations at Melksham are not reliant on a future bypass coming forward.

The council supports in principle the restoration of the Wilts and Berks (including the necessary creation of the Melksham Canal Link). There are current proposals (planning application W/12/01080/FUL) to provide a canal link from Semington to the River Avon as part of the restoration of the Wilts & Berks canal, although there have been delays with this application. This scheme has the potential to deliver significant environmental, social and economic benefits for Melksham. There is also a Place Shaping Priority to continue to safeguard a future route and enable its delivery.

### **Infrastructure, constraints and site selection**

The Planning for Melksham document provides a host of information outlining how proposals for Melksham have been established and informed by a variety of evidence sources. This includes outlining the challenges, constraints and local infrastructure considerations for Melksham.

Appendix 2 of the Planning for Melksham document also summarises the site selection process for Melksham, outlining the findings from each stage. This includes detail on the pool of sites considered, the reasons for site removal via exclusionary criteria at stage 1 of site selection whilst also outlining the findings of stage 2 which further sifted sites based on a range of criteria. Following explanation as to whether any sites were then combined for further assessment, the document summarises the findings from Sustainability Appraisal and provides a table of sustainability appraisal key issues for sites assessed. Finally the findings of stage 4 are summarised. Stage 4 qualitatively examined the sites giving consideration to their capability of supporting the Local Plan's objectives for each community, in particular the identified 'Place Shaping Priorities' whilst also analysing the scale of growth that would be required to be drawn from the pool of the most sustainable site options to meet the identified housing and employment needs for the settlement.

### **Policy 18: Land east of Melksham**

Statements of Common Ground (SOCG) are underway with the site promoters of this allocation, PlanningSphere representing Sutton and Stiles and tor&co representing Gleeson Land. These SOCG will provide contextual information and focus on key issues relevant to the site. They will aim to provide commentary on any areas of disagreement as well as establish common ground on matters in principle. They will also contain housing trajectory information. To inform the examination process and assist the Inspector, SOCG will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector. Key topic areas these SOCG will aim to cover include site access between sites controlled by different landowners, primary school provision, the amount of employment provision, site capacity for housing and delivery of necessary infrastructure.

### **Policy 19: Land off Bath Road**

## Main issues: Melksham Market Town

A Statement of Common Ground (SOCG) is underway with the site promoter of this allocation, Hannick Developments Ltd, that will provide contextual information and focus on key issues relevant to the site. This will aim to provide commentary on any areas of disagreement as well as establish common ground on matters in principle. This will also contain housing trajectory information. To inform the examination process and assist the Inspector, SOCGs will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector. Key topic areas this SOCG will aim to cover include the area required for expansion of Melksham Oak Community School, housing capacity of the site and status of the Concept Plan.

A suitable area of land will be secured for the expansion of Melksham Oak Community School to allow housing development allocated in the Local Plan at Melksham to be delivered. The Academy has already been expanded on its current site to meet the demands of current housing growth and is not able to be expanded further on that site. There are currently some surplus places but land adjacent to the school is required to allow for the expansion from a 10FE to a 12FE i.e. 300 additional places.

### **Policy 20: Land north of A3102**

A Statement of Common Ground (SOCG) is underway with the site promoter of this allocation, Bloor Homes South West, that will provide contextual information and focus on key issues relevant to the site. This will aim to provide commentary on any areas of disagreement as well as establish common ground on matters in principle. This will also contain housing trajectory information. To inform the examination process and assist the Inspector, SOCGs will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector. Key topic areas this SOCG will aim to cover include the need for a comprehensive masterplan to be delivered prior to a planning application, provision of secondary/emergency access to the site, concerns over provision of play facilities and viability.

### 3.2.5 Main issues: Local Plan section 4 (Salisbury HMA)

**3.26** Presented below are the main issues raised by the representations with regards Local Plan section 4 focusing upon the strategy for the Salisbury HMA, namely:

- Strategy for the Salisbury HMA
- Salisbury New Community
- Salisbury Principal Settlement
- Amesbury Market Town (Including Boscombe Down and Porton Down)
- Tidworth and Ludgershall Market Town
- Salisbury rural area (Policy 41 Land at Bulbridge Estate, Wilton; Policy 42 Land at Dead Maid quarry employment area, Mere; Policy 43 Land safeguarded for education at Tanner's Lane, Shrewton)

**3.27** Within the table for each place are the main issues raised for all policies associated with that place. For instance, the Salisbury principal settlement table will contain main issues for policy's 22 to 35.

**3.28** Where representations have presented issues as per those reported against sections 1-3 of the draft Plan, these have not been repeated against these place specific policies. However, in some instances further place specific detail may be provided. Please refer to the main issues presented against sections 1-3 of the draft Plan to understand these overarching plan wide matters.

**3.29** Given the overlap between the comments for the strategy for all the rural areas, these main issues have been presented in one table covering topics relevant to the strategy for all rural areas after the presentation of main issues for each HMA. However, in the case of Salisbury HMA, the main issues relating to policies 41 to 43 have been presented in a separate table within the presentation of main issues for the Salisbury HMA.

### Main issues: Strategy for the Salisbury HMA

**Table 3.29 Local plan Strategy for the Salisbury HMA main issues and Council response**

#### Main issues: Strategy for the Salisbury HMA

**Strategy does not meet needs of Salisbury HMA and relies on unidentified sites:** The strategy fails to properly address meeting identified local housing needs of the Salisbury HMA with the existing completions and commitments alongside allocations not meeting the housing need. It also relies heavily on unidentified sites and optimistic assumptions. There is inadequate land allocated to meet the growth needs. The Revised Spatial Strategy acknowledges that

## Main issues: Strategy for the Salisbury HMA

the forecast housing needs for Salisbury cannot be met in full at this time. It then goes on to state that: “For this iteration of the Plan however, an overall housing requirement for the County should not be reduced since there is contingency to compensate elsewhere in Wiltshire”. It cannot be the case that contingency in another HMA can meet the needs attributed to the Salisbury HMA.

**Supplement growth with allocations away from the arbitrary Salisbury boundary / rural housing figure requires allocations:** The housing figure for the rural area needs to be supported with allocations / meeting the needs of Salisbury could be supplemented allocations at smaller settlements immediately / surrounding Salisbury (e.g., Laverstock). Too much focus is placed on the main settlement to the detriment of other sustainable alternatives / rural communities.

### New settlement strategy

- **New settlement:** A new settlement of the scale proposed is not a realistic option to deliver homes in this Plan period, due to long lead in times; the Local Plan should be planning to meet needs for this plan period; it is not sound to rely on these numbers for this plan period. Such a proposal needs to be supported by a more robust evidence base.
- **New settlement alternatives not considered adequately:** The draft Plan and Sustainability Appraisal have not appropriately or robustly considered reasonable alternatives to a new settlement as a long-term growth strategy including allocating additional growth to the principal centres. A more refined assessment of available strategic development site options elsewhere should be undertaken to inform the plan, having regard to identified development opportunities, including anticipated designed in mitigation and enhancement. There are sites within the Salisbury HMA that can accommodate housing need and be deliverable within the plan period.

### Sustainability Appraisal

**Why is the most sustainable option not chosen:** It is unclear from the published evidence why Strategy SA-F is considered to be most sustainable when its SA score is not superior to two of the original development strategies. The rationale for the value judgements made in the SA are unclear.

## Council response

### Level and distribution of growth

Further information, including Council responses, in Table 3.17 provides strategic context on the decisions made, process and evidence informing the level and distribution of growth. The Planning for Salisbury<sup>90</sup>, Planning for Amesbury<sup>91</sup> and Planning for Tidworth and Ludgershall<sup>92</sup> documents provide place specific information including the context and challenges for each place alongside summaries relating to the key factors that have informed the distribution of growth for each settlement, summarising information from a variety of evidence sources informing these decisions.

<sup>90</sup> [Planning for Salisbury](#), Wiltshire Council (September 2023)

<sup>91</sup> [Planning for Amesbury](#), Wiltshire Council (September 2023)

<sup>92</sup> [Planning for Tidworth and Ludgershall](#), Wiltshire Council (September 2023)



## Main issues: Strategy for the Salisbury HMA

By contrast to elsewhere in the County, there is uncertainty surrounding both the locations and scale of growth that can be supported in the Salisbury HMA. The revised spatial strategy imposes a phased approach to housing delivery to take into account environmental constraints and need for infrastructure which occurs largely in the Salisbury HMA. Slower rates than that implied to meet forecast need are proposed in the seven years from 2024 to 2031. Higher rates are possible and envisaged for the remaining seven years for 2031 to the end of the plan.

Rates are curtailed in the first phase (from 2024 to 2031) because mitigation to protect the River Avon is uncertain and a precautionary approach is to moderate development pressures. Higher rates later in the plan period assumes protection measures for the river are in place and limited land supply is resolved by proposals for a potential new settlement. However, the approach also allows flexibility, for example, if either of these issues cannot be resolved, a future iteration may then set a lower requirement that replaces the current one. A decision to proceed or not with a new community to resolve a shortfall of suitable land will therefore be an outcome of work on a future iteration of the Local Plan. For plan making purposes, the Revised Spatial Strategy makes provision for approximately 1,600 dwellings, should it proceed. It is not relied upon to make any significant contribution to housing supply in the plan period and just a notional 300 dwellings approximately are assumed built by 2038.

## Main issues: Salisbury New Community

Table 3.30 Local Plan Policy 21 Salisbury New Community main issues and Council response

Main issues: Policy 21 Salisbury New Community
<p><b>Detail must be provided in the interests of deliverability</b></p> <p>The current draft Plan identifies a large and vague "area of search" for a possible new community in the future and does not represent a positively planned future for the southern Wiltshire community. Delivering major new settlements takes long lead times and significant upfront planning. The policy should identify a specific location for the new community and that a realistic assessment of likely rates of delivery in the mid – late plan period should be included in the Plan. Postponing this proposal to some future local plan review is not justified. It is not possible to rely on any potential development from this source in the plan period and it is not considered deliverable within the plan period and is subsequently unsound.</p>
<p><b>Alternatives should be considered</b></p> <p>Whilst the Council has highlighted that a new settlement would not be required to meet housing needs in this plan period, and implied that it would be assessed against other spatial options in a future Local Plan Review, and further evidence to support one would be required. It raises the question as to whether including a confined area of search within a strategic policy is a robust approach. Representors considered that the uncertainty regarding the delivery of this new settlement means other alternatives must be assessed to deliver growth.</p>
<p><b>Inconsistency with broad locations for growth</b></p> <ul style="list-style-type: none"><li>• <b>Identified area:</b> The draft Local Plan takes a differing approach between the broad locations for growth and the Salisbury 'new settlement', where draft Policy 21 refers to an 'area of search' for a 'possible new community' as shown on the Key Diagram, with the need to be confirmed through a 'review of this Plan'. There is therefore a greater commitment to a geographic location for the new settlement than there is for the broad locations for growth.</li><li>• <b>Level of growth:</b> The supporting text gives further detail of the potential requirements for the settlement, including 1,500 – 2,000 homes, 5ha of employment land and associated infrastructure. There is no evidence as to how these numbers, which may fall beyond the Plan period, have been calculated. The housing numbers for the three principal settlements/Broad Locations for Growth are not confirmed, despite the housing being needed to secure the land supply/offer flexibility within the latter part of this Plan period. There is also no evidence or justification as to which of these takes precedent.</li></ul>
<p><b>Omission site</b></p> <p>The following omission site was promoted for a net zero new community:</p> <ul style="list-style-type: none"><li>• Ford farm</li></ul> <p>This was, in part, accompanied by critique of the processes that had led to the site not being allocated.</p>
<p><b>Council response</b></p>

## Main issues: Policy 21 Salisbury New Community

### **Policy 21 Salisbury Area New Community**

An Area of search is shown on the key diagram within which a new settlement may be proposed in the future, subject to more detailed work as a part of a future review of this Local Plan. Concerns regarding Salisbury area new community appear linked to the overall level of housing being planned for. The area of search for a new settlement and indeed the phasing element of overall housing delivery set within draft Policy 2 (Delivery strategy) have been included in the Plan to reflect the constrained nature of the Salisbury area in terms of ecological and heritage factors, as well as limited land availability. As set out in the Local Plan, the precise details of where a new settlement would be situated, along with its size, will be a matter for a review of this Local Plan to consider and reflect further evidence. If a new settlement is needed, building will commence toward the end of the plan period and construction would continue beyond 2038. In terms of estimated housing land supply and matching it to forecast need, an estimate is made of how many homes would be built before 2038 taking account the planning process and necessary lead in times to construction.

## Main issues: Salisbury Principal Settlement

Table 3.31 Local plan Salisbury Principal Settlement main issues and Council response

Main issues: Salisbury Principal Settlement
<p><b>Salisbury housing / employment</b></p> <ul style="list-style-type: none"> <li>• <b>Not adequate use / consideration of brownfield sites:</b> Considering the number of brownfield sites available (e.g., Churchfields) it is disappointing and not accurate to only make provision for 60 dwellings for the Salisbury neighbourhood area on brownfield sites - this number should be higher.</li> <li>• <b>Employment need incorrect:</b> The 12.3ha referenced is not the identified employment land need at Salisbury. The Employment Land Review (para 6.2.11) states that at Salisbury and Wilton there is cumulative demand for up to 5.6ha for Offices and 4.3ha for industrial, resulting in a cumulative demand of up to 9.9ha. It is not clear why Policy 22, which relates specifically to the Salisbury Principal Settlement, includes within its employment land requirement the provision for Wilton.</li> <li>• <b>Clarity on employment sites:</b> It is noted that through this Local Plan it is proposed that saved policy H 2D is deleted. Policy E1 is also to be deleted. However, within the Planning for Salisbury paper (paragraph 24) it states that: 'The Local Plan will ensure that existing allocations for employment use, for example those at Fugglestone Red (Core Strategy Policy 20) and Old Sarum ('saved' policy E1) continue to be retained for such purposes'. There is an inconsistency in this regard, and this should be addressed to ensure the status of employment land at Old Sarum is clarified.</li> <li>• <b>Employment allocations insufficient:</b> Despite the findings of the Employment Land Review (ELR) Policy 22 provides no new employment land allocations within the principal settlement of Salisbury. Only three small new allocations are proposed across the Salisbury HMA to supplement existing allocations.</li> </ul>
<p><b>Omission sites and site selection process</b></p> <p>A number of omission sites were promoted, including:</p> <ul style="list-style-type: none"> <li>• Land North and South of Milford Mill Road (Salisbury), Quidhampton Quarry, South of Downton Road (site 7), Land south of Netherhampton Road, Land north of Netherhampton Road, Old Sarum Airfield, Ford Farm new community, Land at Britford Lane (Harnham) and Land adjacent to Salisbury District Hospital, Fugglestone Red,</li> <li>• <b>Quidhampton Quarry:</b> Figure 4.15 of the draft plan identifies part of Quidhampton Quarry site (the previous employment allocation, and then known as 'Former Imerys Quarry) as an allocation, yet there is no mention of this allocation in Policy 22. Further, Table A.2 makes no mention of the deletion of the site as an allocation. The site is suitable for alternative uses.</li> </ul> <p>These were, in part, accompanied by critique of the processes that had led to the sites not being allocated.</p>
<p><b>Constraints</b></p> <ul style="list-style-type: none"> <li>• <b>Transport infrastructure / AQMA / transport evidence:</b> The transport system in Salisbury cannot cope with the additional traffic from housing sites allocated in the Local Plan and the impacts upon the AQMA have not been considered or mitigated. No improvements have taken place to the Harnham Gyratory and New Bridge Road and there appear to be no plans / evidence / transport strategy to plan for improvements. The lack of detailed plans for the improvements</li> </ul>

## Main issues: Salisbury Principal Settlement

to the Harnham Gyratory, New Bridge Road and Exeter Street Roundabout confirm that there is no plan to address the substantial impact of additional traffic associated with new site allocations. Any 'Transport Refresh' work does not appear to take into account the additional traffic from the new allocations. The Transport Evidence base says that the Gyratory will be at 97% capacity by 2036 and there appears to be a reliance on developer contributions from greenfield development to fund any improvements. Concerns were voiced about the ability to fund the transport improvement requirements. The Salisbury Transport Strategy needs to be updated.

- **Phosphate neutrality:** Allocated sites in Salisbury need to consider the need to neutralise levels of phosphates entering the SAC. There is little detail at this time to explain how sites which are allocated for development will benefit from any strategic mitigation. Such clarity is needed in order to provide the appropriate mechanism for securing necessary mitigation related to the River Avon SAC.

### Salisbury Neighbourhood Plan

- **Ignored neighbourhood plan / windfall:** It is not understood why Wiltshire Council has ignored the Salisbury Neighbourhood Development Plan which states that between 2,250 and 2,850 'windfall' homes could be delivered over the 18-year Plan period. The draft Plan should make specific and justified windfall expectations on brownfield land, particularly that land under the ownership of Wiltshire Council, to meet the identified housing requirement within the built up area of Salisbury.
- **Area designation requirement too low:** The Salisbury neighbourhood area designation requirement seems to have been reduced from 410 to 60 dwellings. No explanation of this is given. This appears to be too low.

### Policy 23: Land north east of Old Sarum

- **Unsuitable for development / constraints:** Representors outlined the site as unsuitable for development based on factors including landscape impacts (e.g., impact on Monarchs Way), lack of local facilities, heritage impacts (e.g., Old Sarum and Figsbury Ring scheduled monuments), poor access arrangements (e.g., conflicting with access to Throgmorton Hall).
- **Poor accessibility / car reliance:** Distance to the city and employment opportunities means this site cannot be considered to be in a sustainable location.
- **Transport impact:** Policy does not sufficiently mitigate for the additional load on the transport network. Reliance on improvements to bus and cycling network will not mitigate private car use. A combined new bus service with Longhedge is not deliverable or achievable and reference to this should be removed from the Concept Plan. The combined quantum of development would be insufficient to make a "bus-only link" commercially sustainable.

### Policy 24: Land at Netherhampton Road Garden Centre

- **Unsuitable for development / constraints:** Representors outlined the site as unsuitable for development based on factors including landscape impacts (e.g., impact upon Cranborne Chase National Landscape).
- **Heritage impact:** Impact upon views of the spire and possible requirement for heritage impact assessment as per Historic England representation
- **Groundwater and surface water flooding:** Site is in an area where there may be groundwater and surface water issues that will need to be addressed as per Environment Agency representation.

## Main issues: Salisbury Principal Settlement

- **Isolated location:** The site allocation is in an isolated location and as such is not suitable for development given the distance to services and facilities. This is notwithstanding the proposed growth near the site allocation.
- **SANG:** It is unclear from the Policy 24 wording whether the SANG area identified in Policy 29 has been secured for this purpose. If it has been secured then the policy should clarify that a contribution to the SANG will be required. If not then there remains uncertainty as to whether the scheme will be deliverable as per Natural England representation. The Policy and or supporting text should specify that the necessary SANG provision for the development must be secured prior to commencement of the development and the facility open and available to the public by first occupation. As per Natural England representation.
- **Site unavailable:** Site appears to be based on a SHELAA submission prior to the site being sold to a new landowner. It is understood this site is not available for development.
- **Coalescence:** This site allocation does not accord with the draft Plan's strategy to maintain distinctiveness between Salisbury and Netherhampton.
- **Transport impact:** This site will add still further to the traffic congestion along Netherhampton Road leading to the Harnham Gyratory and Park Wall.

### Policy 25: Land north of the Beehive Park & Ride

- **Housing number:** The site is capable of delivering up to 115 dwellings in the context of known constraints and an appropriate density for its location.
- **The Concept Plan inaccuracy:** The concept plan identifies proposed new Public Rights of Way within the employment land area which forms part of the saved allocation H 2D/E1. Such provision does not form part of either the allocated policy or the subsequent outline planning application. As such, there is concern that the Concept Plan will impose requirements on land which does not form part of the allocated land north of Beehive Park and Ride and in doing so, frustrate the delivery of employment land pursuant to the provisions of the saved policy H2 D/E1.
- **Heritage:** The allocation is visible from the Northern and Eastern slopes of Old Sarum Scheduled Monument. The impact of development needs to be considered alongside new development and cumulative impact on the semi rural setting. The relationship between the site and the setting of Old Sarum needs to be understood to inform site suitability and to minimise harm as per Historic England representation.
- **Groundwater and surface water flooding:** Site is in an area where there may be groundwater and surface water issues that will need to be addressed as per Environment Agency representation.
- **Community woodland:** Natural England outlined that it is unclear whether the establishment of the community woodland will be a requirement of the development. If it is intended that the community woodland is to be provided by the development this should be secured by appropriate policy wording. The Concept Plan should also refer to a "Community Woodland" rather than a SANG.

### Policy 26: Land North of Downton Road

- **Unsuitable for development / constraints:** Representors outlined the site as unsuitable for development based on factors including heritage impacts (e.g., archaeology, conservation area impacts, cathedral view), landscape (impact upon Britford), access to site dangerous on A338, a lack of education capacity, a lack of healthcare capacity, a lack of waste water capacity.

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- **Petition, Land North of Downton Road:** One petition of 1386 signatures was received (comment number 2058). This petition set out opposition to the site being developed on grounds including the loss of the distinctiveness of Britford and impact upon conservation areas, transport impact and flood risk.
- **Biodiversity:** Representors outlined concern with regards the impact upon the bordering ecologically sensitive areas of the River Avon SAC, the East Harnham Meadows SSSI and the Britford Water Meadows SSSI. Natural England set out the need to protect the SSSI from potential harmful impacts and that this should be set out in the supporting text and be a requirement of the Policy.
- **Heritage:** The site is on a key approach to the city with important views of the cathedral spire. Development should preserve and enhance the setting of the spire and views of the spire should not be lost or impaired. The concept plan shows development parallel to the road interrupting views of the spire and causing significant harm. Development would likely have an impact on the open rural character of Britford Conservation Area and there should be a separation to avoid this. Grade 2\* Registered Park and Garden at Longford Castle should be considered. This is as per Historic England comments.
- **Transport impact:** The requirements for the site proposed under Policy 26 fail to include funding of a scheme at Harnham Gyratory and Exeter St roundabout to provide extra vehicular capacity. The proposals have not taken into consideration the impacts upon the transport network and impact on traffic through Britford village.
- **Poor accessibility / car reliance:** Services and facilities (e.g., school) are reached by a long and steep hill that will increase car reliance, congestion and impact residents.
- **Coalescence:** The draft plan appears to recognise the importance of maintaining separation and distinctiveness between Salisbury and Wilton, and between Salisbury and adjacent settlements but this does not seem to have been followed for this site allocation in terms of the impact upon Britford.
- **Groundwater and surface water flooding:** Site is in an area where there may be groundwater and surface water issues that will need to be addressed as per Environment Agency representation. Evidence was submitted by a representor to outline that the site is sensitive to changes in hydrology and hydrogeology, whether from climate change or from nearby development. Development at the site would result in a significant increase in volume and rate of runoff of surface water and will exacerbate flooding off site.
- **SANG uncertainty:** Natural England outlined that it is unclear from the policy wording whether the Policy 29 SANG has been secured for this purpose - it should be clarified that a contribution to the SANG will be required if it has been secured. The Policy/supporting text should specify that the necessary SANG provision for the development must be secured prior to commencement of the development and the facility open and available to the public by first occupation.

## Policy 27: Land South of Harnham

- **Unsuitable for development / constraints:** Representors outlined the site as unsuitable for development based on factors including lack of employment opportunities nearby, concern over access being achievable and safe to the site / the need for a second access, concern over impact upon and loss of biodiversity and Lime Kiln Down CWS, impact upon dark skies at / landscape setting of Cranborne Chase National Landscape, negative impact upon historic setting of Salisbury, a lack of education capacity, a lack of healthcare capacity, a lack of waste water capacity, a lack of electricity grid capacity.
- **SANG:** It is unclear from the Policy 27 wording whether the SANG area identified in Policy 29 has been secured for this purpose. If it has been secured then the policy should clarify that a contribution to the SANG will be required. If not then there remains uncertainty as to whether the scheme will be deliverable. The Policy and or supporting text should specify that the necessary SANG provision for the development must be secured prior to commencement of the

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development and the facility open and available to the public by first occupation. As per Natural England representation. The allocation includes the Woodbury Ancient Village Scheduled Ancient Monument as green infrastructure. While Natural England has no objection to this approach, confirmation is needed as to whether this area will be used as SANG and whether this will be in addition to the adjacent area of SANG / Country Park proposed by Policy 29. The proposed SANG is on land part owned by Salisbury City Council. The proposal is not based on any discussions with the City Council.

- **Heritage:** Historic England have assumed a HIA has been undertaken. There is significant archaeology associated with the Woodbury scheduled monument. Policy 27 should include a similar condition to ensure that the layout of the development is designed to avoid significant features and ensure development positively responds.
- **Transport impact:** Representors outlined concern with regards the impact upon the transport network from and around Harnham and Britford. The requirements for the site proposed fail to include funding of a scheme at Harnham Gyratory and Exeter St roundabout to provide extra vehicular capacity.
- **Poor accessibility / car reliance:** Services and facilities (e.g., school) are reached by a long and steep hill that will increase car reliance, congestion and impact residents.
- **Groundwater and surface water flooding:** Site is in an area where there may be groundwater and surface water issues that will need to be addressed as per Environment Agency representation.

## Policy 28: Land West of Coombe Road

- **Unsuitable for development / constraints:** Representors outlined the site as unsuitable for development based on factors including lack of employment opportunities nearby, concern over access being achievable and safe to the site / the need for a second access, concern over impact upon and loss of biodiversity and Lime Kiln Down CWS, impact upon dark skies at / landscape setting of Cranborne Chase National Landscape, negative impact upon historic setting of Salisbury, a lack of education capacity, a lack of healthcare capacity, a lack of waste water capacity, a lack of electricity grid capacity.
- **SANG:** It is unclear from the Policy 27 wording whether the SANG area identified in Policy 29 has been secured for this purpose. If it has been secured then the policy should clarify that a contribution to the SANG will be required. If not then there remains uncertainty as to whether the scheme will be deliverable. The Policy and or supporting text should specify that the necessary SANG provision for the development must be secured prior to commencement of the development and the facility open and available to the public by first occupation. The proposed SANG is on land part owned by Salisbury City Council. The proposal is not based on any discussions with the City Council.
- **Heritage:** Historic England have assumed a HIA has been undertaken.
- **Transport impact:** Representors outlined concern with regards the impact upon the transport network from and around Harnham and Britford. The requirements for the site proposed fail to include funding of a scheme at Harnham Gyratory and Exeter St roundabout to provide extra vehicular capacity.
- **Poor accessibility / car reliance:** Services and facilities (e.g., school) are reached by a long and steep hill that will increase car reliance, congestion and impact residents.
- **Groundwater and surface water flooding:** Site is in an area where there may be groundwater and surface water issues that will need to be addressed as per Environment Agency representation.



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### Policy 29: Suitable Alternative Natural Greenspace, South Salisbury

- **Lack of detail and Lime Kiln Down CWS:** There is a lack of clarity in relation to quantum of the SANG and in relation to the Lime Kiln Chalk CWS, which comprises about half of the overall SANG provision. It would be helpful to distinguish more clearly between that area (owned by the Council and where there is a greater emphasis on ecological conservation), and the additional land to the south of it which is proposed to be taken out of agricultural use in order to create new recreational / SANG opportunities.
- **Completion prior to occupation of first dwelling:** How will it be ensured that the SANG is delivered prior to the delivery of development at allocated sites in Salisbury? SANG should be secured prior to commencement of the schemes allocated under Policies 24, 26, 27 and 28 and be available for public use prior to occupation as per Natural England representation.
- **Funding regime:** Greater clarity is required regarding the delivery of the SANG pursuant to Policy 29 and the funding regime to support this. In circumstances where the ring-fenced CIL contribution is not adequate to implement the objectives of Policy 29, the implications on the cost burdens for those allocations subject to the SANG requirement must be adequately explained.
- **Impacts upon Lime Kiln Down CWS:** Lime Kiln CWS is already an area of protected open space. The SANG should not incorporate the CWS, it should be additional open space. Mitigation from extra use of a CWS cannot be achieved by merely changing its designation.
- **Impacts on Woodbury Ancient Villages Scheduled Monument:** Concerns were voiced with regards the impacts upon the setting of this scheduled monument.

### Policy 30: Land East of Church Road, Laverstock

- **Impact upon Cockley Down SSSI:** Concern regarding the impact of development on the landscape and biodiversity impacts at this SSSI. The allocation is in close proximity to the Cockley Down SSSI. Recreational assessments already completed have demonstrated that an increase in recreational activity on the reserve (e.g. dog walking) is likely. The supporting text and Policy wording should recognise that increased recreational activity are likely to result from the allocation and that any resulting increase in reserve management costs, including increased requirements for warden visits, are appropriately compensated as per Natural England representation.
- **Housing number and site area:** The site area should reflect the physical features of the site and extend to the existing string hedgerow which forms the fields eastern boundary. This would enable capacity to be optimised on the site. The housing number is not reflective of what is deliverable on site. The capacity should be approximately 135 dwellings which would make the policy more effective.
- **Land to north:** The capacity of the allocation would be further increased if the field to the north, in the same ownership, is included as part of the allocation albeit only for green and blue infrastructure purposes (including for Biodiversity Net Gain).
- **Transport impact:** Representors outlined concern with regards the impact upon the transport network along Church Road which already see's heightened traffic from the ring road avoidance.

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- **Small village development:** Laverstock is a Small Village. It was designated a Small Village because it has limited services and facilities. The allocation of 50 homes is too large for a Small Village and is contradictory to Policy 1 which states that infill only is permitted at Small Villages. Development here does not meet the needs of Salisbury.
- **Neighbourhood Planning:** Consider that development on the land east of Church Road, Laverstock would not be in accordance with the Laverstock & Ford Neighbourhood Plan.
- **SANG:** The allocation site is too small for the necessary SANG provision is be provided within the allocation. Clarification is needed on the location and scale of the SANG for the allocation as well as how the SANG will connect with the public footpath network as per Natural England representation. If less than 50 dwellings were to be erected on the proposed allocation then the guidelines in the interim Recreation Mitigation Strategy for the New Forest Internationally Protected Sites would apply, namely a financial contribution being paid rather than the “provision of Suitable Alternative Natural Greenspace”.
- **Sustainability Appraisal / site selection:** The issues highlighted in the SA and number of 'moderate adverse' effects noted make this one of the least sustainable sites and it should not therefore be allocated for housing development.

### Policy 31: Salisbury Central Area

- **Lack of clearly defined area:** The ‘Central Area’ referred to in the Policy is not clearly defined in the Local Plan. It may mean the area within the Central Area Framework, however this does not form part of the Local Plan and nor has its extent been defined within it. It is therefore unclear from Figure 4.23 what area the Central Area under this policy covers.
- **Neighbourhood Planning:** The neighbourhood plan provides more precision than this policy and the draft Plan should reference this document as part of the development plan.
- **River Avon SAC:** The Salisbury Central Area includes stretches of the River Avon SAC. The associated policies should therefore include a requirement to protect and enhance the ecology of the river corridor and ensure development avoids additional light spill into the designated site as per Natural England representation.

### Policy 32: Salisbury Skyline

- **Open to challenge / unjustified changes:** There seems to be no evidence underpinning the changes to this policy from the Wiltshire Core Strategy with the removal of some text opening the policy up to challenge in terms of adherence. The policy within the Wiltshire Core Strategy should be retained / remain unchanged.

### Policy 33: Maltings and Central car park

- **No masterplan / deliverability:** The Maltings has not been delivered and its future is uncertain. The Maltings Masterplan is based on a retail-led approach that is inappropriate in the current economic environment and there is no revised masterplan in the LPR evidence base and since the current masterplan has proven to be undeliverable, this policy is unjustified. An updated masterplan is required setting out a revised quantum of development, both residential and commercial.

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- **Account for housing numbers:** It is not clear why the housing numbers estimated to be deliverable on this site do not appear to have been considered as part of the housing delivery for Salisbury.
- **Flooding:** The policy should reference the Level 2 SFRA for Salisbury, and this document must be available to support the Local Plan. The LPA should also ensure that this SFRA Level 2 reflects the latest modelling associated with the Salisbury River Park flood alleviation scheme as per Environment Agency representation.
- **Site selection:** The site was not included through the SA/site selection process, so it is uncertain how it performs against other sites.

### Policy 34: Churchfields employment area

- **Land use flexibility:** Representors queried the effectiveness of the use types proposed on site. Churchfields should not be designated as an employment area but as a mixed use area capable of providing housing. This would align with the Neighbourhood Plan for Salisbury and alleviate the pressure on greenfield land around Salisbury.
- **Retain WCS allocation:** The WCS allocation should be retained, with a phased approach to the delivery of housing and decant of employment uses, and utilising the site's proximity to the water meadows, town path, Harnham and cathedral views.
- **Compulsory purchase:** The council should use its land assembly powers (compulsory purchase, disposal of land in their ownership, powers to override easements) to enable the mixed-use redevelopment of the site. The PPG states that effectiveness of, and justification for, the use of these powers can be enhanced by having up-to-date plans, which articulate a vision and objectives for the future development of an area and policies to help achieve them. The Council has not been clear in explaining what tools they have tried to use to assemble the land at Churchfields to enable delivery of dwellings.
- **Transparency of contamination:** Insufficient evidence on the constraints perceived on the site / parts of the site have not been provided to justify the wholesale removal of the mixed allocation. An environmental impact study/assessment of ground contamination should be provided to assess soil contamination levels and provide recommendations for mitigation strategies.
- **Transport impact:** Concern that the policy approach fails to provide certainty that negative impacts of operations on the Churchfields site on the rest of Salisbury can be reduced. E.g., HGV traffic.

### Policy 35: Salisbury District Hospital campus

- **Lack of detail:** There is no detail about plans to regenerate the Salisbury Hospital site and therefore no opportunity to comment on issues relating to it.
- **Key worker accommodation:** Existing accommodation is insufficient to meet identified needs amongst current staff and will not be available to the new student population or newly recruited key workers. Evidence within the Salisbury HEAT Project: Vision and Masterplan 2023 update, provides a rationale for the provision of complementary accommodation as part of the Policy 35 allocation and HEAT project. Amendment to draft Policy 35 sought to include reference to the provision of accommodation for key workers and students. The ability of the Salisbury Foundation Trust to attract and retain staff and students will depend on the provision of high quality, affordable accommodation.

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- **Transport impact:** To avoid future uncertainty, National Highways recommend that restrictions on future development associated with traffic generation and car parking are clearly set out in Policy 35 rather than in supporting text, and that the restriction on traffic generation should be defined in terms of the traditional morning and evening commuter periods when the network is under greatest constraint.
- **National landscape impacts:** Concerns received with regards the impacts upon the national landscape given the sites proximity to this designation with criticism noted about the premature nature of the policy wording indicating that ‘Development will not have an unacceptable visual impact upon the character and appearance of the surrounding area’.

### Infrastructure Delivery Plan

- **Funding of transport infrastructure:** The improvements to transport infrastructure identified within the Plan rely heavily on developer contributions for funding which appears to fuel the reliance upon greenfield allocations at Salisbury.

### Transport evidence

- **Salisbury specific traffic counts:** The Transport Evidence Base from May 2023 resorts to county-wide projections rather than specific traffic counts for Salisbury, raising concerns about the accuracy of data. Additionally, the absence of recent counts in the evidence underlines potential gaps in the information provided.
- **Non car mode travel:** Wiltshire Council's expectation of a minimum 23% non car mode share across the county appears implausible, given the substantial reliance on cars to reach employment areas, especially for those commuting from rural or non-public transport-connected regions.

## Council response

### Housing and employment

Further information, including Council responses, in Table 3.17 provides strategic context on the decisions made, process and evidence informing the level and distribution of growth. The Planning for Salisbury<sup>93</sup> document then provides place specific information including the context and challenges for Salisbury alongside information relating to the key factors that have informed the distribution of growth, summarising information from a variety of evidence sources that informed this decision. For Salisbury, notwithstanding representing a Principal Settlement and focus for growth, this has included balancing growth needs against the need to conserve some of the county's most sensitive natural and built environments. Salisbury is a constrained historic settlement with significant development on the urban edge potentially impacting the city's setting and the settings to the Cathedral and Old Sarum Ancient Monument specifically. Areas around Salisbury are also rich in archaeological remains which have a strong likelihood to be of national importance. Opportunities to continue to expand are therefore

<sup>93</sup> [Planning for Salisbury](#), Wiltshire Council (September 2023)

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limited. Longer term, Salisbury will not be able to accommodate the scales of growth it had in the past. As a result, the scale of growth is set lower than the previous development plan and comparable with actual rates that have been achieved.

### Salisbury neighbourhood plan

Issues and considerations regarding housing requirements for the designated neighbourhood plan area are included in the Planning for Salisbury paper. It explains that, to set an appropriate scale of growth to be planned for through neighbourhood plans at the main settlements (Principal Settlements and Market Towns), a range of factors have been considered. These include the nature and extent of the area designation and what scope there is to identify sites for housing development. Scope to identify sites for housing development is limited at Salisbury as urban sites are not easily identifiable and opportunities for further outward expansion are becoming increasingly difficult to identify. 60 dwellings is therefore considered appropriate for the city as a neighbourhood area requirement.

### Infrastructure, constraints and site selection

The Planning for Salisbury document provides a host of information outlining how proposals for Salisbury have been established and informed by a variety of evidence sources. This includes outlining the challenges, constraints and local infrastructure considerations for Salisbury.

Appendix 2 of the Planning for Salisbury document also summarises the site selection process for Salisbury, outlining the findings from each stage. This includes detail on the pool of sites considered, the reasons for site removal via exclusionary criteria at stage 1 of site selection whilst also outlining the findings of stage 2 which further sifted sites based on a range of criteria. Following explanation as to whether any sites were then combined for further assessment, the document summarises the findings from sustainability appraisal and provides a table of sustainability appraisal key issues for sites assessed. Finally the findings of stage 4 are summarised. Stage 4 qualitatively examined the sites giving consideration to their capability of supporting the Local Plan's objectives for each community, in particular the identified 'Place Shaping Priorities' whilst also analysing the scale of growth that would be required to be drawn from the pool of the most sustainable site options to meet the identified housing and employment needs for the settlement.

### Policy 23: Land north east of Old Sarum

A Statement of Common Ground (SOCG) is underway with the site promoter of this allocation, Bloor Homes South West Limited, that will provide contextual information and focus on key issues relevant to the site. This will aim to provide commentary on any areas of disagreement as well as establish common ground on matters in principle. This will also contain housing trajectory information. To inform the examination process and assist the Inspector, SOCGs will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector. Key topic areas this SOCG will aim to cover include the requirement for an approved comprehensive masterplan prior to a planning application, status of the Concept Plan, potential archaeological and other heritage impacts and concerns over in-combination effects on site delivery from elevated Local Plan policy requirements.

### Policy 24: Land at Netherhampton Road Garden Centre

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The Council has identified a change for Policy 24 that it considers the examination process may wish to address. Proposed deletion of Policy 24 Land at Netherhampton Road Garden Centre which is no longer considered available for development. The SHELAA was originally submitted by the previous owner of the site, but the garden centre has since been sold on and the new owner wishes to continue running the business as a garden centre. A SOCG is not being pursued with the site owner.

### **Policy 25: Land north of the Beehive Park & Ride**

A Statement of Common Ground (SOCG) is underway with Pegasus Group on behalf of Redrow Homes, that will provide contextual information and focus on key issues relevant to the site. This will aim to provide commentary on any areas of disagreement as well as establish common ground on matters in principle. This will also contain housing trajectory information. To inform the examination process and assist the Inspector, SOCGs will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector. Key topic areas this SOCG will aim to cover include site capacity with regards the number of dwellings the site can accommodate, allocation boundary (potential to include an area of woodland adjacent to the site), policy requirement for PRoW outside the site promoter's control, self-build plots as shown on Concept Plan, requirement for allotments on site, justification for requirement for education contributions and the status and content of the Concept Plan.

### **Policy 26: Land North of Downton Road**

A Statement of Common Ground (SOCG) is underway with the site promoter of this allocation, Persimmon Homes South Coast Limited, that will provide contextual information and focus on key issues relevant to the site. This will aim to provide commentary on any areas of disagreement as well as establish common ground on matters in principle. This will also contain housing trajectory information. To inform the examination process and assist the Inspector, SOCGs will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector. Key topic areas this SOCG will aim to cover include the housing capacity of the site, the requirement for an approved comprehensive masterplan prior to a planning application, funding contributions towards air quality measures, funding contributions towards education and delivery of the SANG. The SOCG also includes information on SANG delivery which this allocation is required to deliver through Policy 29.

### **Policy 27: Land South of Harnham**

A Statement of Common Ground (SOCG) is underway with the site promoter of this allocation, Wyatt Homes, that will provide contextual information and focus on key issues relevant to the site. This will aim to provide commentary on any areas of disagreement as well as establish common ground on matters in principle. This will also contain housing trajectory information. To inform the examination process and assist the Inspector, SOCGs will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector. This SOCG includes Policy 28 Land West of Coombe Road as both allocations are being delivered by the same developer and are adjacent to one another. Key topics this SOCG will aim to cover include the requirement for an approved comprehensive masterplan prior to a planning application, status of the Concept Plan, prescriptive requirement for early years education provision, SANG delivery and requirement for self-build housing. The SOCG also includes information on SANG delivery which this allocation is required to deliver through Policy 29.

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Given the comments received on the location of the site in relation to the National Landscape, matters relevant to the site will also look to be covered within a SOCG that is being prepared between Wiltshire Council and the three National Landscape boards (Cotswold, Cranborne Chase and North Wessex Downs).

### **Policy 28: Land West of Coombe Road**

A Statement of Common Ground (SOCG) is underway with the site promoter of this allocation, Wyatt Homes, that will provide contextual information and focus on key issues relevant to the site. This will aim to provide commentary on any areas of disagreement as well as establish common ground on matters in principle. This will also contain housing trajectory information. To inform the examination process and assist the Inspector, SOCGs will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector. This SOCG includes Policy 27 Land South of Harnham as both allocations are being delivered by the same developer and are adjacent to one another. Key topics this SOCG will aim to cover include the requirement for an approved comprehensive masterplan prior to a planning application, status of the Concept Plan, requirement for provision of multiple play areas, requirement for provision of allotments and SANG delivery. The SOCG also includes information on SANG delivery which this allocation is required to deliver through Policy 29.

Given the comments received on the location of the site in relation to the National Landscape, matters relevant to the site will also look to be covered within a SOCG that is being prepared between Wiltshire Council and the three National Landscape boards (Cotswold, Cranborne Chase and North Wessex Downs).

### **Policy 29: Suitable Alternative Natural Greenspace, South Salisbury**

The proposed SANG has been identified to reduce the potential for visitor and recreational pressure and associated adverse effects on the New Forest designated sites that could arise from planned growth. The council is the competent authority under the Habitats Regulations and the SANG has been proposed taking into account advice received from Natural England. The planning authority must ascertain that allocations for residential development will not have an adverse effect on the integrity of the New Forest designated sites.

The Plan is subject to a Habitats Regulations Assessment (HRA) which sets out possible measures, including SANGs, to enable development to be delivered. The council has also produced a Recreation Mitigation Strategy for the New Forest Internationally Protected Sites which should be read in conjunction with Policy 29.

The role of the additional green space is to provide an alternative destination, with the objective of diverting visitors and recreational pressure away from the New Forest designated sites. Statements of Common Ground are being agreed with the site promoters of Salisbury site allocations that are required to deliver the SANG and these set out how the SANG is intended to be delivered and any topics for discussion with regards the SANGs. A SOCG is also being agreed with Natural England that will also look to cover matters in relation to SANG.

### **Policy 30: Land East of Church Road, Laverstock**

## Main issues: Salisbury Principal Settlement

A Statement of Common Ground (SOCG) is underway with the site promoters of this allocation, Hallam Land Management/Velcourt Group Ltd, that will provide contextual information and focus on key issues relevant to the site. This will aim to provide commentary on any areas of disagreement as well as establish common ground on matters in principle. This will also contain housing trajectory information. To inform the examination process and assist the Inspector, SOCGs will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector. The main topic covered in this SOCG relates to the policy requirement for delivery of a SANG and whether it is considered unnecessary for a development of 49 dwellings to provide SANG or whether a financial contribution could be required in accordance with the Interim Recreation Mitigation Strategy for the New Forest Internationally Protected Sites.

### **Policy 31: Salisbury Central Area**

The central area of Salisbury is strategically important, being the primary focus for retail and leisure activity that serves a broad hinterland. The city will be strengthened generally, but specifically as a centre of heritage, culture and tourism, to ensure that it remains relevant, is resilient to competition, and acts as an important driver of prosperity for the wider economy. Policy 31 aims to reposition Salisbury as a place that has a focus on heritage, culture and tourism, whilst continuing to encourage general economic investment. The success of the central area as a visitor destination and residential hub will be underpinned by fulfilling the place-shaping priorities connected with it. This includes delivering mixed-use opportunity sites, delivering the recommendations in the Salisbury Central Area Framework (CAF) and conserving and where possible enhancing heritage assets. Further information on the importance of Salisbury's central area, the CAF and specific regeneration opportunities – including The Maltings and Central Car Park, Churchfields and the railway station area – is included in the Planning for Salisbury paper.

### **Policy 33: Maltings and Central car park**

The Maltings and Central Car Park is a key regeneration and economic priority for the council. The Wiltshire Core Strategy allocation of the site planned its redevelopment to be predominantly retail-led, but in recent years, expansion of online shopping has meant that such a scheme has not been feasible. A revised masterplan for the Maltings and Central Car Park has been agreed for the site, which shifts the development focus more towards residential and leisure, in line with CAF recommendations for Salisbury city centre and working in tandem with the Salisbury River Park scheme.

Development should be underpinned by local design guides and in a manner that complements existing leisure and commercial provision. The allied Salisbury River Park Scheme provides essential infrastructure, flood risk alleviation and environmental improvements directly related to the Maltings and Central Car Park site, which will serve to support regeneration of the site and enable higher value development. Further information on the Maltings and Central Car Park site is included in the Planning for Salisbury paper.

### **Policy 34: Churchfields employment area**

Churchfields is the city's main employment area and enhancing access arrangements, incorporating more active forms of movement, and improving environmental quality will be key in bringing investment to this part of south Wiltshire. Churchfields is proposed to be identified as a Principal Employment Area within the Plan, where business uses will be supported, can evolve and diversify and opportunities taken to improve the environment. Previous aspirations to regenerate



## Main issues: Salisbury Principal Settlement

the site as a new neighbourhood for Salisbury have not been realised. Land contamination excludes wholesale redevelopment to residential uses as a viable future path and due to a complex number of land interests, shared between freehold and commercial leases, change will take the form of incremental adaptation over the plan period. The Plan therefore recognises the importance of the site as an employment area and seeks to support its evolution and diversification, which in turn will help regenerate the site and secure improvements.

An Estate Regeneration Plan and Accessibility Study will support opportunities to reduce harmful environmental impacts, including those on neighbouring areas, including HGV traffic and on-street parking, as well as enhance the attractiveness of the area to new investment. This will provide for improvements to access, the public realm, pedestrian and cycling facilities, traffic calming and the provision for parking.

### **Policy 35: Salisbury District Hospital campus**

Salisbury District Hospital plays a vital local and regional role. In addition to providing general hospital services, it also offers specialist services across the region and southern England. The ability of the hospital to operate efficiently and meet demand is constrained by the current estate and many of its buildings need to be replaced. Plans add new education, training and research capacity, alongside improved hospital facilities. By bringing education, training and technology together with health, it will have wider economic and community benefits. This policy provides a mechanism for the delivery of the Salisbury HEAT (Health, Education and Technology) project which is being promoted jointly by Salisbury NHS Foundation Trust (SFT) and Salutem Developments (the Partnership). The Partnership has been working on the Salisbury HEAT project since 2018 and engagement with a range of stakeholders has shaped a masterplan which has also been underpinned by an understanding of the need for proposed new facilities.

A SOCG is being agreed with the site promoters Salisbury NHS Foundation Trust and Salutem Developments that aims to provide further contextual information in relation to this site. Key issues this SOCG covers include the need for development to include accommodation for students and key workers and development of an expansion area to the current hospital site.

### 3.30 Main issues: Amesbury Market Town

Table 3.32 Local plan Amesbury Market Town main issues

Main issues: Amesbury Market Town
<p><b>Amesbury housing / employment</b></p> <ul style="list-style-type: none"><li>• <b>Allocations required and deliverable:</b> There are opportunities at Amesbury now to deliver development without the need to rely on a new community. The area of search for a new community encompasses land around Amesbury and yet no allocations are being pursued. Amesbury is a sustainable location to accommodate growth.</li><li>• <b>Justified approach:</b> Representors supported the position not to allocate land at Amesbury for allocation due to constraints, submitting evidence to this effect.</li><li>• <b>Housing number:</b> The housing number should be higher for Amesbury in reflection of its status as a market town and the suitability of the town to accommodate growth.</li><li>• <b>Small sites allowance:</b> This approach appears unjustified and relying on an unidentified supply via windfall should simply be to compliment housing supply as a buffer to meeting housing needs. It may also compromise affordable housing delivery due to the size of the sites coming forward potentially being less than 10 dwellings.</li><li>• <b>Employment need:</b> The policy for Amesbury is not positively prepared because it fails to allocate sufficient employment land at Amesbury to accord with the conclusions of the employment land review. Additional employment land needs to be identified to meet a broad range of employment needs, including the operational requirements of key service providers. Given the major employment site at Solstice Park, as well as the nationally significant aerodrome at Boscombe Down (amongst other sites), there is significant potential for further expansion, intensification and growth.</li></ul>
<p><b>Constrained settlement</b></p> <ul style="list-style-type: none"><li>• <b>Not constrained settlement:</b> The draft Plan places a new community area of search policy near Amesbury. On the one hand, the draft Plan defines Amesbury as one of the most sustainable locations for growth under the Settlement Hierarchy, but it is then considered a 'Constrained Settlement' under and is thus afforded no site-specific allocations. However, it is also placed at the centre of an area of search for a large number of homes, affected by broadly similar constraints. It is not justified to suggest Amesbury is not suitable to accommodate growth. Furthermore, such a stance would suggest an unsustainable indefinite constraint to growth at the settlement.</li><li>• <b>World Heritage Site evidence:</b> The local plan evidence base does not include heritage information, including the Stonehenge World Heritage Site Setting Study. The absence of this key piece of evidence for the Amesbury area is a fundamental omission of the plan.</li><li>• <b>Archaeology evidence:</b> There is no heritage evidence published that examines this theme in the published evidence base, nor is there any reference to other studies.</li></ul>
<p><b>Omission sites and site selection process</b></p>

## Main issues: Amesbury Market Town

A number of omission sites were promoted, including:

- Land at Viney's Farm (South West Amesbury), Land to east of Solstice Park (as employment opportunity), Land at London Road (site 1 / SHELAA 3379), Land south of Stockport Avenue, Land east of Idmiston Road (Porton).

These were, in part, accompanied by critique of the processes that had led to the sites not being allocated.

### High Post

- **Employment need at High Post:** There is a need for employment allocation(s) at High Post given Salisbury's / wider need. The employment land review confirms the suitability of the High Post location and yet the local plan has not taken this into consideration. Further clarification is needed as to whether development may be required in the Amesbury area should all the land at other locations be built out with clarity also required for the future extension at High Post principal employment area, when evidence as presented appears to suggest that it is too constrained, particularly by landscape and heritage.

### Place shaping priority

- **Town centre strategy:** Clarity required with regards the intentions for the collaborative preparation and implementation of this document as this is not provided by the policy or supporting text.

### Policy 37: Boscombe down

- **Sustainability, deliverability and alternatives:** The plan strategy should ensure that a wider range of sites for general employment and commercial purposes are made available, including ensuring such opportunities create jobs for local people. The allocated MOD land at Boscombe Down (Policy 37) has not been developed in the last 27 years and there is no evidence to suggest that it will be developed during the period to 2040 - the policy is therefore unlikely to be effective. The decision to identify land at Boscombe Down for further employment development, for instance, conflicts with the landscape and heritage reasons why the council has chosen not to allocate land to the east of Solstice Park.
- **Detail on amount of development:** A quantum of development is not provided in terms of what might be appropriate during the plan period.
- **Transport impact and freight management:** The consequence of expanding the business element of the site is likely to increase the volume of freight traffic onto the A345 and A303 and increase congestion, transport impacts made worse if job creation exacerbates commuting. A fully operation Freight Management Strategy needs to be in place with active management.
- **Duty to Cooperate:** Given this policy is a new policy for Boscombe Down, it would have been preferable for Wiltshire Council to have consulted and worked collaboratively with the MOD in its formulation.

### Policy 38: Porton Down

- **Sustainability and alternatives:** The plan strategy should ensure that a wider range of sites for general employment and commercial purposes are made available, including ensuring such opportunities create jobs for local people. The decision to support an expansion of employment development at Porton

## Main issues: Amesbury Market Town

Down conflicts with the need to allocate land for development at the most sustainable locations and reduce the need to travel, optimising sustainable transport, given the isolated nature of Porton Down. Other more sustainable locations are available.

- **Housing need:** Given the significance of the employment offer at this location, housing should be considered near the site to optimise the sustainability of the housing options for those working on site.
- **Detail on amount of development:** A quantum of development is not provided in terms of what might be appropriate during the plan period.
- **Transport impact and freight management:** The consequence of expanding the business element of the site is likely to increase the volume of freight traffic onto the A345 and A303 and increase congestion, transport impacts made worse if job creation exacerbates commuting. A fully operation Freight Management Strategy needs to be in place with active management.
- **Special Protection Area:** The requirement to protect the nearby SPA, an important caveat to the continued development at Porton, should be included within Policy 38.

## Council response

### Housing and employment

Further information, including Council responses, in Table 3.17 provides strategic context on the decisions made, process and evidence informing the level and distribution of growth. The Planning for Amesbury<sup>94</sup> document then provides place specific information including the context and challenges for Amesbury alongside information relating to the key factors that have informed the distribution of growth, summarising information from a variety of evidence sources that informed this decision. For Amesbury opportunities for expansion of the Market Town of Amesbury are limited by the need to preserve the setting of the Stonehenge World Heritage Site and the archaeological importance of much of the town's surrounding area. This has impacted on the ability to expand the Solstice Park Principal Employment Area.

Amesbury is a significantly constrained settlement, and scales of growth through the Plan are therefore reduced from previous rates. Beyond existing provision for new homes, and the existing stock of employment land, additional allocations are very difficult to identify. It is likely that strategic future housing and employment will need to rely on the possibility of a new community to help meet needs in the longer term. The Plan supports further employment growth at Porton Down, located in the rural area to the south east of Amesbury as well as Boscombe Down, as strategically important specialist employment hubs.

### Infrastructure, constraints and site selection

The Planning for Amesbury document provides a host of information outlining how proposals for Amesbury have been established and informed by a variety of evidence sources. This includes outlining the challenges, constraints and local infrastructure considerations for Amesbury.

<sup>94</sup> [Planning for Amesbury](#), Wiltshire Council (September 2023)

## Main issues: Amesbury Market Town

Appendix 2 of the Planning for Amesbury document also summarises the site selection process for Amesbury, outlining the findings from each stage. This includes detail on the pool of sites considered, the reasons for site removal via exclusionary criteria at stage 1 of site selection whilst also outlining the findings of stage 2 which further sifted sites based on a range of criteria. Following explanation as to whether any sites were then combined for further assessment, the document summarises the findings from sustainability appraisal and provides a table of sustainability appraisal key issues for sites assessed. Finally the findings of stage 4 are summarised. Stage 4 qualitatively examined the sites giving consideration to their capability of supporting the Local Plan's objectives for each community, in particular the identified 'Place Shaping Priorities' whilst also analysing the scale of growth that would be required to be drawn from the pool of the most sustainable site options to meet the identified housing and employment needs for the settlement.

The outcome of the site selection process demonstrates that opportunities for expansion of Amesbury and development at High Post is limited, particularly by the need to preserve the settings of the Stonehenge World Heritage Site, the Old Sarum hillfort scheduled monument, and the archaeological importance of much of Amesbury's surrounding area.

No sites have been identified for development at Amesbury or High Post over the Local Plan period. The available sites identified at Amesbury and High Post were found to be subject to insurmountable negative impacts making them unsuitable for allocation.

### **Policy 37: Boscombe down**

The draft Local Plan is supported by the Wiltshire Employment Land Review which identifies the scale of need for employment land over the Local Plan period. No sites are allocated for employment land at Amesbury, reflecting the fact that there are no available sites which could accommodate the indicative level of needs. However, the Local Plan recognises the importance of Boscombe Down and the potential for future investment in the site. In addition, in the wider Amesbury area, the Local Plan also continues to set out policy support for the development of research and development premises for the nationally important biosciences sector at Porton Down; and employment uses at High Post continue to be supported.

Boscombe Down aerodrome is a nationally significant military testing site owned by the Defence Infrastructure Organisation and operated by QinetiQ on behalf of the Ministry of Defence. The site is a major employer in the local area, making an important contribution to South Wiltshire's economy. Part of the Boscombe Down site is allocated as a Principal Employment Area in the Wiltshire Core Strategy, a saved policy from the Salisbury District Plan. The need to preserve the operational capabilities of activities at Boscombe Down is an important consideration for plan-making in and around Amesbury.

The Principal Employment Area also includes a saved employment allocation, however, to date the allocation has not been delivered. The Local Plan policy review concluded that the saved policy was no longer fit for purpose and therefore proposes to remove the saved allocation and Principal Employment Area. The policy is proposed to be replaced by a broader policy relating to the wider Boscombe Down airfield site, which sets out general support for development on the site to enable expansion and intensification of uses to support the site's strategically vital role as an employment area (Policy 37). This is explained within the Planning for Amesbury paper.

### **Policy 38: Porton Down**

### Main issues: Amesbury Market Town

As set out in the Planning for Amesbury paper, Porton Down is a highly valued strategically important site for expanding internationally important scientific research and development in the UK. The site is important to South Wiltshire's economy, and it is expected to continue to play an important economic role through the Local Plan period. Porton Down is allocated as a Principal Employment Area in the Wiltshire Core Strategy, and this is proposed to be carried forward within the Local Plan.

The expansion of Porton Down through further development of the Porton Down Science Park is ongoing, led by the Porton Down Masterplan SPD (2007) which sets a framework of development principles designed to promote the delivery of a bioscience-led business incubation facility. To date, half of the site is developed, and the remainder of the site is expected to be delivered within the Local Plan period. The Masterplan would benefit from review as it is now some years old to ensure that the remainder of the site and the evolving plans and needs of occupiers can be met in a manner which is fit for the future, particularly to meet the needs of bioscience research in a post-pandemic world.

Porton Down is situated close to internationally designated Special Protection Area, a Special Area of Conservation and a Site of Special Scientific Interest. The Council will continue to work closely with the Porton Down scientific community, Natural England, and appropriate conservation bodies to avoid potentially adverse effects of known future business development upon Natura 2000 designations.

## Main issues: Tidworth and Ludgershall Market Town

Table 3.33 Local plan Tidworth and Ludgershall Market Town main issues

Main issues: Tidworth and Ludgershall Market Town
<p><b>Tidworth and Ludgershall housing / employment</b></p> <ul style="list-style-type: none"> <li>• <b>Unconstrained settlement / optimising growth:</b> As the only Main Settlement in the Salisbury HMA not a 'Constrained Settlement', optimising growth in this location is fundamental to the delivery strategy given the reduced levels of supply at the HMA, compared to needs identified by ONS.</li> </ul>
<p><b>Omission sites and site selection process</b></p> <p>A number of omission sites were promoted, including:</p> <ul style="list-style-type: none"> <li>• Land east of Ludgershall within Test Valley Borough Council was promoted as a cross-boundary plan-led solution for growth.</li> </ul> <p>These were, in part, accompanied by critique of the processes that had led to the sites not being allocated.</p>
<p><b>Place shaping priority</b></p> <ul style="list-style-type: none"> <li>• <b>Railway as sustainable transport option:</b> Note, the MOD own this and, as a key stakeholder, require to be kept informed and included in discussions about the possible use of this resource.</li> </ul>
<p><b>Cross boundary matters</b></p> <p><b>Requirement for cross boundary working:</b> Given the proximity of development at Tidworth/Ludgershall to Test Valley Borough Councils administrative area, and cross boundary matters with regards a number of constraints and infrastructure matters, ongoing collaborative working is welcomed. Para 4.198 should be clarified that any future need to further expand the town into Test Valley will be a matter for determination by the Test Valley local plan process.</p>
<p><b>Policy 40: Land South East of Empress Way</b></p> <ul style="list-style-type: none"> <li>• <b>Constraints:</b> Representors outlined the site as unsuitable for development based on factors including lack of services nearby owing to the relative size of Ludgershall, and the need for better permeability of the site by accessible means.</li> <li>• <b>Utilities, amenity and infrastructure:</b> Representors suggested clarification of the policy based on factors including the need to engage with Southern Water about wastewater treatment works, the need or otherwise of a buffer due to odour, evidence and need for education provision and contributions, size and location of local centre, need or otherwise of contamination assessment, and need or otherwise on the need to design to avoid noise impacts.</li> <li>• <b>Southern link road / phasing:</b> The timing for the trigger point for the delivery of the southern link road is unclear, as is the consequent implication for proposed phasing of delivery of the allocation, including the element reliant upon the link road. Concerns were raised that the costs and feasibility of the link road into Hampshire have not been tested.</li> </ul>

## Main issues: Tidworth and Ludgershall Market Town

- **Cross boundary reliance:** Concern that the allocation is reliant on cross boundary infrastructure which the Local Plan cannot secure, as it relies on delivery in an adjoining authority area.
- **Cross boundary transport impacts:** The evidence must demonstrate that the flow of traffic on the A342 is not compromised and this must have regard to Policy DM2 (i) of Hampshire's LTP4.
- **Crossing of Andover to Ludgershall MoD freight branch railway:** The policy and supporting text fails to note that to connect the site to the A342 a new crossing of the Andover to Ludgershall MoD freight branch railway line would be required. The policy should include the requirement for the development to fund/provide the railway crossing.
- **Strategic road network:** The policy should be amended to include specific reference to SRN impacts and mitigation needs as per National Highways representation.
- **Level crossing use:** The policy does not account for level crossing over the railway. The potential increase in usage of these crossings presents a safety concern, especially if increased use of the Ludgershall branch line is encouraged. Whilst the school site sits outside the policy area boundary, its location would act as an attractor for increased use of the crossings along this section of the railway line.
- **Species / ecology:** The policy should require as far as possible the maintenance of populations (reference to lapwing and skylark and the area safeguarded for these species which was supported) within areas of green infrastructure retained onsite and where necessary unavoidable losses should be compensated through the provision of agreed long term offsite conservation measures as per Natural England representation.
- **Lapwing and skylark area:** Land to the southeast of SHELAA site 555 should not be excluded from the allocation area, as it is no longer required to provide offsite mitigation for lapwing and skylark populations associated with the adjoining site at Empress Way. This land should be shown on the concept plan as accessible natural green space /biodiversity net gains associated with the Local Plan allocation site.
- **Landscape and open space mitigation:** Mitigation does not accord with the Wiltshire Site Landscape Appraisal of the site and should be amended. Transition of urban development to the wider Downs landscape is recommended to be achieved through strategic green spaces, grassland and woodland. The provision of allotments should be reduced to reflect Wiltshire Open Space Assessment Update.
- **Viability:** Concern voiced about viability of the scheme given the affordable housing threshold, infrastructure and mitigation requirements.

## Council response

### Housing and employment



## Main issues: Tidworth and Ludgershall Market Town

Further information, including Council responses, in Table 3.17 provides strategic context on the decisions made, process and evidence informing the level and distribution of growth. The Planning for Tidworth and Ludgershall<sup>95</sup> document then provides place specific information including the context and challenges for Tidworth and Ludgershall alongside information relating to the key factors that have informed the distribution of growth, summarising information from a variety of evidence sources that informed this decision. Due to the lack of available sites at Tidworth, the strategy for growth in this area is focused on Ludgershall with one strategic allocation site at Ludgershall (Policy 40 – Land South East of Empress Way).

The proposed strategy for growth at Ludgershall recognises of the geographic relationship that Ludgershall has with the adjoining authorities of Test Valley Borough Council and Hampshire County Council, who Wiltshire Council have worked collaboratively with, fulfilling the Duty to Cooperate. A Statement of Common Ground (SOCG) is being prepared with these two authorities in relation to cross boundary strategic matters including Land South East of Empress Way which will confirm ongoing commitment between the parties towards the delivery of the site, including its associated cross boundary highway and transport infrastructure requirements that fall within the adjoining authority areas.

### Infrastructure, constraints and site selection

The Planning for Tidworth and Ludgershall document provides a host of information outlining how proposals for Ludgershall have been established and informed by a variety of evidence sources. This includes outlining the challenges, constraints and local infrastructure considerations for Tidworth and Ludgershall.

Appendix 2 of the Planning for Tidworth and Ludgershall document also summarises the site selection process for Tidworth and Ludgershall, outlining the findings from each stage. This includes detail on the pool of sites considered, the reasons for site removal via exclusionary criteria at stage 1 of site selection whilst also outlining the findings of stage 2 which further sifted sites based on a range of criteria. Following explanation as to whether any sites were then combined for further assessment, the document summarises the findings from sustainability appraisal and provides a table of sustainability appraisal key issues for sites assessed at Ludgershall (with all sites at Tidworth having been ruled out at the early stages due to their lack of availability). Finally the findings of stage 4 are summarised. Stage 4 qualitatively examined the sites giving consideration to their capability of supporting the Local Plan's objectives for each community, in particular the identified 'Place Shaping Priorities' whilst also analysing the scale of growth that would be required to be drawn from the pool of the most sustainable site options to meet the identified housing and employment needs for the settlement.

### Policy 40: Land South East of Empress Way

A SOCG is underway with the developer / landowner that will provide contextual information and focus on key issues relevant to the site. The SOCG will aim to provide commentary on any areas of disagreement as well as establish common ground on matters in principle. This will also contain housing trajectory information. To inform the examination process and assist the Inspector, the SOCG will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector. Key topic areas this SOCG will aim to cover include matters relating to cross party working between the two landowners of the site, the treatment of the lapwing and skylark mitigation area, matters relating to landscape, ecology and delivery of critical infrastructure (including highway and transport infrastructure and education facilities).

<sup>95</sup> [Planning for Tidworth and Ludgershall](#), Wiltshire Council (September 2023)

### **Main issues: Tidworth and Ludgershall Market Town**

Recognising that the delivery of the site allocation relies on significant highways infrastructure coming forward (a new road connection and rail bridge within Hampshire/Test Valley, and upgrades to existing junctions in Wiltshire), Wiltshire Council is undertaking further work to address trigger points for the delivery of infrastructure.

## Main issues: Salisbury rural area

Table 3.34 Local plan Salisbury rural area main issues

Main issues: Salisbury rural area
<p><b>Policy 41 Land at Bulbridge Estate, Wilton</b></p> <ul style="list-style-type: none"><li>• N/A</li></ul>
<p><b>Policy 42 Land at Dead Maid quarry employment area, Mere</b></p> <ul style="list-style-type: none"><li>• <b>Consideration of the Cranborne Chase Area of Outstanding Natural Beauty (AONB):</b> Due to the site's close proximity to the Cranborne Chase AONB, it is important the policy reflects the need for development to be delivered in a manner which is sensitive to it's location close to the Cranborne Chase National Landscape with provision being made for necessary compensation of impacts.</li></ul>
<p><b>Policy 43 Land safeguarded for education at Tanner's Lane, Shrewton</b></p> <ul style="list-style-type: none"><li>• <b>Education need:</b> The need for the safeguarded land was questioned with it being believed there is capacity at the existing education facilities to accommodate predicted growth.</li></ul>

### 3.2.6 Main issues: Local Plan section 4 (Swindon HMA)

- 3.31** Presented below are the main issues raised by the representations with regards Local Plan section 4 focusing upon the strategy for the Swindon HMA, namely:
- Strategy for the Swindon HMA
  - Marlborough Market Town
  - Royal Wootton Bassett Market Town
- 3.32** Within the table for each place are the main issues raised for all policies associated with that place. For instance, the Marlborough market town table will contain main issues for policy's 44 (Marlborough market town), 45 (Land at Chpping Knife Lane) and 46 (Land off Barton Dene).
- 3.33** Where representations have presented issues as per those reported against sections 1-3 of the draft Plan, these have not been repeated against these place specific policies. However, in some instances further place specific detail may be provided. Please refer to the main issues presented against sections 1-3 of the draft Plan to understand these overarching plan wide matters.
- 3.34** Given the overlap between the comments for the strategy for all the rural areas, these main issues have been presented in one table covering topics relevant to the strategy for all rural areas after the presentation of main issues for each HMA.

### Main issues: Strategy for the Swindon HMA

Table 3.35 Local plan Strategy for the Swindon HMA main issues and Council response

Main issues: Strategy for the Swindon HMA	
<b>Level of growth</b>	<ul style="list-style-type: none"><li>• <b>Housing requirement for Royal Wootton Bassett should be higher:</b> The level of housing for the Swindon HMA does not adequately consider the sustainability of Royal Wootton Bassett to accommodate strategic and non-strategic levels of growth to meet further housing needs and to support existing facilities and services. There is a need to increase the housing requirement in the Plan from the Standard Methodology derived figure and respond to local needs.</li><li>• <b>Increase housing requirement figure for Swindon rural area / outside of market towns:</b> The level of housing identified for the Swindon HMA does not adequately take into consideration the sustainability of locations in the rural area (e.g., Cricklade, Lyneham, Purton) to accommodate growth to meet future housing needs and to support existing facilities and services. The Local Plan Review should take a positive approach to resolving infrastructure capacity and delivery issues in rural areas.</li></ul>

## Main issues: Strategy for the Swindon HMA

### Swindon and west of Swindon

- **The Spatial Strategy should consider Swindon / West of Swindon and allocate sites:** The Spatial Strategy is premised on a flawed assumption that there is no need for additional sites on the western edge of Swindon as Swindon is meeting its own needs and has not assessed this as a location for growth. This fails to recognise the development opportunities at the western edge of Swindon, a sustainable location for growth. Basing the delivery strategy on the assumption that there is no requirement to consider development opportunities on the western edge of Swindon is a flawed approach and is inconsistent with national policy and not justified. Development opportunities exist to deliver sustainable growth in this location.

### Omission sites and site selection process

A number of omission sites were promoted, including:

- Additional TOF Land to the West of Royal Wootton Bassett, Land at Godby's Farm (Cricklade), Land at South Pavenhill Farm (Purton), Land at Pavenhill (Purton), Land at Green Farm (Lyneham), Land at The Pry, Washpool (West of Swindon), Land north of The Elms (West of Swindon), Land at Seven Bridges (A419, Swindon).

These were, in part, accompanied by critique of the processes that had led to the sites not being allocated.

## Council response

### Level and distribution of growth

Further information, including Council responses, in Table 3.17 provides strategic context on the decisions made, process and evidence informing the level and distribution of growth. The Planning for Marlborough<sup>96</sup> and Planning for Royal Wootton Bassett<sup>97</sup> documents provide place specific information including the context and challenges for each place alongside summaries relating to the key factors that have informed the distribution of growth for each place, summarising information from a variety of evidence sources informing these decisions.

Of the two Market Towns within the Wiltshire part of the Swindon Housing Market Area, referred to as the Swindon Area, Royal Wootton Bassett is much less constrained than Marlborough, which is located within the North Wessex Downs National Landscape. Royal Wootton Bassett therefore continues to be a focus for growth. Marlborough is a constrained settlement and its outward expansion is limited by the need to conserve and enhance the special character of the National Landscape.

### Duty to Cooperate

<sup>96</sup> [Planning for Marlborough](#), Wiltshire Council (September 2023)

<sup>97</sup> [Planning for Royal Wootton Bassett](#), Wiltshire Council (September 2023)

### **Main issues: Strategy for the Swindon HMA**

Information on cooperation with Swindon can be found within the prescribed bodies and neighbouring authorities section of this report alongside the Statement of Common Ground with this neighbouring authority.

## Main issues: Marlborough Market Town

Table 3.36 Local plan Marlborough Market Town main issues and Council response

Main issues: Marlborough Market Town
<p data-bbox="96 323 600 360"><b>Marlborough housing / employment</b></p> <ul data-bbox="96 379 2132 906" style="list-style-type: none"><li data-bbox="96 379 2132 523">• <b>Housing / employment figure too high / unjustified:</b> Housing / employment growth figure is too high / unjustified. This arbitrary split around the county of growth does not reflect the cumulative and individual impacts of development or the individual characteristics and constraints of each town. This is not reflective of the constrained nature of the settlement. With regards employment need, representors suggested this was unjustified with prior supposed need indicated within the Wiltshire Core Strategy never coming forward.</li><li data-bbox="96 531 2132 603">• <b>Small site allowance achievability, accuracy and reliance:</b> Challenge to small site allowance being achievable, accurate and something to rely on for housing delivery. The Local Plan does not explain how this number was chosen or on what evidence it was based (110 for Marlborough).</li><li data-bbox="96 611 2132 754">• <b>Distribution of growth not appropriate / too low for Swindon HMA/Marlborough:</b> Given problems with housing delivery in Royal Wootton Bassett and rural nature of rest of HMA, it is not appropriate to reduce proportion proposed at Marlborough. Similarly the revised spatial strategy appears to distribute a small level of growth to Swindon HMA. Housing Needs Assessments suggest increased housing need within Swindon HMA which, coupled with Marlborough's high house prices indicate more housing should be allocated to the Swindon HMA and Marlborough.</li><li data-bbox="96 762 2132 906">• <b>Affordable housing need:</b> There is an affordable housing need in Marlborough with house prices high at the town. However, allocations within the Local Plan have not suitably satisfied this need which will both fail to meet affordable housing need and further worsen the affordability situation. Other representors indicated, however, that affordable housing need at the town is not as high as suggested with a surplus of affordable homes and many not being made available to locals.</li></ul>
<p data-bbox="96 943 474 979"><b>Infrastructure / constraints</b></p> <ul data-bbox="96 999 2132 1374" style="list-style-type: none"><li data-bbox="96 999 2132 1142">• <b>National landscape impacts: Unjustified / unsuitable development within National Landscape:</b> The level of growth and site allocations at Marlborough are unsound proposals as it is not in conformity with national policy and other policies within the Local Plan itself in terms of the need to conserve the National Landscape. The approach to develop to such an extent into the National Landscape appears unjustified and / or not positively prepared and no exceptional circumstances have been outlined.</li><li data-bbox="96 1150 2132 1254">• <b>Road network:</b> Concerns regarding the capacity of the road network / infrastructure to deal with the planned growth were raised. Some reported the network is already susceptible to severe traffic congestion given the town sits on a crossroads between the A4 and the A346 (congestion possibly heightened when the improved link to the M5 via the A419 is completed).</li><li data-bbox="96 1262 2132 1374">• <b>Sewage treatment works capacity:</b> Concerns were raised about the capacity for sewage treatment works to cope with additional growth. Some respondents reported the services already being at capacity with foul treatment plant(s) / Thames Water undertaking many unauthorised free discharges of untreated black water into the Kennet each year.</li></ul>

## Main issues: Marlborough Market Town

- **Waste water capacity [comments made applicable to both development sites]:** Marlborough STW discharges into the Middle Kennet WFD waterbody (current status at Good or High), which is at the head of the River Kennet SSSI. New development could have a significant effect on the water quality in the SSSI. It must not be allowed to deteriorate due to additional nutrient loading from the STW. Latest compliance figures suggest that Marlborough STWs have very little headroom for additional flows from new development. [Environment Agency] would not support any additional development within the STW catchment until a new permit is in place. A water cycle study is required. Without this, the associated risks of developing in the Marlborough Sewage Treatment Works (STW) catchment (and Hampshire Avon) have not been adequately assessed.
- **Water supply upgrades required [comments made applicable to both development sites]:** The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure.
- **Air quality:** Concerns regarding the impact of development on air quality. The draft plan does not appear clear how the impact of planned growth has been tested in air quality terms?

### Neighbourhood planning

- **Ignores Marlborough Area Neighbourhood Plan and Preshute Neighbourhood Plan:** Proposals at Marlborough have ignored and overridden the findings and content of the Marlborough Area Neighbourhood Plan and Preshute Neighbourhood Plan. When preparing the Marlborough Area Neighbourhood Plan both land at Chopping Knife Lane (following objections from residents) and Land at Barton Dene (objections) were not allocated through the Neighbourhood Plan process.
- **Housing and employment growth different to that suggested the Marlborough Area Neighbourhood Plan needed to meet:** The scale of growth within the Local Plan is not consistent, and higher, than that suggested the Marlborough Area Neighbourhood Plan should meet for both housing and employment.

### Policy 45: Land at Chopping Knife Lane

- **Unsuitable for development:** Representors outlined the site as unsuitable for development / raised concerns based on factors including sewage treatment works capacity, road network capacity (White Horse Road and the junction with A4), access concerns (access not suitable / safe), poor pedestrian connectivity to services and facilities, impacts upon Grade II listed Elcot Mill and stables, healthcare and education capacity to accommodate development.
- **River Kennet SSSI:** Concerns about the impacts upon the River Kennet SSSI (including potential wastewater discharges into the river) and its associated biodiversity given the proximity of the site to the SSSI designation.
- **National Landscape justification of development:** There needs to be a clear justification as to how the exceptional circumstance tests have been met. A key consideration will be the extent to which landscape impacts on the can be moderated. Some representors outlined the development, within a valley landscape, as being unsuitable and contrary to the need to conserve and enhance National Landscapes with development of this site not being acceptable and / or it not being possible to provide sufficient landscape mitigation.

### Policy 46: Land off Barton Dene



## Main issues: Marlborough Market Town

- **Housing capacity:** It was suggested that the policy should be flexible on the number of homes with the capacity of the site being higher than that indicated within the draft Plan.
- **Unsuitable for development:** Representors outlined the site as unsuitable for development / raised concerns based on factors including sewage treatment works capacity, road network capacity (access to / from A4 and associated congestion), poor pedestrian connectivity to services and facilities and safety concerns, healthcare and education capacity to accommodate development, not suitable for employment development.
- **Access not suitable:** Comments outlined the road through Barton Park and College Fields is a small estate road and unsafe for the allocation whilst the road up Barton Dene past the leisure Centre is narrow and steep sided. Access via Barton Dene, a narrow road adjacent to listed buildings, was also questioned in terms of suitability.
- **Need for greater policy flexibility in delivering employment land:** The higher end of the range of office need in Marlborough is being provided for in the emerging Local Plan ad allocated at Barton Dene. In the event that demand for this upper figure is not realised, sufficient flexibility should be provided in the planning policies to allow consideration of an alternative configuration/ balance of uses.
- **National Landscape justification of development:** There needs to be a clear justification as to how the exceptional circumstance tests have been met. A key consideration will be the extent to which landscape impacts on the can be moderated. Some representors outlined the development, within the National Landscape with high and varying elevations, as being unsuitable and contrary to the need to conserve and enhance National Landscapes with development of this site not being acceptable and / or it not being possible to provide sufficient landscape mitigation. The policy takes a negative approach to hide development via landscape mitigation, in an area characterised by open landscape.

### Infrastructure Delivery Plan

- **Water supply infrastructure requirements:** The Infrastructure Delivery Plan (IDP) includes a section of Water at Appendix 1d with a range of anticipated projects by settlement but does not contain any information relating specifically to Marlborough despite the draft Plan indicating upgrades are required. It is suggested any necessary upgrades to infrastructure that are planned/required in Marlborough to accommodate future anticipated growth and their anticipated delivery is reflected within the IDP.

## Council response

### Housing and employment

Further information, including Council responses, in Table 3.17 provides strategic context on the decisions made, process and evidence informing the level and distribution of growth. The Planning for Marlborough<sup>98</sup> document then provides place specific information including the context and challenges for Marlborough alongside information relating to the key factors that have informed the distribution of growth for Marlborough, summarising information from a

<sup>98</sup> [Planning for Marlborough](#), Wiltshire Council (September 2023)

## Main issues: Marlborough Market Town

variety of evidence sources that informed this decision. For Marlborough this has included striking a balance between growth needs and the need to conserve the environment Marlborough sits within, namely the North Wessex Downs National Landscape, a constraint that has been factored in to both the distribution of growth and selection of sites.

Development opportunities have been considered in part by work on a neighbourhood plan for the town, which identifies land for 65 homes over the period to 2036. A scale of growth for the town is set, as well as the need to provide additional homes to support affordable housing delivery and employment land over the Plan period to supplement this. The overall scale of growth is slightly lower than the previous plan.

### **Infrastructure, constraints and site selection**

The Planning for Marlborough document provides a host of information outlining how proposals for Marlborough have been established and informed by a variety of evidence sources. This includes outlining the challenges, constraints and local infrastructure considerations for Marlborough.

Appendix 2 of the Planning for Marlborough document also summarises the site selection process for Marlborough, outlining the findings from each stage. This includes detail on the pool of sites considered, the reasons for site removal via exclusionary criteria at stage 1 of site selection whilst also outlining the findings of stage 2 which further sifted sites based on a range of criteria. Following explanation as to whether any sites were then combined for further assessment, the document summarises the findings from Sustainability Appraisal and provides a table of sustainability appraisal key issues for sites assessed. Finally the findings of stage 4 are summarised. Stage 4 qualitatively examined the sites giving consideration to their capability of supporting the Local Plan's objectives for each community, in particular the identified 'Place Shaping Priorities' whilst also analysing the scale of growth that would be required to be drawn from the pool of the most sustainable site options to meet the identified housing and employment needs for the settlement.

### **Policy 45: Land at Chopping Knife Lane**

A Statement of Common Ground (SOCG) is underway with the site promoter WSP Representing The Crown Estate that will provide contextual information and focus on key issues relevant to the site. This will aim to provide commentary on any areas of disagreement as well as establish common ground on matters in principle. This will also contain housing trajectory information. To inform the examination process and assist the Inspector, SOCGs will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector. Key topic areas this SOCG will aim to cover include site landscaping, the potential / manner through which the site may deliver environmental mitigation / enhancements and infrastructure delivery.

Given the location of the site within the National Landscape, and comments received, matters relevant to the site will also look to be covered within a SOCG that will be prepared with Natural England and a SOCG that is being prepared between Wiltshire Council and the three National Landscape boards (Cotswold, Cranborne Chase and North Wessex Downs).

### **Policy 46: Land off Barton Dene**

### Main issues: Marlborough Market Town

A Statement of Common Ground (SOCG) is underway with Marlborough College that will provide contextual information and focus on key issues relevant to the site. This will aim to provide commentary on any areas of disagreement as well as establish common ground on matters in principle. This will also contain housing trajectory information. To inform the examination process and assist the Inspector, SOCGs will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector. Key topic areas this SOCG will aim to cover include the delivery of the site taking into consideration the infrastructure and mitigation requirements set out in Policy 46 alongside the quantum of development and the delivery of employment on the site.

Given the location of the site within the National Landscape, and comments received, matters relevant to the site will also look to be covered within a SOCG that will be prepared with Natural England and a SOCG that is being prepared between Wiltshire Council and the three National Landscape boards (Cotswold, Cranborne Chase and North Wessex Downs).

## Main issues: Royal Wootton Bassett market town

Table 3.37 Local plan Royal Wootton Bassett market town main issues and Council response

Main issues: Royal Wootton Bassett market town
<p><b>Royal Wootton Bassett housing / employment</b></p> <ul style="list-style-type: none"><li>• <b>Housing and employment growth should be higher:</b> The plan fails to meet the needs identified for the Swindon HMA in terms of housing and employment need. The employment land review clearly identifies a higher need within the Swindon FEMA area, this is an unsustainable and not positively prepared strategy and does not assist in resolving out commuting.</li><li>• <b>Employment growth too high:</b> RWB is expected to accommodate a significantly higher proportion of Wiltshire's employment growth than its housing growth. The draft Local Plan and evidence base does not provide an explanation or any reasoning behind this imbalance. The quantum of employment planned to be delivered at RWB is higher than the identified need in the Employment Land Review (ELR). The ELR also indicates that priority should be given to the provision of industrial land in RWB, with 4.1ha of employment land delivered to be developed for industrial purposes, and just 0.8-2.1ha required for office development.</li><li>• <b>Economic potential / influence of Swindon / Junction 16:</b> The economic strategy for the market town is focused upon immediate edge of settlement locations but is silent on the locational advantage of the RWB catchment for economic growth associated with the M4 Junction 16 area. The draft Plan appears to ignore the potential contribution by this strategic location.</li><li>• <b>Strategy not ambitious / fragmented and doesn't deliver required infrastructure at the town:</b> The strategy for growth does not set out an ambitious future plan for the town and is not coordinated to deliver the infrastructure that the town requires, such as enhanced transport infrastructure. Instead it will add to existing infrastructure constraints. Some representors suggested they also go against the aspirations of the place shaping priorities and the Neighbourhood Plan.</li><li>• <b>Housing growth too high:</b> Some representors indicated that, in the absence of a strategy aimed at infrastructure enhancements for the town, the housing number was too high for the existing infrastructure to cope with.</li></ul>
<p><b>Infrastructure / constraints</b></p> <ul style="list-style-type: none"><li>• <b>Transport network constraints [applicable to all site allocations / planned growth]:</b> Concerns the A3102 through the town is congested and will not cope with proposed levels of growth. As a result of this, it was suggested rat running through the roads around the town and through surrounding villages is also worsening and needs to be taken into consideration to ensure planned levels of growth can be safely accommodated. Concerns were also voiced about the ability of Junction 16 of the M4 to cope with the planned additional growth.</li><li>• <b>Healthcare and education system [applicable to all site allocations / planned growth]:</b> Representors raised concerns regarding the capacity of the healthcare and education system to cope with planned growth at the town whilst also citing concern about the timing and delivery of such infrastructure.</li></ul>

## Main issues: Royal Wootton Bassett market town

Clear delivery and funding mechanisms were not present. There is no land set aside for the expansion or provision of new healthcare facilities despite the housing allocations.

- **Impact on surrounding parishes / coalescence:** Representors felt that the impact of proposed development upon the surrounding parishes and potential for coalescence had not been taken into account. This was outlined as being contrary to criterion 5 of the Royal Wootton Bassett policy given it doesn't protect the distinct character of the town. The proposed development do not respect the existing clear boundaries to the town.

### Neighbourhood Plan

- **Ignores / overrides Neighbourhood Plan:** The proposals for Royal Wootton Bassett ignore the findings and content within the neighbourhood plan.

### Junction 16 / strategic road network

- **Evidence of impacts:** It is understood the junction is near capacity and the draft plan doesn't appear to sufficiently consider the ability for Junction 16 to accommodate the proposed levels of growth and any further cumulative effects from growth levels around employment and other uses within close proximity to this strategically placed junction. It does not appear sufficient work has been undertaken in collaboration with National Highways. Representors also indicated that the data used to inform assessments that had been undertaken is out of date.
- **Lack of assessment:** National Highways has not had sight of any operational assessment work for M4 Junction 16. No assessment work has been shared with us and no infrastructure improvements at M4 Junction 16 are detailed within the updated Infrastructure Delivery Plan. We would recommend that Wiltshire Council undertake the necessary operational assessment to ensure that any infrastructure needs are identified in line with NPPF and the DfT Circular 01/2022.

### Omission sites and site selection process

A number of omission sites were promoted, including:

- Land North of Whitehill Lane (Royal Wootton Bassett), Land East of A3102 (Royal Wootton Bassett), Spittleborough Farm, Lower Woodshaw Farm, Land at Junction 16, Land at Marlborough Road (Site 6), Land East of A3102 (Site 5), Land North of Whitehill Lane (Site 4), Land north of Swindon Road (Site 9).

These were, in part, accompanied by critique of the processes that had led to the sites not being allocated.

### Site selection process

- **Most sustainable sites rejected:** Critique was provided on the subjectivity of the process (place shaping priority assessment) of the sites selected for development at Royal Wootton Bassett and the lack of transparency on why the selected sites were chosen. The selection of preferred sites appeared not to be in accordance with the findings of the sustainability appraisal with the selection of preferred development sites appearing flawed, unsound and unjustified. Some representors suggested they also go against the aspirations of the place shaping priorities and does not represent a sustainable strategy for the town.

## Main issues: Royal Wootton Bassett market town

### Policy 48: Land at Marsh Farm

- **Unsuitable for development:** Representors outlined the site as unsuitable for development and / or constrained based on factors including landscape impacts on surrounding settlements (and as per planning permission refusal), drainage issues on site including impact on thunder brook and springs feeding jubilee lake (and as per planning permission refusal), poor and unsafe access onto A3102 which is already congested, poor accessibility and sustainable linkages to services / facilities / employment opportunities, concerns about waste water capacity.
- **Water supply upgrades required:** The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure.
- **Heritage impact assessment:** The SA recommends a separate additional HIA to inform this proposal. It is not clear whether this has taken place. Historic England note there is a potential impact on the significance of the Grade II Listed Marsh House.
- **Biodiversity:** Given the close proximity of the allocation to the Jubilee Lake LNR Natural England recommends that the policy includes a requirement to provide additional support for ongoing visitor management on the LNR.
- **Housing capacity:** The housing capacity suggested in the policy is not reflective of what is possible on site. The housing capacity should be increased to approximately 175 - 200 dwellings.

### Policy 49: Land at Midge Hill Farm

- **Unsuitable for development:** Representors outlined the site as unsuitable and / or constrained for development based on factors including landscape impacts on surrounding settlements, drainage issues on site including impact on thunder brook and springs feeding jubilee lake, poor and unsafe access onto A3102 which is already congested.
- **Water supply upgrades required:** The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure.
- **New primary school location and need:** If there is a requirement for additional primary provision to serve the new Local Plan population (there is no available evidence to justify this, which must be provided), then a rounded analysis must be undertaken to confirm whether a new school is required (as opposed to expansion of existing school(s)) and, if so, the most appropriate geographical location and point within the Plan period for this to come forward.
- **Employment land / need / flexibility:** The requirement of employment land at the scale suggested was questioned at this site with there being a need for the provision of such land to be proportionate to the site and location. Perhaps a more balanced provision of employment land across allocated sites would be more appropriate. In the event that demand for this land is not realised, sufficient flexibility should be provided in the planning policies to allow consideration of an alternative configuration/ balance of uses.
- **Heritage impact assessment:** The SA considers there is an opportunity for realistic and adequate mitigation to minimise harm. It would be reassuring to appreciate the view of the local authority conservation officer, and their involvement in the assessment process. Otherwise perhaps a more explicit HIA may be necessary at this stage mindful of the need for proportionate and appropriate HIA to inform plan proposals (as per Historic England representation).
- **Biodiversity:** Given the close proximity of the allocation to the Jubilee Lake LNR Natural England recommends that the policy includes a requirement to provide additional support for ongoing visitor management on the LNR.

## Main issues: Royal Wootton Bassett market town

- **Non residential uses:** Only 6% of the net developable area of Woodshaw is proposed in the draft allocation to be used for non-residential purposes, comprising a nursery and local centre. This is compared to over 30% of the net developable area of Midge Farm Hall. At present the approach taken cannot be considered robust or justified, as the requisite evidence is not available to demonstrate how the split in uses across the allocations has been determined.
- **Housing capacity:** It is noted that there are inconsistencies between the number of dwellings required by the draft policy compared with the accompanying Concept Plan. The key included Concept Plan states that land at Midge Hall will deliver approximately 329 homes at a density of 37 dwellings per hectare (dph). The policy however outlines a more appropriate delivery of 415 dwellings.

### Policy 50: Land West of Maple Drive

- **Unsuitable for development:** Representors outlined the site as unsuitable and / or constrained for development based on factors including the requirement for water supply infrastructure, transport impact upon local estate roads and subsequently A3102, impact of springs present on site.
- **Biodiversity / Jubilee Lake CWS:** Given the close proximity of the allocation to the Jubilee Lake LNR Natural England recommends that the policy includes a requirement to provide additional support for ongoing visitor management and the provision of enhanced recreational infrastructure. Natural England recommends that the policy is strengthened by the provision of a minimum area requirement for the green infrastructure in the northern section of the allocation.
- **Housing capacity:** Suggested that through previous neighbourhood plan exercise the site was deemed capable of delivering 110 units. The site was suggested as being capable of delivering a higher number of units than the 70 proposed within the allocation.

### Policy 51: Land at Woodshaw

- **Unsuitable for development:** Representors outlined the site as unsuitable and / or constrained for development based on factors including the distance the site sits from the town centre / services / facilities and the impact this will have on the transport network (A3102 and B4042), accessibility poor via sustainable means / pedestrian travel to key destinations in and around the town, safety of access onto A3102, flooding on site that has occurred recently and the impact of the proposed development, landscape impacts on surrounding settlements and green buffer to Swindon / character of the town.
- **A3102 roundabout:** Comments and supporting evidence were submitted to suggest there is no need to make changes to the existing roundabout on the A3102. Alternative plans were proposed.
- **Water supply upgrades required:** The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure.
- **Biodiversity:** The 13.8 hectares of green infrastructure within the concept plan as a means of reducing recreational pressure on the Morningside Farm County Wildlife Site needs to be set out in the policy as a minimum area requirement for the scheme. Morningside Farm County Wildlife Site is managed by the Wiltshire Wildlife Trust as a nature reserve. Given the proximity of the development to the reserve Natural England recommends the policy recognises that increased recreational activity are likely to result from the allocation and that any resulting increase in reserve management costs, including increased requirements for warden visits, are appropriately compensated.
- **Justification for a local centre, convenience store, and 0.4ha of land for nursery provision:** Comment questioned the justification for this requirement citing that the site is located less than half a mile, or a ten-minute walk, from the facilities on Roebuck Close. There is a risk that the provision of new facilities

## Main issues: Royal Wootton Bassett market town

could undermine the existing provision, both at Roebuck Close and on the High Street. Furthermore it was questioned whether the requirement for a convenience store would meet the Council's 'sequential test' approach to citing new retail provision or whether a new convenience store would be viable.

## Council response

### Housing and employment

Further information, including Council responses, in Table 3.17 provides strategic context on the decisions made, process and evidence informing the level and distribution of growth. The Planning for Royal Wootton Bassett<sup>99</sup> document then provides place specific information including the context and challenges for Royal Wootton Bassett alongside information relating to the key factors that have informed the distribution of growth, summarising information from a variety of evidence sources that informed this decision.

The Local Plan envisages Royal Wootton Bassett, as a focus for growth, having a stronger role to diminish its strong reliance toward Swindon by greater provision for local jobs and additional services and facilities. These will help promote greater self-containment. Higher rates of housing growth are proposed than the previous plan but, at a rate not substantially higher than actual levels delivered.

For Royal Wootton Bassett a key consideration has been the assessment of the sites north and south of the railway line. As outlined within the site selection process, the sites to the south give rise to concerns regarding the potential for integration and connectivity to the town centre with the requirement for a bridge and access road giving rise to feasibility concerns for the southern sites. Land availability investigations have indicated that land is not available for the delivery of a bridge. For these reasons, the sites to the north of the railway line perform better overall.

### Infrastructure, constraints and site selection

The Planning for Royal Wootton Bassett document provides a host of information outlining how proposals for Royal Wootton Bassett have been established and informed by a variety of evidence sources. This includes outlining the challenges, constraints and local infrastructure considerations for Royal Wootton Bassett.

Appendix 2 of the Planning for Royal Wootton Bassett document also summarises the site selection process for Royal Wootton Bassett, outlining the findings from each stage. This includes detail on the pool of sites considered, the reasons for site removal via exclusionary criteria at stage 1 of site selection whilst also outlining the findings of stage 2 which further sifted sites based on a range of criteria. Following explanation as to whether any sites were then combined for further assessment, the document summarises the findings from sustainability appraisal and provides a table of sustainability appraisal key issues for sites assessed. Finally the findings of stage 4 are summarised. Stage 4 qualitatively examined the sites giving consideration to their capability of supporting the Local Plan's objectives for each community, in particular the identified 'Place Shaping Priorities' whilst also analysing the scale of growth that would be required to be drawn from the pool of the most sustainable site options to meet the identified housing and employment needs for the settlement.

<sup>99</sup> [Planning for Royal Wootton Bassett](#), Wiltshire Council (September 2023)



### **Junction 16 / strategic road network**

Following on from an agreed scope with National Highways for Junction 16 operational assessment, further scenarios are to be modelled. Further information on this is contained within Table 3.16 alongside the Statement of Common Ground (SOCG) being prepared with National Highways.

### **Policy 48: Land at Marsh Farm**

A Statement of Common Ground (SOCG) is underway with the Leda Properties Limited that will provide contextual information and focus on key issues relevant to the site. This will aim to provide commentary on any areas of disagreement as well as establish common ground on matters in principle. This will also contain housing trajectory information. To inform the examination process and assist the Inspector, SOCGs will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector. Key topic areas this SOCG will aim to cover includes the number of dwellings the site can accommodate alongside foul water and water supply issues. Other areas to be covered include infrastructure and mitigation measures including walking and cycle links / connection improvements and mitigation required in respect to the Grade II Listed building.

### **Policy 49: Land at Midge Hill Farm**

A Statement of Common Ground (SOCG) is underway with L & Q Estates that will provide contextual information and focus on key issues relevant to the site. This will aim to provide commentary on any areas of disagreement as well as establish common ground on matters in principle. This will also contain housing trajectory information. To inform the examination process and assist the Inspector, SOCGs will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector. Key topic areas this SOCG will aim to cover includes the quantum of employment on site, the need for and provision of a Local Centre on site and the need for flexibility for the school and employment land use for residential purpose. Other areas to be covered include the walking and cycle links / connection improvements alongside the quantum of development, the accuracy of the concept plan and education contributions.

### **Policy 50: Land West of Maple Drive**

A Statement of Common Ground (SOCG) is underway with TOF Corporate Trustee Limited that will provide contextual information and focus on key issues relevant to the site. This will aim to provide commentary on any areas of disagreement as well as establish common ground on matters in principle. This will also contain housing trajectory information. To inform the examination process and assist the Inspector, SOCGs will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector. Key topic areas this SOCG will aim to cover includes the number of dwellings the site can accommodate alongside the ecology and landscaping constraint and mitigation requirements. Other areas to be covered include the walking and cycle links / connection improvements alongside public transport, education and healthcare contributions.

### **Policy 51: Land at Woodshaw**

### Main issues: Royal Wootton Bassett market town

A Statement of Common Ground (SOCG) is underway with David Wilson Homes that will provide contextual information and focus on key issues relevant to the site. This will aim to provide commentary on any areas of disagreement as well as establish common ground on matters in principle. This will also contain housing trajectory information. To inform the examination process and assist the Inspector, SOCGs will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector. Key topic areas this SOCG will aim to cover includes whether the site meets a threshold whereby the delivery of a new convenience store is justified, the capacity enhancement of the A3102 roundabout alongside the delivery of significant investment in foul capacity in the area. Other areas to be covered include vehicular access to the western and southern site boundary alongside enhancements to the local bus service.

### 3.2.7 Main issues: Local Plan section 4 (Trowbridge HMA)

**3.35** Presented below are the main issues raised by the representations with regards Local Plan section 4 focusing upon the strategy for the Trowbridge HMA, namely:

- Strategy for the Trowbridge HMA
- Trowbridge Principal Settlement
- Bradford on Avon Market Town
- Warminster Market Town
- Westbury Market Town

**3.36** Within the table for each place are the main issues raised for all policies associated with that place. For instance, the Trowbridge Principal Settlement table will contain main issues for policy's 52 (Trowbridge Principal Settlement), 53 (Land North-East of Hilperton), 54 (North Trowbridge Country Park), 55 (Land at Innox Mills) and 56 (Trowbridge Central Area).

**3.37** Where representations have presented issues as per those reported against sections 1-3 of the draft Plan, these have not been repeated against these place specific policies. However, in some instances further place specific detail may be provided. Please refer to the main issues presented against sections 1-3 of the draft Plan to understand these overarching plan wide matters.

**3.38** Given the overlap between the comments for the strategy for all the rural areas, these main issues have been presented in one table covering topics relevant to the strategy for all rural areas after the presentation of main issues for each HMA.

### Main issues: Strategy for the Trowbridge HMA

**Table 3.38 Local plan Strategy for the Trowbridge HMA main issues**

Main issues: Strategy for the Trowbridge HMA	
<b>Level / distribution of growth</b>	
	<ul style="list-style-type: none"><li>• <b>Increase housing distribution to Trowbridge / Trowbridge HMA:</b> Linked to the low level of growth planned for within the draft Plan / lack of housing allocations within Wiltshire to provide a deliverable supply of homes to meet Wiltshire's housing need, comments indicated a need to distribute and allocate a larger amount of housing growth to Trowbridge / Trowbridge HMA. This was also linked to the constrained nature of the Salisbury HMA indicating a justification to redistribute growth elsewhere in the county.</li></ul>

## Main issues: Strategy for the Trowbridge HMA

- **Increase housing figure / distribution to Trowbridge rural area:** The distribution of growth does not reflect the percentage of people who currently live in Trowbridge rural area (e.g., population split of the Trowbridge HMA is currently approx. 28% of the population living in the 'rest of HMA'/Rural Area, whereas the intended housing strategy would result in only 10% of the housing requirement being allocated to such villages). The distribution of the Trowbridge HMA Housing Growth should be amended to introduce a higher proportion of housing in the Rural Area category, there appears to be no justification for not pursuing this approach. This would allow for the positive planning for future housing, particularly addressing those in affordable housing need whilst distributing growth to relatively unconstrained areas. Some representors did support the continued focus on the principal settlement / market towns.
- **Spatial strategy relies too heavily on complex urban extensions:** The spatial strategy should be reviewed as it is too weighted towards large scale complex sites adjacent to principal settlements and should have a more decentralised strategy to meet the growth requirement with more development distributed to market towns and rural areas, alongside smaller site allocations. Specifically to the Trowbridge HMA, some comments highlighted the example set by the Ashton Park Wiltshire Core Strategy allocation that firstly outlines the risk in relying on such sites but also questioned that this site should still be retained and relied upon for housing delivery.
- **Distribution of growth not appropriately reflecting past levels of growth:** Where the draft Plan outlines that a location has seen higher than expected rates of housebuilding in preceding years [e.g., Westbury] it goes on to use this to help justify a period of steadier housing growth. This does not reflect that such growth has actually reflected the sustainability of the location and suitability of the land and settlement to accommodate additional growth. The draft Plan should support an approach of additional planned growth, acknowledging the sustainability of the location (e.g., Westbury). Similarly provision at Trowbridge was outlined as not appropriately reflecting past delivery at Trowbridge and the impact this has had, with this cited as having unintended consequences for future growth. Past performance is skewing the forward distribution of growth. Prior low delivery is not a justification for continued growth at this low level.
- **Green belt review:** The review of the green belt is most appropriate mechanism for securing new sustainable residential development within the Trowbridge HMA. It is not justified to constrain development without considering this option and, in order to deliver the housing (including affordable) the area needs, a green belt review is required. Given house prices, housing / affordable housing need, exceptional circumstances exist and without this review, the plan and approach is ineffective and unsound.

### Omission sites and site selection process

A number of omission sites were promoted, including:

- Land at Edington Road (Steeple Ashton), Land to the north of Shallow Wagon Lane (Westbury), Land North of Clivey (Dilton Marsh), Land off Storridge Road (Westbury), Land off Blind Lane (Southwick).

These were, in part, accompanied by critique of the processes that had led to the sites not being allocated.

## Council response

### Level and distribution of growth

## Main issues: Strategy for the Trowbridge HMA

Further information, including Council responses, in Table 3.17 provides strategic context on the decisions made, process and evidence informing the level and distribution of growth. The Planning for Trowbridge<sup>100</sup>, Planning for Bradford on Avon<sup>101</sup>, Planning for Warminster<sup>102</sup> and Planning for Westbury<sup>103</sup> documents provide place specific information including the context and challenges for each place alongside summaries relating to the key factors that have informed the distribution of growth for each settlement, summarising information from a variety of evidence sources informing these decisions.

For this housing market area Trowbridge as a Principal Settlement is the primary focus for future growth. The revised spatial strategy however supports a reduced emphasis than in previous Plans, in part reflecting lower need and environmental factors. There are relatively large areas of land already available for both employment and housing development, which have been slow to come forward and will continue to meet needs over the Plan period. Bradford on Avon is a constrained settlement, with its outward expansion severely limited by green belt designation. Warminster, meanwhile, similar to Trowbridge has relatively large areas of land available for employment and housing. An urban extension to the west of Warminster now largely directs the scale of housing and employment growth in the town. Westbury has seen higher than expected rates of housebuilding in preceding years compared to the planned level of growth. This has combined with slower than expected economic development and this Local Plan proposes a period of steadier housing growth, with rates lower than those achieved in recent years.

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<sup>100</sup> [Planning for Trowbridge](#), Wiltshire Council (September 2023)

<sup>101</sup> [Planning for Bradford on Avon](#), Wiltshire Council (September 2023)

<sup>102</sup> [Planning for Warminster](#), Wiltshire Council (September 2023)

<sup>103</sup> [Planning for Westbury](#), Wiltshire Council (September 2023)

## Main issues: Trowbridge Principal Settlement

Table 3.39 Local plan Trowbridge Principal Settlement main issues and Council response

### Main issues: Trowbridge Principal Settlement

#### Trowbridge housing / employment

- **Increase housing distribution to Trowbridge:** Linked to the lack of housing allocations within Wiltshire to provide a deliverable supply of homes to meet Wiltshire's housing need, comments indicated a need to distribute and allocate a larger amount of housing growth to Trowbridge. The quantum of growth allocated to the Town of Trowbridge is not justified by the Sustainability Appraisal. Strategies incorporate significantly higher growth at Trowbridge than the revised strategy in the Regulation 19 Plan. There is no justification for a reduced emphasis on Trowbridge and it is not reflective of its principal settlement status.
- **Coalescence / location of growth within surrounding settlements and neighbourhood plans:** The strategy for Trowbridge needs to clearly set out, and reflect, the need to respect and conserve the separate identity of the surrounding settlements. The development strategy has not done this given one of the allocations is within Hilperton. Such a strategy doesn't and hasn't taken account of the neighbourhood plans that these settlements have prepared / there is a need to respect and reflect the content of these neighbourhood plans. The evidence underpinning the strategy and site selection process has not reflected the findings and content of these neighbourhood plans.
- **Insufficient allocations:** There are not sufficient allocations to meet the housing need at Trowbridge and the reliance on broad locations for growth and neighbourhood plans to deliver housing is not effective. For instance, there appears to be no intention to progress a Trowbridge Neighbourhood Plan to meet the requirement for 300 homes.
- **Broad location for growth lack of justification / detail:** There is no evidence that there is a reasonable prospect of the Trowbridge broad location for growth coming forward within the Plan period. There is no indication of its location, timescales for delivery, consideration of future infrastructure requirements and associated viability, or any firm commitment to a 'subsequent development plan document' in the Local Development Scheme. Therefore, this approach is not in accordance with either the NPPF or NPPG and is not sound. Other representors outlined that the allocations within the draft Plan prejudged the location of the broad location for growth through policy 53 (Land North-East of Hilperton) and policy 54 (North Trowbridge Country Park).
- **Ashton park reliance:** Ashton Park was allocated as the key strategic site in the Core Strategy. It is not justified to simply roll forward the strategic site to meet future housing needs in Trowbridge with little re-assessment. Inadequate justification is provided in the Draft Plan to justify how Ashton Park will now deliver in the plan period.
- **Green belt review:** The most sustainable location for growth at Trowbridge involves proper consideration of the Green Belt to the west of the town. The decision to exclude land within the Green Belt at Stage 1 of the site selection process, contrary to the recommendation of the Sustainability Appraisal, fundamentally undermines the robustness of the site selection process and an assessment investigating the presence, or otherwise, of exceptional circumstances to justify land release from the green belt should be undertaken.
- **Employment overprovision:** Noted that the strategy for Trowbridge proposes a significant oversupply of employment land, where the indicative demand is between 4.8ha and 6.9ha. However, Policy 52 makes provision for 27.4ha of employment land over the plan period. It may be more appropriate to consider alternative uses on this employment land.

## Main issues: Trowbridge Principal Settlement

### Infrastructure / constraints

- **Highway network:** Growth at Trowbridge may exacerbate existing congestion on the highway network, with evidence appearing unclear with regards the impact upon the transport network. National Highways outlined the need to understand the cumulative impact of growth upon the A36. Staverton bridge was also outlined as a specific constraint to future growth at the town.
- **Healthcare infrastructure:** The planned growth for Trowbridge should be accompanied by planned expansion of healthcare provision and mechanisms (e.g., funding and allocations) to provide this. Such provision is outlined within the IDP but not reflected within the Trowbridge policies.

### Omission sites and site selection process

A number of omission sites were promoted, including:

- Land at West Ashton Road (aka Land at Biss Farm, SHELAA site 3247), Barn Farm (and two smaller parcels of land to the southwest of the Farm), Maxcroft Farm, Land south of Park Farm (North Bradley), Land west of Lambrok Close, Land at The Uplands (Site 1), Land behind 118 Trowbridge Road (Hilperton, SHELAA sites 646 and 647), Drynham Lane, Church Harm (Phase 2, Hilperton), Land to the West of Trowbridge, Land north of Hill Street / west of Greenhill Gardens.

These were, in part, accompanied by critique of the processes that had led to the sites not being allocated.

### Policy 53: Land North-East of Hilperton

- **Unsuitable for development:** Representors outlined the site as unsuitable / constrained for development based on factors including impact of heritage assets (e.g., Hilperton conservation area, listed buildings, Whaddon Lane), impact upon ecological importance of the site (e.g., for bat species as a corridor), landscape character impacts / coalescence impact upon Hilperton, poor access to services and facilities alongside a lack of such provision on site (e.g., healthcare, secondary education, employment opportunities), pressure on poorly provisioned canal footpath, poor drainage and flood risk on site and impacts upon Avon.
- **Site area / dwellings:** The site area could and should be extended to enable the site to contribute more housing growth to meet the housing needs of the town and ensuring the most efficient use of land. The sustainability appraisal reflects this given the larger site demonstrates sustainability benefits. The number of dwellings should be expressed as a minimum and could be higher with an extended allocation. Given the current uses proposed and the area of the site, 600 units appears challenging.
- **Transport impact / access:** Comments casted concern with regards the impact the development would have upon the highway network (A361) and associated roundabout, through Hilperton alongside the Staverton river crossing to the north of the site. Other comments outlined that Whaddon Lane should not be used as an access due to its unsuitability. Whilst other comments noted the A361 as suitable for access, there was also critique that the access within the site (concept plan) appeared to have been altered post cabinet meeting removing access through to the site boundary for potential future development.

## Main issues: Trowbridge Principal Settlement

- **Heritage:** Historic England questioned whether a Heritage Impact Assessment had taken place and on what basis a view had been established that development at this site can avoid harm to the local heritage interests e.g., the nearby conservation area. Evidence to justify and explain the avoidance of harm would be welcome.
- **Justification for uses other than residential:** Questioned the justification for the education provision on site alongside calls that there needs to be flexibility within the policy should this provision not be necessary. A similar lack of justification was outlined for the convenience store, whilst the site promoter outlined the need to provide for a care home on site.
- **Neighbourhood plan:** The allocation has disregarded the content of the Hilperton Neighbourhood Plan.
- **Ecological impact:** The allocation lies on a known bat commuting corridor with limited alternative commuting routes around the site. Natural England advises that the proposed 50 m ecological corridors on the east and through the development as shown on the concept plan are critical to the allocation and should be identified as minimum requirements within the Policy 53. Some responses outlined that this allocation is closer to / has heightened impacts upon the bat SAC when compared to other alternative locations for growth. Note, site promoter outlined the 50m buffer as unjustified.
- **Suitable Alternative Natural Greenspace suitability / delivery:** The anticipated cost for the new Country Park is not clarified in the Wiltshire Infrastructure Delivery Plan (IDP). The IDP states that SANG is to be “provided by contributions proposed strategic allocations in the north of Trowbridge” . This raises viability challenges for the allocation in isolation and may delay delivery of this site. Some comments criticised the location of the SANG outlining that it was not within the draft allocation and the distance from the site allocation will preclude it from providing the benefits intended.
- **Large village allocation:** The allocation is within Hilperton and is not reflective of the large village status of this location. The allocation is aimed towards meeting the housing needs of Trowbridge not Hilperton and is spatially separated from Trowbridge settlement boundary.

## Policy 54: North Trowbridge Country Park

- **Management:** It isn't clear who will manage this resource and this information is important to understand for it's effective delivery.
- **Links to Land North-East of Hilperton:** It is not clear that this SANG applies to the development identified in Policy 53 (Land North-East of Hilperton) and could not be used to seek to justify speculative development. The policy should clearly state that it is permissive of development on the site, not a justification for development on other related sites.
- **Insufficient mitigation / wrong location:** The provision of a country park would not mitigate the 'likely significant effects' of the development. Loosing green space through development and opening up another is not a suitable mitigation strategy. The SANG was cited as being poorly located, spatially, as an attractive alternative to the protected woodland due to its disconnect with the urban area and poor sustainable / safe pedestrian travel links. Other options exist to provide better situated SANG provision for Trowbridge.
- **SANG disproportionately large:** A population multiplier of 2.4 people per dwelling generates a requirement for 10 hectares of SANG in association with a development of 600 dwellings. It follows that there is a substantial discrepancy between the amount of land that Policy 54 seeks to lock down as SANG,



## Main issues: Trowbridge Principal Settlement

and the level of SANG that is needed to mitigate the scale of development identified in Policy 53. The Policy 54 area would provide sufficient SANG for 3,385 dwellings, whereas the Plan only commits to 600 dwellings.

- **Timing of delivery:** Some representors outlined the need for this asset to be released in advance of any occupation at Land North-East of Hilperton whilst others outlined this to be unrealistic and unnecessarily onerous. It was outlined as being unclear when this land will be made available for a country park by the owners, and that it was unnecessary to expect developers of the housing allocation to be held to ransom by a third party on when units can be released / the reliance on this risked delaying the delivery of housing.

### Policy 55: Land at Innox Mills

- **River corridor [ecological value]:** The requirement for enhancing the River Biss corridor should include enhancing the river as an ecological corridor and include a requirement to avoid additional light spill from the developed areas onto the river corridor as per Natural England representation.
- **River corridor [flood risk]:** Residential development has been indicated on the concept in that part of the site within flood zones 2 and 3, flood risk is not reflected within the policy. The Sequential Test should have been undertaken for the site as per Environment Agency representation. River restoration should be referred to within the policy as opposed to just enhancement.
- **Viability and housing delivery:** Representation indicated that the policy / allocation is likely to face significant and complex remediation costs that may hinder delivery whilst also outlining that the affordable housing provision is low. It was highlighted that it is understood the capacity of the site to accommodate housing development is higher than that reflected within the policy. Comments also indicated that viability work undertaken has indicated that a number of the policy requirements are not viably deliverable.

### Policy 56: Trowbridge Central Area

- **Riverway Industrial Estate:** It should be noted there are several permitted waste processing facilities on the Riverway Industrial Estate. This policy should therefore also include in its mitigation requirements assessments of potential noise and odour impacts from the adjacent waste processing facilities to inform an appropriate layout and necessary mitigation measures as per Environment Agency representation.

## Council response

### Housing and employment

Further information, including Council responses, in Table 3.17 provides strategic context on the decisions made, process and evidence informing the level and distribution of growth. This is supplemented by information in Table 3.18 that contains information, and Council response, regarding broad locations for growth.

## Main issues: Trowbridge Principal Settlement

The Planning for Trowbridge<sup>104</sup> document then provides place specific information including the context and challenges for Trowbridge alongside information relating to the key factors that have informed the distribution of growth, summarising information from a variety of evidence sources that informed this decision. For Trowbridge this has included striking a balance between meeting the growth needs of a town that plays an important strategic role as an employment, administrative and service centre for the west Wiltshire area with the environmental constraints, namely green belt to the west with colonies of bats to the east and south relating to the Bath and Bradford on Avon Bats Special Area of Conservation. Notwithstanding housing development in recent years, Trowbridge has not grown as anticipated for both housing and employment, and there remains significant allocations that will continue to help meet housing needs over this Plan period, supplemented by allocations within this Local Plan.

### Infrastructure, constraints and site selection

The Planning for Trowbridge document provides a host of information outlining how proposals for Trowbridge have been established and informed by a variety of evidence sources. This includes outlining the challenges, constraints and local infrastructure considerations for Trowbridge.

Appendix 2 of the Planning for Trowbridge document also summarises the site selection process for Trowbridge, outlining the findings from each stage. This includes detail on the pool of sites considered, the reasons for site removal via exclusionary criteria at stage 1 of site selection whilst also outlining the findings of stage 2 which further sifted sites based on a range of criteria. Following explanation as to whether any sites were then combined for further assessment, the document summarises the findings from Sustainability Appraisal and provides a table of sustainability appraisal key issues for sites assessed. Finally the findings of stage 4 are summarised. Stage 4 qualitatively examined the sites giving consideration to their capability of supporting the Local Plan's objectives for each community, in particular the identified 'Place Shaping Priorities' whilst also analysing the scale of growth that would be required to be drawn from the pool of the most sustainable site options to meet the identified housing and employment needs for the settlement.

### Policy 53: Land North-East of Hilperton

A Statement of Common Ground (SOCG) is underway with the relevant developers and landowners that will provide contextual information and focus on key issues relevant to the site. This will aim to provide commentary on any areas of disagreement as well as establish common ground on matters in principle and housing trajectory information. To inform the examination process and assist the Inspector, SOCGs will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector. Key topic areas this SOCG will include site access to the site, ecological mitigation with regards to bats and education provision.

### Policy 54: North Trowbridge Country Park

<sup>104</sup> [Planning for Trowbridge](#), Wiltshire Council (September 2023)

## Main issues: Trowbridge Principal Settlement

Future development will need make provisional for SANG in order to bring forward development and discussions with the landowners are taking place and information will be reflected within a SOCG. This SOCG will cover the proposed area of the SANG and the delivery of this to support growth at the town. It is intended that there will be a masterplan developed for the Country Park working in conjunction with Natural England to secure the provisional and maintenance of the site.

### **Policy 55: Land at Inox Mills**

There is a current approved planning application for this site, subject to S106. A Statement of Common Ground (SOCG) is underway with the relevant landowner that will provide contextual information and focus on key issues relevant to the site. This will aim to provide commentary on any areas of disagreement as well as establish common ground on matters in principle and contain housing trajectory information.

To inform the examination process and assist the Inspector, SOCGs will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector.

Key topic areas for this SOCG will cover how development of the site will have regard to bat and heritage assets which will inform site layout. The SOCG will also cover matters including the quantum of development for the site, the associated viability implications of the provision of affordable housing and financial contributions towards early years, primary and secondary education places alongside highway matters and the provision of lift access to railway.

## Main issues: Bradford on Avon Market Town

Table 3.40 Local plan Bradford on Avon Market Town main issues and Council response

Main issues: Bradford on Avon Market Town
<p><b>Bradford on Avon housing / employment</b></p> <ul style="list-style-type: none"> <li>• <b>Inadequate housing delivery / allocations / not meeting housing need:</b> The Plan fails to appraise the potential options to meet the unmet housing need in BoA and allocates an inadequate level of housing in the town which will result in a worsening situation for the town's population. The housing requirement at BoA should be increased to reflect affordability adjustments to the overall housing need figure. Restricting growth to the level outlined within the plan due to constraints is unjustified and does not reflect the higher past levels for growth that demonstrate the suitability and sustainability of the settlement as a location for growth. The plan needs to plan positively to meet housing need and this approach fails to do this whilst also ignores the SA that indicates Bradford on Avon to be the least affordable location within the HMA whilst also having the most limited supply of affordable homes.</li> <li>• <b>Uncertain affordable housing provision:</b> The reliance on windfall to deliver 80 dwellings provides no certainty of delivery plus the threshold for site size (less than 10 dwellings) falls below the threshold for affordable housing provision. Allocations are required at the town to provide certainty to deliver affordable housing. The delivery of affordable housing over recent years has been significantly below the 40% target with concerning waiting times, the draft Plan does not meet the needs of the town.</li> <li>• <b>Green belt review:</b> The settlement is enclosed by the green belt and therefore the review of this is the most appropriate mechanism for securing new sustainable residential development. It is not justified to constrain development at the settlement without considering this option and, in order to deliver the housing (including affordable) the town needs, a green belt review is required. Given house prices and affordable housing need, exceptional circumstances exist and without this review, the plan and approach is ineffective and unsound.</li> <li>• <b>Small site allowance:</b> It will be difficult to deliver these homes over the plan period via this means given the inaccessible / constrained nature of the remaining sites within the town. Objections were lodged with regards the assertion that BoA's residual housing requirement of 80 homes can be met through small &amp; medium sized sites throughout the town but the Plan fails to allocate any sites.</li> </ul>
<p><b>Neighbourhood Plan</b></p> <ul style="list-style-type: none"> <li>• <b>Allocate sites within Neighbourhood Plan:</b> If this means that the review of the Neighbourhood Plan will be able to identify sites for future development then this is welcomed. The BoA Neighbourhood Plan will be able to identify and support suitable sites for future development – a call for sites has already been issued, which may be able to offer more than the 15 homes calculated in the neighbourhood area requirement.</li> <li>• <b>Insufficient level of housing growth identified within the Neighbourhood Plan:</b> The Neighbourhood Plan designation of 15 dwellings is insufficient and will not aid in affordable home provision or provide flexibility or headroom to proactively plan for growth. Similarly, without the Local Plan looking to allocate housing / release land from the greenbelt, it will be very difficult for the Neighbourhood Plan to allocate land for development.</li> </ul>
<p><b>Omission sites and site selection process</b></p>

## Main issues: Bradford on Avon Market Town

A number of omission sites were promoted, including:

- The football ground site, Cemetery Lane, Land north of Leigh Park Road, Land to the east of Bradford on Avon, Bath Road, Land off Trowbridge Road.

These were, in part, accompanied by critique of the processes that had led to the sites not being allocated.

### Infrastructure / constraints

- **Transport infrastructure and air quality:** Congestion, poor pedestrian provision and poor air quality were cited as representing significant constraints to future growth at the town that must be taken into consideration when planning any future growth at the town. Policy within the draft Plan does not specify what actions could and should be taken to help assist in tackling these constraints.

### Site selection process

- **Green Belt review:** Comments indicated that the site selection process was not effective or justified as it did not factor in a review of the green belt / consideration of sites within the green belt beyond stage 1 meaning no sites in the green belt were considered within the SA. This despite the SA recommending Green Belt review.

### Reserve site

- **Petition:** One petition that received 1067 hand written signatures and 1063 electronic signatures was received (comment number 2146). This petition seeks the removal of the Bradford on Avon former golf course as a reserve site for development. This was on the basis that the site would see the loss of a valued and important green space in the town. It would also have detrimental impacts for landscape and wildlife.
- **Unsuitable for development:** Representors outlined the site as unsuitable / constrained for development based on factors including the inability to deliver affordable homes / site viability, achievability and suitability of vehicular access, unassessed and unacceptable impact on transport network / air quality, unjustified loss of a sports facility with no agreement to this from Sport England / England Golf, loss of an important green and blue infrastructure corridor alongside River Avon of ecological importance (including to bats), flood risk present on the site
- **Ecological importance of site:** The River Avon corridor, that the site sits in, is especially important for rare bats protected as part of the Bath and Bradford on Avon Bats SAC, as well as forming an important green corridor or for other environmental and landscape interests and so the scale of development envisaged, may not be possible as per Natural England's representation.
- **Prior land use of site (landfill):** The site is an historic landfill site and has contamination and stability issues. Development would require removal of large amounts of waste such as asbestos and heavy metals, posing a risk of river pollution and to site viability. Environment Agency outline how mitigation requirements should be required within the policy regarding land contamination assessments and if required, remediation prior to development taking place. Representors indicated that such prior land use had not been considered as part of the SA.

## Main issues: Bradford on Avon Market Town

- **Flood risk and sequential test:** The site includes areas contained within Flood Zones 2 & 3. The site should only be included if it has passed the sequential test as per Environment Agency representation.
- **Site should be an allocation:** The reserve site should be included as an allocation to provide certainty with regards housing delivery that the current strategy for Bradford on Avon doesn't provide.

## Council response

### Housing and employment

Further information, including Council responses, in Table 3.17 provides strategic context on the decisions made, process and evidence informing the level and distribution of growth. The Planning for Bradford on Avon<sup>105</sup> document then provides place specific information including the context and challenges for Bradford on Avon alongside information relating to the key factors that have informed the distribution of growth, summarising information from a variety of evidence sources that informed this decision.

Bradford on Avon is a constrained settlement and has limited opportunities to expand. The main constraint to outward urban expansion is the West Wiltshire Green Belt and, as such, there are no housing allocations proposed for this settlement. The Plan expectation is that a good proportion of the settlement's housing needs over the plan period will be met through small sites, with a focus on redevelopment opportunities within the settlement boundary. Additional sites may also be identified through the neighbourhood planning process, as led by the town council. In terms of employment, there is only a small need identified for Bradford on Avon, as such no sites have been allocated within the settlement itself, as there are a surplus number of sites that may accommodate need within Trowbridge and Westbury.

### Infrastructure, constraints and site selection

The Planning for Bradford on Avon document provides a host of information outlining how proposals for Bradford on Avon have been established and informed by a variety of evidence sources. This includes outlining the challenges, constraints and local infrastructure considerations for Bradford on Avon.

Appendix 2 of the Planning for Bradford on Avon document also summarises the site selection process for Bradford on Avon, outlining the findings from each stage. This includes detail on the pool of sites considered, the reasons for site removal via exclusionary criteria at stage 1 of site selection whilst also outlining the findings of stage 2 which further sifted sites based on a range of criteria. Following explanation as to whether any sites were then combined for further assessment, the document summarises the findings from sustainability appraisal and provides a table of sustainability appraisal key issues for sites assessed. Finally the findings of stage 4 are summarised. Stage 4 qualitatively examined the sites giving consideration to their capability of supporting the Local Plan's objectives for each community, in particular the identified 'Place Shaping Priorities' whilst also analysing the scale of growth that would be required to be drawn from the pool of the most sustainable site options to meet the identified housing and employment needs for the settlement.

<sup>105</sup> [Planning for Bradford on Avon](#), Wiltshire Council (September 2023)

## Main issues: Bradford on Avon Market Town

### Reserve site

Further information, including Council response, in Table 3.18 provides context with regards the criteria for when a reserve site will be supported for appropriate proposals. Reserve sites, like site allocations, are a result of the site selection process with further information being available within the Planning for Bradford on Avon document, namely Appendix 2 that deals with site selection. The Council consider that a Statement of Common Ground (SOCG) is not necessary at this point in time.

## Main issues: Warminster Market Town

Table 3.41 Local plan Warminster Market Town main issues and Council response

Main issues: Warminster Market Town
<p><b>Warminster housing / employment</b></p> <ul style="list-style-type: none"><li>• <b>Housing requirement should be increased:</b> This was argued to be both via Wiltshire's housing requirement being too low and also the proposed level of growth not reflecting the role Warminster plays as a market town. Growth should be higher to support the role and function of the town.</li><li>• <b>Focus on West Warminster Urban Extension:</b> The strategy for Warminster relies too heavily on the delivery of the WWUE, which has been slow to progress, delivering slower than as anticipated by the WCS; there is insufficient justification given to support an expected increase in the rate of delivery of the WWUE. Additional allocations are required to reduce this reliance and provide certainty of delivery.</li></ul>
<p><b>Omission sites and site selection process</b></p> <p>A number of omission sites were promoted, including:</p> <ul style="list-style-type: none"><li>• 44 &amp; 48 Bath Road (site 7), land at Ashley Coombe (site 3), Fanshaw Way (site 10), Land at Damask Way, Land north of Boreham Road (part of site 2), Land east of the Dene (SHELAA 603), Land part of WWUE (SHELAA 743), Land off Westbury Road (Site 9)</li></ul> <p>These were, in part, accompanied by critique of the processes that had led to the sites not being allocated.</p>
<p><b>Constraints / infrastructure</b></p> <ul style="list-style-type: none"><li>• <b>Highway network:</b> Growth at Warminster may exacerbate existing congestion on the highway network, with evidence appearing unclear with regards the impact upon the transport network. National Highways outlined the need to understand the cumulative impact of growth upon the A36.</li><li>• <b>Healthcare infrastructure:</b> The planned growth for Warminster, which despite limited new allocations is significant, was met by calls for a more consistent approach to healthcare infrastructure / funding across the draft Plan strategies and within the policy. Other representors pointed towards a lack of healthcare capacity.</li><li>• <b>Phosphate neutrality / River Avon SAC:</b> Due to the location of the Warminster WWTWs in relation to the town the provision of phosphorus neutrality measures at Warminster will be challenging. The policy clause in this regard should be clarified to ensure policy support for measures that may come forward that will help to achieve the necessary levels of phosphorus mitigation required for new residential development as per Natural England representation.</li><li>• <b>Phosphate neutrality surmountable / site selection:</b> Other representors pointed towards bespoke onsite mitigation being possible for nutrients pollution, and therefore this should not prohibit sites from being allocated at Warminster. The same argument indicated that the neighbourhood plan requirement should be higher and that the site selection process was flawed due to not progressing sites on this basis.</li></ul>
<p><b>Policy 59: Land off Brook Street</b></p>



## Main issues: Warminster Market Town

- **Delivery mechanisms / mitigation function:** It is unclear how this land can be used for offsetting nutrients when Cannimore Brook which flows through it in a culvert is not subject to sewage outfalls and only rises about a kilometre from Brook Street. How would mitigation work on site? Clarification / examples would be beneficial as per Environment Agency representation.
- **Flood risk:** This land (Brook Street) is in the flood zones and in proximity to an Environment Agency flood storage area. Due to existing flood risk in this area, and properties flooding frequently, there is an opportunity to use this safeguarded land to reduce the flood risk to the community. For example, by re-naturalising the river through this section out of the existing culvert with associated wetland for nutrients. The wording of the policy must ensure that this flood risk ambition is not compromised by the delivery of the nutrient mitigation as per Environment Agency representation.

## Council response

### Warminster growth and policy 58, Warminster market town

Further information, including Council responses, in Table 3.17 provides strategic context on the decisions made, process and evidence informing the level and distribution of growth. The Planning for Warminster<sup>106</sup> document then provides place specific information including the context and challenges for Warminster alongside information relating to the key factors that have informed the distribution of growth, summarising information from a variety of evidence sources that informed this decision. For Warminster the West Warminster Urban Extension continues to be the main source of supply for housing and employment needs at Warminster over the Plan period. It is supplemented with allocations in the Wiltshire Housing Site Allocations Plan that are starting to come forward for development.

The town is situated towards the headwaters of the River Wylde, which forms part of the River Avon system Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI). Nutrient management (phosphates) is an acute issue for this part of the county. The Planning for Warminster document highlights how the sustainability appraisal showed all the sites had a range of negative environmental effects. A strategic issue which impacts all sites at Warminster is that of phosphates pollution entering the River Wylde. Being located close to the headwaters of the River Wylde means there are limited sites which can provide for mitigation of phosphates entering the watercourse, which represents a barrier to further housing development at this time. It may be possible for development proposals to demonstrate bespoke solutions to the issue of phosphates pollution entering the watercourse, but there is insufficient certainty that this will be the case for the allocation of further sites through the Local Plan.

### Infrastructure, constraints and site selection

The Planning for Warminster document provides a host of information outlining how proposals for Warminster have been established and informed by a variety of evidence sources. This includes outlining the challenges, constraints and local infrastructure considerations for Warminster.

<sup>106</sup> [Planning for Warminster](#), Wiltshire Council (September 2023)

## Main issues: Warminster Market Town

Appendix 2 of the Planning for Warminster document also summarises the site selection process for Warminster, outlining the findings from each stage. This includes detail on the pool of sites considered, the reasons for site removal via exclusionary criteria at stage 1 of site selection whilst also outlining the findings of stage 2 which further sifted sites based on a range of criteria. Following explanation as to whether any sites were then combined for further assessment, the document summarises the findings from Sustainability Appraisal and provides a table of sustainability appraisal key issues for sites assessed. At Warminster, the sustainability appraisal identified that there were likely major adverse effects arising from the development of all the sites within the pool of sites.

### **Policy 59: Land off Brook Street**

The Council has identified a change for Policy 59 that it considers the examination process may wish to address. Proposed deletion of Policy 59 Land off Brook Street which is considered to be unavailable for the delivery of a wetland scheme designed to assist with phosphate mitigation. However, alternative measures are being delivered to deal with this issue through other projects.

## Main issues: Westbury Market Town

Table 3.42 Local plan Westbury Market Town main issues and Council response

Main issues: Westbury Market Town
<p><b>Westbury housing / employment</b></p> <ul style="list-style-type: none"><li>• <b>Housing requirement should be increased:</b> This was argued to be both via Wiltshire's housing requirement being too low and also the distribution being too low for Westbury, below the rates as per the Wiltshire Core Strategy. Proposed growth does not reflect Westbury's status as a Market Town, its sustainability as a location for growth nor does it facilitate the enhancement of infrastructure provision.</li><li>• <b>Increase housing number / distribution to rural areas:</b> The current growth strategy may not sufficiently address housing needs in rural areas. Therefore, it's suggested to revise the growth strategy to increase housing distribution to rural areas, with additional capacity at Westbury, balancing development, and meeting housing needs in both urban and rural areas.</li></ul>
<p><b>Omission sites and site selection process</b></p> <p>A number of omission sites were promoted, including:</p> <ul style="list-style-type: none"><li>• Westbury Cement Works, Land at Brook Farm (Brook Lane), Glenmore Farm, Land at Shallow Wagon Lane, Land between Mill Brook and Coach Road, Land at Slag Lane, Land at Meadow Lane, Land West of Hawkeridge, Land North of Newtown, Land South of Sandhole Lane, Land to the South of Westbury.</li></ul> <p>These were, in part, accompanied by critique of the processes that had led to the sites not being allocated.</p>
<p><b>Constraints / infrastructure</b></p> <ul style="list-style-type: none"><li>• <b>Not constrained:</b> Westbury, not significantly environmentally constrained and with a strong employment base and good services / facilities, has significant development potential that the draft Plan has not optimised.</li><li>• <b>Highway network / air quality:</b> Growth needs to be balanced with infrastructure and community services investment. Traffic and air quality issues are prominent at Westbury, particularly on the A350, which requires attention. Funding contributions are needed for the Westbury Transport Strategy and a new bus service. National Highways outlined that growth at Westbury may exacerbate existing congestion on the highway network, with evidence appearing unclear with regards the impact upon the transport network, going on to outline the need to understand the cumulative impact of growth upon the A36.</li><li>• <b>Healthcare infrastructure:</b> New growth should contribute to healthcare funding. There were calls for a more consistent approach to healthcare infrastructure / funding across the draft Plan strategies and within the policy. Other representors pointed towards a lack of healthcare capacity.</li></ul>
<p><b>Policy 61: Land West of Mane Way</b></p> <ul style="list-style-type: none"><li>• <b>Quantum / site area:</b> The overall quantum of development should be increased to approximately 340 dwellings. The quantum of development proposed is based on a high-level assessment which our representations conclude fails to consider in sufficient detail the constraints and opportunities at this site. The</li></ul>

## Main issues: Westbury Market Town

extent of the allocation area should also be updated to accurately reflect Persimmon's land holdings. The extent of land proposed to be allocated at Policy 61 does not align with Persimmon's land control.

- **Railway bridge land / contributions / viability / delivery:** It is unclear, due to discrepancy between policy and supporting text, whether land is safeguarded or whether there is also a requirement for financial contributions. The viability of these aspects does not appear to have been assessed. The delivery of the road bridge is a strategic matter for the local authority / highway authority subject to viability and feasibility assessments. The provision of land and contributions compromises the viability of development. Other representors outlined insufficient detail was provided about the access across the railway line to the north of Mane Way.
- **Water Meadows:** The requirement for an assessment of water meadow across the site is unjustified and unexplained. Natural England supported this requirement.
- **Heritage assets / impact assessment:** Historic England outlined that there appears to be a potential opportunity to positively respond to affected assets and secure a sustainable future for the moated site which needs to be explored, going on to outline that it is unclear if an HIA has been undertaken. They outlined this as a crucial step in understanding the potential impacts on the heritage assets.
- **Flood risk:** Flood risk is not adequately covered within the policy and the site should only be included within the draft Plan if it has passed the sequential test as per Environment Agency representation. Following the Sequential Test, the area of the site suitable for residential uses can only be determined by an appropriate site-specific flood risk assessment. This assessment is crucial for ensuring the safety and sustainability of any potential residential development.
- **Suitable Alternative Natural Greenspace unjustified:** Without specific evidence to demonstrate impact arising from development this site on Pickett and Clanger Woods the requirement of the provision of SANG appears unjustified and should be deleted from the policy. It is not adequately explained whether the proposed allocation at West of Mane Way falls within the Zone of Influence (ZOI) for Clanger Pickett and Clanger Woods. The basis for SANG provision should be clarified within the Local Plan and contributions/ provisions for SANG based on an evidence base that identifies any increased recreational demand pressures arising from development at this site.

### Policy 62: Land at Bratton Road

- **Unsuitable for development:** Representors outlined the site as unsuitable for development based on factors including ....
- **Joint Memorandum of Understanding / access:** Suggest a joint Memorandum of Understanding between the landowners to enable unfettered access to be provided between the landownerships. The Local Planning Authority will need to satisfy itself that the development of any part of the allocation will neither fetter nor impact upon the viability of delivering the remainder. Without policy confirmation of unfettered access there's potential for viability to challenge the delivery of the site and supporting infrastructure.
- **SANG requirement disproportionate (direct link to policy 63):** This policy requires the creation of a new Country Park as SANG before the occupation of a dwelling at the strategic allocations at Westbury. This requirement is seen as disproportionate to the scale of development and the mitigation needed. Using the Trowbridge Bat Mitigation Strategy measure the total need for SANG for the Bratton Road site would be 4.78 ha, much less than the 27 ha Country Park indicated in Policy 63.

## Main issues: Westbury Market Town

- **Funding of SANG:** If the Council wishes to deliver a SANG for the existing population, it is suggested that it can do so using Community Infrastructure Levy (CIL) receipts.
- **Heritage evidence / impact assessment:** It is important all heritage evidence and expertise are considered yet this is unclear, as is the degree to which a heritage impact assessment (which is required) has been undertaken as per Historic England representation. Opposing views were voiced about the impact upon heritage assets with some pointing towards the significance outlined within the SA and others critiquing this assessment.
- **Landscape impact:** Concerns voiced about the landscape impacts of development with Natural England indicating the policy should explicitly reference the proximity of the North Wessex Downs National Landscape and the need for new development to avoid adverse effects to its special qualities.
- **Central green gap not justified:** Disagreement that current evidence justifies the creation of a substantial green gap in the centre of the site between the northern and southern development parcel. The landscape assessment work identifies no justification for excluding a significant portion of the site simply because it provides a viewpoint to the Ridgeway.
- **Renewable energy / district heating / battery storage undeliverable / impact on SANG:** The concept plan includes an area for future renewable energy / district heating / battery storage etc. within the land controlled by the White Horse Country Club. This is considered undeliverable as there is no agreement from the landowner for these uses. Natural England outlined that these uses (SANG and proposed renewable energy as per concept plan) would be incompatible, and the land would not be accessible, so it is advised that either this is relocated outside of the proposed SANG, or the SANG is extended.

## Policy 63: Westbury Country Park

- **Lack of landowner agreement:** White Horse Country Club, falls within the area proposed as SANG, adjacent to the draft allocation at Bratton Way. The concept plan for Land at Bratton Road includes additional land to the east of the land allocated in the proposals map. The landowner of White Horse Country Club objects to Policies 62 and 63 in their current form as it includes their land for a proposed SANG, without their agreement.
- **Alternative development option:** Representor outlined that a significant area of the SANG is under the control of the White Horse Country Club and suggested there may be an opportunity to deliver part of the land holding as SANG alongside residential development / mixed use within the same land holding, which would make the policy deliverable and contribute further to meeting Wiltshire's housing need. An alternative proposal would be to provide significant open space on revised concept plan suitable to mitigate ecological impacts whilst also reducing the disproportionately sized SANG.
- **Management plan / funding:** Comment indicated the Suitable Alternative Natural Greenspace should have a management plan and funding focused on biodiversity, not just amenity purposes. All potential SANG should prioritize biodiversity in their management plans and funding. The policy doesn't clarify this. Other comments indicated that CIL receipts should be considered for the provision of SANG if necessary.

## Infrastructure Delivery Plan

- **Railway Bridge / Land West of Mane Way:** The provision of a road rail bridge is not listed within the 'transport' infrastructure projects for Westbury. The Infrastructure Delivery Plan (IDP) should be updated to include this essential infrastructure at Westbury and ensure appropriate contributions from development sites at Westbury are secured.

### Council response

#### Housing and employment

Further information, including Council responses, in Table 3.17 provides strategic context on the decisions made, process and evidence informing the level and distribution of growth. The Planning for Westbury <sup>107</sup> document then provides place specific information including the context and challenges for Westbury alongside information relating to the key factors that have informed the distribution of growth, summarising information from a variety of evidence sources that informed this decision. For Westbury this has included striking a balance between growth needs and balancing this with transport infrastructure requirements and mitigating environmental impacts upon designations such as the Bath and Bradford on Avon Bats SAC.

#### Infrastructure, constraints and site selection

The Planning for Westbury document provides a host of information outlining how proposals for Westbury have been established and informed by a variety of evidence sources. This includes outlining the challenges, constraints and local infrastructure considerations for Westbury.

Appendix 2 of the Planning for Westbury document also summarises the site selection process for Westbury, outlining the findings from each stage. This includes detail on the pool of sites considered, the reasons for site removal via exclusionary criteria at stage 1 of site selection whilst also outlining the findings of stage 2 which further sifted sites based on a range of criteria. Following explanation as to whether any sites were then combined for further assessment, the document summarises the findings from Sustainability Appraisal and provides a table of sustainability appraisal key issues for sites assessed. Finally the findings of stage 4 are summarised. Stage 4 qualitatively examined the sites giving consideration to their capability of supporting the Local Plan's objectives for each community, in particular the identified 'Place Shaping Priorities' whilst also analysing the scale of growth that would be required to be drawn from the pool of the most sustainable site options to meet the identified housing and employment needs for the settlement.

#### Policy 61: Land West of Mane Way

A Statement of Common Ground (SOCG) is underway with the relevant developer(s) / landowner(s) that will provide contextual information and focus on key issues relevant to the site. This will aim to provide commentary on any areas of disagreement as well as establish common ground on matters in principle. This will also contain housing trajectory information. To inform the examination process and assist the Inspector, SOCGs will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector. Key topic areas this SOCG will aim to cover include the potential / manner through which the site may deliver environmental mitigation / enhancements and infrastructure delivery. This includes matters such as historic environment mitigation for the Moated Site Scheduled Monument and mitigating flood risk on site. Discussions on the railway bridge include balancing financial contributions and land safeguarding to ensure viability.

#### Policy 62: Land at Bratton Road

<sup>107</sup> [Planning for Westbury](#), Wiltshire Council (September 2023)

## Main issues: Westbury Market Town

A Statement of Common Ground (SOCG) is underway with the relevant developer(s) / landowner(s) that will provide contextual information and focus on key issues relevant to the site. This will aim to provide commentary on any areas of disagreement as well as establish common ground on matters in principle. This will also contain housing trajectory information. To inform the examination process and assist the Inspector, SOCGs will, where it is considered appropriate to do so, present suggested changes that parties determine could be made by the Inspector. Key topic areas this SOCG will aim to cover include the delivery of the Suitable Alternative Natural Greenspace alongside consideration of the infrastructure and mitigation requirements set out in Policy 46. Coordination between the two developers for the site will also be important to deliver the required infrastructure and mitigation.

### **Policy 63: Westbury Country Park**

Policy 63 aims to create a 27-hectare Country Park in Westbury, serving as a Suitable Alternative Natural Greenspace (SANG) to support sustainable development and enhance community recreation. A Statement of Common Ground with the landowner of this site is also being prepared. This will discuss concerns about the lack of landowner agreement, alternative development options and a management plan. The policy is important for community and environmental sustainability and the chosen location maximises environmental and recreational benefits. It will also be important to ensure its long-term sustainability.

### 3.2.8 Main issues: Local plan section 4 rural areas

**3.39** Presented below are the main issues raised by the representations with regards Local Plan section 4 focusing upon the strategy for the rural areas for all HMAs, namely:

- Chippenham rural area
- Salisbury rural area
- Swindon rural area
- Trowbridge rural area

**3.40** Given the overlap between the comments for the strategy for all the rural areas, these main issues have been presented in one table covering topics relevant to the strategy for all rural areas. In some instances matters contained within these main issues have been extracted from representations against other parts of the draft Plan to provide an orderly presentation of main issues on matters that are applicable to the rural areas. Whilst main issues have been identified specifically to each HMA within this table, those main issues not identified against a specific HMA have arisen from analysis of representations against all HMA's and are applicable to all areas.

**3.41** Where representations have presented issues as per those reported against sections 1-3 of the draft Plan, these have not been repeated against these place specific policies. However, in some instances further place specific detail may be provided. Please refer to the main issues presented against sections 1-3 of the draft Plan to understand these overarching plan wide matters.

### Main issues: Section 4 Rural Areas

**Table 3.43 Local plan Section 4 Rural Areas main issues and Council response**

Main issues: Section 4 Rural Areas
<p><b>Rural housing requirements</b></p> <ul style="list-style-type: none"><li>• <b>Growth should be higher:</b> The overall Wiltshire housing requirement should be higher, leading to subsequent higher rural housing numbers.</li><li>• <b>Numbers should be a minimum:</b> Rural housing requirements should be set as a minimum.</li><li>• <b>Windfall not taken into consideration:</b> Concern that no windfall allowance has been applied to the rural requirements; it is unknown where windfalls will take place which could lead to pressure to develop in villages to meet notional targets even if there are high levels of windfall development elsewhere.</li><li>• <b>Methodology incorrect:</b> The methodology does not recognise that some rural settlements are more sustainable than others due to proximity to higher order settlements/access to a wider range of services and facilities or strategically important location; such settlements should be subject to higher requirements. The</li></ul>



## Main issues: Section 4 Rural Areas

methodology places overreliance on existing completions and commitments, removing opportunities for further sustainable growth through the plan period. Arbitrary redistribution of 'surplus' requirement is flawed as this artificially curtails growth irrespective of capacity to sustainability accommodate development. The methodology should also take into account whether or not there are suitable, available and deliverable sites.

- **Types of housing:** Concern that the methodology does not consider the needs for other types of housing such as extra care homes required for the elderly. There is a lack of rural strategy for this type of provision.

### Settlement hierarchy

- **Incorrect status of settlement:** Settlements were critiqued as being incorrectly identified based on their current size, services and facilities. For instance combination of some locations (e.g., Derry Hill & Studley), the identification of certain locations as large villages (e.g., Pitton), the need to 'upgrade' settlements to large villages (e.g., Minety), the need to 'upgrade' settlements to local service centres (e.g., Lyneham), the need to 'upgrade' settlements to market towns (e.g., Cricklade). The settlement hierarchy fails to acknowledge how the sustainability of settlements may have changed.

### Distribution of growth

- **Distribute growth to rural areas:** Concern that directing most of the HMA's requirements to main settlements is unjustified given the rural nature of the county / when many rural settlements are sustainable and unconstrained locations for growth. Growth in these areas would diversify supply of housing providing contingency to delays on large complex schemes.

### Employment

- **Principal employment area amendments:** Representors outlined the need to review and alter rural principal employment areas. This was from a perspective of expansion, reduction and removal. E.G., Cotswold business park identification, High Post expansion, Broomcroft Road (Pewsey) removal.

### Neighbourhood planning / allocate sites

- **Reliance on neighbourhood plans / need to allocate sites:** Neighbourhood plans should not be relied on to deliver housing requirements (including affordable); the Local Plan should allocate additional sites in the rural settlements. Where neighbourhood plans are not taking place / may not take place, this leads to an uncertainty in delivery of required growth. Existing allocations should also be reviewed and where delivery appears unlikely, such allocations should be reviewed and not relied upon to deliver housing growth.
- **Allocate existing Neighbourhood plan allocations:** Where housing allocations exist in current neighbourhood plans the local plan should include these as allocations to protect these allocations.

### Constraints / infrastructure

- **Unsustainable transport:** Developing in these rural areas / housing numbers (methodology) has not taken into consideration the poor sustainable transport connectivity in many of these locations and the impact upon transport networks.

## Main issues: Section 4 Rural Areas

- **Infrastructure / services / facilities insufficient (linked to housing methodology):** Developing in these rural areas / housing numbers (methodology) has not taken into consideration the poor infrastructure / services / facilities as such locations and the impact upon these. For instance utility provision, healthcare provision / capacity, employment opportunities, education capacity,
- **Deliver homes to enhance infrastructure and affordability:** Comments pointed out the need to develop in rural locations to enhance the infrastructure and sustainability of rural settlements whilst also helping to provide affordable housing.
- **Education:** Objections were received that housing numbers were reduced at some locations / guided by education constraints which can fluctuate over time.
- **NHS shortfall:** Objections were received that evidence was not sufficient to suggest that housing numbers should be reduced at some locations / guided by perceived healthcare constraints.

### Chippenham HMA

- **Omission sites promoted:** Land to the south of Clay Lane (Market Lavington), Land to the east of Atworth Business Park (Atworth), Land at Station Road (Christian Malford), Land at Old Road (Derry Hill), Land north east of Hullavington, Land north of Hullavington, Oaksey Park, Land at Butts Farm (Potterne), Land North of Folly Lane & South of First Lane (Shaw / Whitley), Land at Whitley Farm (Shaw / Whitley), Land at Sopworth Lane (Sherston), Land at Sherston Lane (Sherston), Land at Sutton Lane (Sutton Benger), Land off Ballingers (Urchfront), Land Lying to the south west of High Street (West Lavington), Land at Biddlestone Lane (Yatton Keynell), Land to the south of Corsham Road (Lacock), Land to the east of Notton (Lacock), Land south of Seagry Road (Lower Stanton St Quintin), Azimnghur Barracks and Colerne Airfield (for broad locations for growth), Land off High Street (Sutton Benger), Land at Green Farm (Lyneham), RAF Rudloe Manor (Rudloe), Land to the East of Station Road (Purton).
- **Place specific considerations:** The housing numbers / strategy at many locations was critiqued. Representations both promoted the need to allocate sites / direct growth to locations within the Chippenham HMA (often through omission site promotion to meet housing need) whilst others outlined the constrained nature of such settlements and the need for housing numbers to be reduced / allocations not take place.

### Salisbury HMA

- **Omission sites promoted:** Land at Salisbury Road (Downton), Land north of Hamilton Park (Downton), Land on the West Side of Shaftesbury Road (Mere), Land Lying to the East of Woodlands Rd (Mere), Land off Mayhew Row (Tisbury), Naish Felts (Crow Lane, Wilton - site subject to Reserved Matters planning application), Land off Southampton Road (Alderberry), Station Yard (Collingbourne Ducis), Former Millennium Park (Durrington), Land east of Idmiston Road (Porton), Land to the west of Tanners Lane (Shrewton), Land to the south of London Road (Shrewton), Land to the north of Amesbury Road (Shrewton), Land at Ford (Ford), Land at Middleton Road (Winterslow/Middle Winterslow).
- **Place specific considerations:** The housing numbers / strategy at many locations was critiqued. Representations both promoted the need to allocate sites / direct growth to locations within the Salisbury HMA (often through omission site promotion to meet housing need) whilst others outlined the constrained nature of such settlements and the need for housing numbers to be reduced / allocations not take place.

### Swindon HMA

## Main issues: Section 4 Rural Areas

- **Omission sites promoted:** Land north of Malmesbury Road (Cricklade), Land at Godby's Farm (Cricklade), Land at Horsey Down (Cricklade), Land at The Forty (Cricklade), Land at Swan Road (Pewsey), Land at Old Hospital Road (Pewsey), Land at Astley Close (Pewsey), Land west of Southward Lane (Aldbourne), Land at Preston Lane/Victoria Drive (Lyneham), Land off Farthing Lane (Lyneham), Land at Chippenham Road (Lyneham), Land at Pound Farm (Lyneham), Land parcel to the rear of the sewage treatment works (Lyneham), Land at Windham Farm (Purton), Land at South Pavenhill Farm (Purton), Land at Pavenhill (Purton), Land to the north of Newtown Road/south of Whittonditch Road (Ramsbury), Upcott Field (Ramsbury), Land south of Devizes Road (Upavon), Land at Stone Lane (Lydiard Millicent), Land at Nine Elms (west of Swindon, open countryside).
- **Place specific considerations:** The housing numbers / strategy at many locations was critiqued. Representations both promoted the need to allocate sites / direct growth to locations within the Swindon HMA (often through omission site promotion to meet housing need) whilst others outlined the constrained nature of such settlements and the need for housing numbers to be reduced / allocations not take place.
- **Growth west of Swindon:** Representors outlined the need to have an area of search / distribution of housing growth (with allocations) west of Swindon in order to meet the housing needs of the area.

## Trowbridge HMA

- **Omission sites promoted:** Land north of Clivey (Dilton Marsh), Land south of Clivey (Dilton Marsh), Land north of the High Street (Dilton Marsh), Land to the north of Hill Street / west of Greenhill Gardens (Hilperton), Land at Turnpike Close (Semington), Land at St George's Road (Semington), Land at the High Street (Semington), Land at High Street (Semington), Land north of Pound Lane (Semington), Land adjacent 100 Frome Road (Southwick), Land off Edington Road (Steeple Ashton), Land off Blind Lane (Southwick), Land at Wynsome Street (Southwick).
- **Place specific considerations:** The housing numbers / strategy at many locations was critiqued. Representations both promoted the need to allocate sites / direct growth to locations within the Trowbridge HMA (often through omission site promotion to meet housing need) whilst others outlined the constrained nature of such settlements and the need for housing numbers to be reduced / allocations not take place.

## Council response

The Council response prepared in Table 3.17 on matters relating to rural housing and neighbourhood plans and the methodology also represents the Council's response to matters raised within this table (Table 3.43).

### 3.2.9 Main issues: Local Plan section 5 (economic policies)

**3.42** Presented below are the main issues raised by the representations with regards Local Plan section 5 focusing upon the economic policies, namely:

- Policy 64: Additional employment land
- Policy 65: Existing employment land
- Policy 66: Military establishments
- Policy 67: Sequential test and retail impact assessment
- Policy 68: Managing town centres
- Policy 69: Tourism and related development
- Policy 70: Sustainable transport
- Policy 71: Transport and new development
- Policy 72: Development impacts on the primary and major road networks
- Policy 73: Transport: demand management
- Policy 74: Movement of goods
- Policy 75: Strategic transport network

**3.43** Within the table are the main issues raised for all policies associated with the economic policies within section 5 of the plan.

**3.44** Where representations have presented issues as per those reported against sections 1-3 of the draft Plan, these have not been repeated against these specific policies. However, in some instances further policy specific detail may be provided. Please refer to the main issues presented against sections 1-3 of the draft Plan to understand these overarching plan wide matters. Similarly, where a development management policy within section 5 has received comments relating to specific sites, these have not been represented here. Please refer to the main issues presented against that specific place / site to understand these place / site specific main issues.

## Main issues: Economic policies

Table 3.44 Local plan delivering the spatial objectives, economic policies main issues

Main issues: Delivering the spatial objectives, economic policies
<p><b>Employment Land Review</b></p> <ul style="list-style-type: none"><li>• <b>Take into account market signals:</b> The Local Plan policies do not effectively take into account relevant market signals and up to date evidence as required by para 31 of the NPPF. The Employment Land Review underestimates the amount and type of new employment development required to meet demand. Revise the Local Plan policies and ELR to accurately reflect market signals, take into account up to date evidence, and address the true demand for new employment development.</li><li>• <b>Lack of consideration for current and future growth drivers and ‘suppressed demand’:</b> The Swindon and Wiltshire FEMA Assessment (2016) and the Wiltshire ELR (2023) do not consider current and future Industrial and Logistics (I&amp;L) growth drivers and do not account for ‘suppressed demand’ due to historic supply constraints.</li><li>• <b>Lack of evidence to support assumption that 20% of demand can be accommodated on existing sites:</b> The Employment Land Review (ELR) provides limited justification for the assumption that 20% of demand can be accommodated on existing employment land.</li></ul>
<p><b>Policy 64: Additional employment land</b></p> <ul style="list-style-type: none"><li>• <b>Unjustified over provision of employment land:</b> This policy facilitates an unjustified over provision of employment land. Employment provision exceeds actual need and policy promotes speculative development. There should be a limit on delivery of employment land to below 120ha.</li><li>• <b>Under provision of employment land:</b> The Local Plan policies do not effectively take into account relevant market signals and up to date evidence as required by para 31 of the NPPF. The Employment Land Review (ELR) underestimates the amount and type of new employment development required to meet demand. Make further employment site allocations to provide certainty over the delivery of required growth. The anticipated supply of employment land is significantly below the identified level of demand, or even that proposed in the Plan.</li><li>• <b>Strategic and logistic development:</b> Comments noted the lack of evidence, consideration, allocations and provision of sites for logistics development and employment land at accessible strategic locations. Not clear why Junction 17 is mentioned within the policy but other significant opportunities / locations (e.g., Junction 16, A303) are not mentioned with regards the potential they offer / requirement to allocate land, the reference should be more general in terms of policy support for such development and allocate land. Such development should be plan led, supported by allocations.</li><li>• <b>Clarify monitoring process for delivery of employment land:</b> Further clarity is required to confirm that the delivery of employment sites will be subject to regular ongoing monitoring in order to ensure consistency of supply.</li><li>• <b>Include a wider range of employment uses:</b> The policy excludes consideration of non B2, B8 or E(g)(i-iii) uses adjacent to towns outside of the administrative area of Wiltshire. This restricts other employment generating developments falling outside of these use classes.</li><li>• <b>Policy is too restrictive on location:</b> The policy should recognise the potential and facilitate the delivery of employment land outside of settlements, in rural areas to support the rural economy and indeed adjacent to neighbouring authorities (e.g., Swindon). The policy ignores the potential to deliver additional</li></ul>

## Main issues: Delivering the spatial objectives, economic policies

employment space on/near existing existing employment sites, not adjoined to settlements or at locations boasting strong accessibility to strategic transport corridors. Comments also noted ambiguity with the term “adjacent to” which can be up to 5 miles from Principal Settlements, Market Towns, Local Service Centres, and Large and Small Villages, which may impact employers or employment land. Provide a clear definition of “adjacent to” in the context of the plan.

- **Impact on the strategic road network:** Expand criterion (e) of Policy 64 to include the strategic road network (SRN) as per National Highways representation.
- **Omission sites:** The following sites were promoted as opportunities for strategic employment development, land at Junction 16 of the M4 (for non B2, B8 or E(g)(i-iii) uses), land at Spittleborough Farm near Junction 16 of the M4 Swindon (for strategic logistics and local employment development), land at Lower Swinley Farm (logistics), land at Stanton Park (logistics), land at Junction 17 (logistics), land adjacent to the A303 at Earl’s Farm Down, land at Chelworth Industrial Estate Cricklade.

### Policy 65: Existing employment land

- **Ensure wording is not restrictive:** The policy makes reference to Principal Employment Areas and the role and function of individual settlements. The policy needs to apply to employment land that is not restricted to these criteria whilst also ensuring it facilitates development in more rural locations / settlements.
- **Principal Employment Areas:** Critique was placed as to the lack of review of Principal Employment Areas, why certain areas were not designated as such (e.g., Langley Park), why others were not assessed with regards their viability / suitability as employment sites and why some others were not reviewed given the current boundaries are inaccurate (e.g., Policy HQ site).
- **Criteria for alternative uses too narrow / restrictive:** The policy should consider other factors such as the site’s attractiveness to the employment market and its suitability for employment development. Critique was also voiced that the vacancy period criteria was too long and the policy should balance the needs for employment land and housing, particularly in areas with identified shortfalls in housing supply. This excessive period contradicts the National Planning Policy Framework’s emphasis on flexibility and effective land use.
- **Clarify the conditions under which the replacement of lost employment land is required:** This would provide more flexibility for the development of sites where there is no longer a requirement for employment land.
- **Policy should not apply to non-employment uses on existing employment sites:** The policy applies to all uses, including those on existing employment sites which are allocated for non-employment uses. This places an unjustified and onerous requirement onto sites already demonstrated through the allocation process to be sustainable for non-employment use. The policy should clarify distinction between ‘land in employment use’, ‘employment areas’ and ‘employment land’.

### Policy 66: Military establishments

- **Considerations for development within a statutory safeguarding zone:** The wording should be updated to make it clear that development proposed, within a statutory safeguarding zone, that would impact on the operation or capability of safeguarded sites or assets, would not be supported.

## Main issues: Delivering the spatial objectives, economic policies

- **Redundant military site re-use should not be focused solely on employment use:** Concern that the focus of the re-use of redundant military establishment is on employment use and that other uses will only be considered where there is evidence that employment uses are not a practical proposition. Such an approach is unjustified, restrictive and no guidance is given.
- **Definitions:** No definition of “isolated” is given within the Policy and further clarification is required within the policy of the term 'redundant military establishment'. Similarly the requirement for being 'well-related to existing settlements in terms of location and scale' is contradictory given military establishments are located outside settlement boundaries and, due to their function and role, would not normally have any connection to the nearest settlements.
- **Omission sites:** The following sites were promoted as opportunities for development, MoD sites at Colerne Airfield and Azimghur.

### Policy 67: Sequential test and retail impact assessment

- **Threshold for undertaking a retail impact assessment too low:** The threshold of 200sqm for a Retail Impact Assessment is not appropriate as a range of permitted development rights allow change of use up to 500sqm to Class E. The current 200sqm threshold does not fully incorporate the requirements of paragraph 90 of the NPPF.

### Policy 68: Managing town centres

- **Local Centres:** The hierarchy should be expanded to include local centres (e.g., Archers Gate Local Centre in Amesbury - there is no justification for not including Archers Gate as a local centre).
- **Residential use in primary shopping areas:** Policy does not offer guidance on the inclusion of residential development in primary shopping areas. The policy wording should be amended to acknowledge the importance of active frontages but also recognise that the inclusion of residential uses is important for footfall.
- **Boundaries:** Critique was received in a variety of specific instances questioning or recommending changes to the town centre boundaries (e.g., Why Amesbury town centre boundary & primary shopping areas have changed). This included critique and suggestions at Amesbury, Calne, Chippenham, Cricklade and Warminster.
- **Updated evidence required:** An updated retail and town centres assessment is required to fully inform the LPR and overall growth requirements. The Retail and Town Centre Study (2020) commenced at the start of 2020 during the onset of the covid pandemic and there has since been significant change to town centre uses. The study only covers up until 2036.

### Policy 69: Tourism and related development

- **Tourism related development outside of a settlement:** Concern is expressed that the policy doesn't recognise that some tourist/ visitor generating development isn't located near, or dependent on, a nearby settlement (e.g., spas, hotels / diversified farms) but that these facilities do have an important role to play to Wiltshire's tourism. Similarly representation highlighted the importance of facilitating the development of the many rural buildings that are either not being used efficiently or are in a state of disrepair, which could contribute towards the provision of accommodation in a rural setting.

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- **Consideration of the specific bespoke locations (e.g., Longleat Estate, Cotswold Water Park):** The policy doesn't reflect the unique nature and location of certain locations such as Longleat, as it applies a settlement hierarchy approach. Such locations may not fall within any of the defined settlement categories. Future proposals may extend beyond existing/replacement buildings, as such the policy fails to recognise the guidance at Para 85 of NPPF. This may have implications for the retainment and increase of visitor numbers, and is therefore contrary to NPPF Para 84. Such bespoke locations should have special considerations.

### Cross cutting transport policy matters

- **No policies relating to the strategic bus network:** There are no policies relating to the strategic bus network or what measures will be put in place to ensure buses are available as a genuine alternative with no targets or metrics for shifting journeys to bus use. Discussions and policy around the provision of bus routes are considered essential to deliver a coordinated approach, this including across boundaries into neighbouring authorities.
- **Climate change obligations:** The transport policies are unsound as they fail to take the steps within the Transport Evidence Base that are necessary to meet climate change obligations set out by Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 (as amended) and is not consistent with policy 4 of the draft local plan (e.g., minimise carbon emissions by developing in locations which reduce the need to travel). Policies need to make reference to the interventions which are suggested in the Transport Evidence Base for Scenarios 3 and 4. In many instances the policies do not appear to prioritise the importance of tackling climate change and minimising carbon emissions. There is also no reference to decarbonising transport/EV infrastructure.

### Policy 70: Sustainable transport

- **Transport strategies absent:** At local level, transport strategies are insufficiently defined and evidenced covering their deliverability and impact of specific measures and upon allocations.
- **Rural area consideration:** Wider transport strategy/transport transition plans for smaller settlements and rural areas required to demonstrate sustainable transport modes and connections with reference to funding these connections. Policy appears to show an acceptance to people in rural areas having poor sustainable transport access which is a flawed approach inconsistent with NPPF to provide transport choice.

### Policy 71: Transport and new development

- **Clarity of wording / flexibility:** It should be clarified that criteria a-j will not be relevant to every development. At paragraph 5.37 "...must be demonstrated that the needs of all transport users (where relevant) have been considered.", the NPPF does not provide latitude to decide whether it is "relevant" to consider the needs of "all transport users", and this is unsound. Similarly reference to electric vehicle infrastructure being required 'in accordance with national or local standards as relevant' creates uncertainty and contradicts reference to the requirement to accord with Buildings Regs in para 5.41.
- **Local Transport Plan:** The policy and supporting text should make reference to the Wiltshire Local Transport Plan and its specific strategies (e.g., related to accessibility, cycling and powered two-wheelers). It was also noted that an update to the Local Transport Plan is needed to reflect changes in national policy, national guidance and the Local Plan.



## Main issues: Delivering the spatial objectives, economic policies

- **Transport strategies / viability:** Transport strategies for the Principal Settlements and Market Towns have yet to be finalised and are therefore not fully costed. There may be viability implications for developers. Implications of this policy have not been factored into the LPR's viability assessment.
- **Use of planning obligations:** The policy is unjustified as it is contrary to the NPPF and CIL Regulations with regard to restrictions on use of planning obligations.
- **Lack of prioritisation for pedestrians and cyclists:** The policy, as a non-prioritised list, is not consistent with national policy (NPPF para 112) which gives priority first to pedestrian and cycles, followed by less sustainable transport options. Sustainable transport options should be promoted over less sustainable ones.

### Policy 72: Development impacts on the primary and major road networks

- **Applicability to the Strategic Road Network:** It is unclear if the policy is also referring to the Strategic Road Network, and this should be clarified with additional wording in respect of the Strategic Road Network to state that any proposals for new accesses will also have to comply with the requirements of DfT Circular 01/2022 and standards set out within the Design Manual for Roads and Bridges as per National Highways representation.
- **Improvements to the Strategic Transport Network / Infrastructure Delivery Plan:** The Local Plan and its evidence base must identify needs for improvements across the Strategic Road Network (including the A303 and the A36) resulting from planned housing and employment growth. This should be identified in the updated Infrastructure Delivery Plan, with a defined funding and delivery strategy as per National Highways representation.
- **Lack of evidence:** The policy is overly prescriptive and not evidenced. It does not consider circumstances where access from the major road network may be the only viable, safest option/could sterilise opportunities for sustainable development.

### Policy 73: Transport: demand management

- **Reliance on external strategies / documents:** Relevant standards must be set out in the development plan document itself rather than referring to external strategies/ plans. It was also noted that such plans are not available (no Local Transport Plans or LCWIP revised documents are made available, making the policy unsound).
- **Parking / private car use:** The intention of the policy is to persuade people to use alternative transport modes and to reduce the availability of parking however need to ensure it does not conflict with the need to encourage people to travel into town centres and support their continued vitality and viability. Other representors indicated that the suggestions that varying percentage of trips will be made without using the car seems completely unrealistic given the reliance on private cars for work, school etc.

### Policy 74: Movement of goods

- **Applicability to all parts of the County:** Point V of the policy should extend to all parts of the county area, not just town centres. Such an approach is unsound. Policy 74 makes no consideration of the fact that minerals can only be worked where they are found, there is no locational choice. Part i and iv appears inconsistent with Policy 72 which seeks to restrict direct access to the national primary route network or major road network outside built up areas.

## Main issues: Delivering the spatial objectives, economic policies

### Policy 75: Strategic transport network

- **The need for SRN improvements:** National Highways look to the Local Plan Review and associated evidence base to identify the need for improvements across the SRN resulting from planned housing and employment growth.
- **Wilton Junction Railway Station:** The September 2023 Infrastructure Delivery Plan refers to a new railway station at Wilton. This is not mentioned in Policy 75 with the Transport Evidence Base giving 'Wilton Railway Station' an uncertainty category of 'hypothetical'. Substantial work has been undertaken for the re-opening of Wilton Junction Railway Station. Policy 75 should include Wilton Junction to further enhance Wiltshire's sustainable transport offer.

### Council response

As introduced within the introduction to main issues, Council responses have been issued in some circumstances where this is considered helpful to provide context and to introduce and cross reference to other documents that have been prepared to help guide the reader to further information on matters raised through the consultation. Responses have not been issued to all matters raised in the interests of proportionality and on the understanding that in many cases, where more specific and detailed main issues have been raised by consultees, the details can be borne out in the examination. Council responses will also not repeat matters reported in responses elsewhere within this document, such as responses to matters raised by prescribed bodies and neighbouring authorities or against the evidence base and process of how the plan has been prepared as reported within Table 3.16.

### Employment Land Review

The Local Plan policies and Employment Land Review<sup>108</sup> (ELR) align with the National Planning Policy Framework (NPPF), incorporating market signals and up-to-date evidence. The ELR uses employment and output forecasts to assess future employment land needs, acknowledging historic growth in the Manufacturing sector and forecasting a decline in employment but an increase in Manufacturing GVA. The Swindon and Wiltshire FEMA<sup>109</sup> and ELR consider current and future Industrial and Logistics (I&L) growth drivers, addressing demand for modern manufacturing premises and 'suppressed demand' due to historic supply constraints.

### Policy 64: Additional employment land

Policy 64 ensures a balanced provision of employment land by supporting development that aligns with the role and function of settlements, preventing over-provision and focusing on actual demand. It supports employment development in various locations, including unallocated sites and rural areas, ensuring sufficient provision and considering strategic interests. The policy also supports national and regional logistics development adjacent to M4 Junction 17, subject to impact assessments and funding agreements, addressing logistic needs without compromising other planned growth. It includes criteria for supporting proposals, ensuring they are appropriate in scale, do not harm residential amenity, and are supported by adequate infrastructure, providing a clear framework for monitoring and delivery.

<sup>108</sup> [Wiltshire Employment Land Review Update, Final Report](#), Hardisty Jones Associates (September 2023)

<sup>109</sup> [Swindon and Wiltshire Functional Economic Market Area Assessment](#), Hardisty Jones Associates (December 2016)

## Main issues: Delivering the spatial objectives, economic policies

Policy 64 supports a range of employment uses within use classes B2, B8, and E(g)(i-iii), and provisions for farming and rural businesses, ensuring diverse employment opportunities. It allows for employment development in various locations, provided they meet specific criteria, ensuring flexibility without being overly restrictive.

### **Policy 65: Existing employment land**

Policy 65 aims to balance economic growth with the protection of employment land in Wiltshire. It provides clear guidelines with necessary flexibility, ensuring decisions are based on comprehensive evidence. The focus on Principal Employment Areas supports key economic hubs without limiting development elsewhere. The criteria for alternative uses are rigorous to safeguard economic health but allow for changes if the site is unsuitable for business needs or offers significant benefits. The policy clarifies that replacement of lost employment land is required unless there is no longer a need, preventing unnecessary loss. Applying the policy to non-employment uses ensures compatibility with existing employment sites, supporting cohesive development and economic stability.

### **Policy 67: Sequential test and retail impact assessment**

A Retail and Town Centres Study<sup>110</sup> has been prepared by Avison Young to provide evidence base information on retail and town centre planning issues associated with the Local Plan. This contains information on matters such as the review of primary shopping areas and town centre boundaries alongside understand the retail, leisure and other main town centre needs for the next 5, 10 and 15 years. This evidence also contains information behind the threshold for undertaking a retail impact assessment (paragraphs 7.17-7.31 of the Retail and Town Centre Study). The policy will not apply to proposals enabled through permitted development rights.

### **Policy 68: Managing town centres**

The Retail and Town Centres Study also provides evidence informing Policy 68. This has informed the hierarchy of centres. It also reviewed the town centre boundaries and primary shopping areas identified in the GVA Retail Review 2015 and found them to be up to date.

<sup>110</sup> [Wiltshire Retail and Town Centres Study 2020 Volume 1: Main Text](#), Avison Young (November 2020); [Volume 2: Appendices](#), Avison Young (November 2020)

### 3.2.10 Main issues: Local Plan section 5 (social policies)

**3.45** Presented below are the main issues raised by the representations with regards Local Plan section 5 focusing upon the social policies, namely:

- Policy 76: Providing affordable homes
- Policy 77: Rural exception sites
- Policy 78: Meeting Wiltshire's housing need
- Policy 79: First Homes exception sites
- Policy 80: Self and custom build housing
- Policy 81: Community facilities
- Policy 82: Housing in the countryside
- Policy 83: Health and wellbeing
- Policy 84: Open space and play facilities

**3.46** Within the table are the main issues raised for all policies associated with the social policies within section 5 of the plan.

**3.47** Where representations have presented issues as per those reported against sections 1-3 of the draft Plan, these have not been repeated against these specific policies. However, in some instances further policy specific detail may be provided. Please refer to the main issues presented against sections 1-3 of the draft Plan to understand these overarching plan wide matters. Similarly, where a development management policy within section 5 has received comments relating to specific sites, these have not been represented here. Please refer to the main issues presented against that specific place / site to understand these place / site specific main issues.

### Main issues: Social policies

**Table 3.45 Local plan delivering the spatial objectives, social policies main issues**

Main issues: Delivering the spatial objectives, social policies
<p><b>Policy 76: Providing affordable homes</b></p> <ul style="list-style-type: none"><li>• <b>40% affordable housing figure and policy flexibility:</b> Firstly, representations highlighted concern / the need to viability test the blanket 40% approach with comments indicating this had not been robustly tested or demonstrated as achievable. Others pointed out that 'at least 40%' did not represent a</li></ul>

## Main issues: Delivering the spatial objectives, social policies

single figure and was not in accordance with national policy and guidance. In terms of flexibility a lack of clarity was highlighted for what constitutes an exceptional circumstance to show why on site delivery is not possible and how a commuted sum would be calculated and secured. There needs to be clarity on whether there is flexibility to enable less than 40% to be provided and to enable commuted sums to be sought with some outlining that inadequate flexibility is built into the policy which is contrary to National Policy (NPPF para. 82d). Policy requires clarification that provision must be the subject of viability testing at the planning application stage. Affordable housing needs are likely to change over the plan period, across the County and in response to economic circumstances and this should be reflected within the policy.

- **Viability and tenure mix:** The proposed tenure mix is not supported by the Viability Assessment evidence. The reference to changing the tenure mix is misleading. Policy 76 does include some flexibility in terms of tenure, but no flexibility in terms of the number of units. Other respondents indicated that shared ownership and first homes tenures were not justified by the Local Housing Needs Assessment and not consistent with national policy (NPPF Annex 2 sets out a wider range of other affordable routes to home ownership). Greater flexibility in tenure types can support the viability of schemes, by diversifying the tenure offer.
- **Brownfield development:** Whilst supporting text mentions brownfield sites the policy lacks any reference and should acknowledge that specific targets are set for some of the Plan's allocations / should reflect the unique circumstances of brownfield sites whereby a varied approach is required rather than the flat rate in respect of urban regeneration schemes.
- **Clustering:** Reference to small clusters is too vague and should be based on a maximum concentration of affordable housing within a scheme. Given the inclusion of a maximum cluster size of 15 affordable homes, the minimum threshold is unnecessary and unjustified. The two cluster approach on smaller sites has the potential to act as a design constraint working against site specific circumstances.
- **Types of housing:** Neither the policy nor the supporting text clarify whether this policy relates only to C3 housing or whether other types of housing would be required to deliver affordable housing.
- **Unjustified designated rural areas:** It is unclear why these areas are able to support this level of provision compared to others and demonstrating that registered providers would be willing to take on as little as 2 units across small sites such as this. Some representors indicated that this policy for affordable housing provision should only be required for major development of 10 or more, or 0.5ha or more.
- **New Forest National Park:** The New Forest National Park should be excluded from the designated rural area.
- **Local Housing Needs Assessment (Rent to buy housing has not been considered / outdated census):** The Local Housing Needs Assessment has not considered the need for a range of affordable housing home ownership products including rent to buy homes due to it being based upon the outdated Census 2011. The assessment is not consistent with the NPPF. It is based on a single product - a discount market sale option at 50% of a lower quartile new build home, but the NPPF defines a range of products to meet different needs.
- **Local Housing Needs Assessment (Affordable housing need at a sub local authority area level has not been assessed):** Despite the Local Housing Needs Assessment Volume 1 identifying four distinct housing market areas and the Viability Assessment suggesting there to be six value areas, there is no assessment within Local Housing Needs Assessment Volume 2. It cannot be concluded whether a blanket 40% target should be applied, or whether separate targets are needed for each HMA. Policy 78 does not address the spatial differences in viability that were found in the Viability Assessment.

## Main issues: Delivering the spatial objectives, social policies

### Policy 77: Rural exception sites

- **Unsustainable development:** Concerns voiced that the policy risks siting development in inherently unsustainable locations on the edges of villages, some distance from facilities and services which those occupying affordable housing are most likely to be in need of. Concerns were also issued with regards the potential for adverse environmental impacts of such development, for instance landscape impacts / impacts upon National Landscapes with Natural England emphasising the importance of protecting landscape / biodiversity at such development.
- **Exclusion of higher order settlements:** It is unclear as to why rural exception sites would only be supported at Local Service Centres, Large Villages and Small Villages: Provision should also be made for rural exception housing at and around Market Towns who also have identified housing and affordable housing needs.
- **Unjustified thresholds / criteria:** The thresholds proposed are inconsistent with the National Planning Policy Framework, and lacks justification. The National Planning Policy Framework does not specify any limits in size and the justification behind this is unclear. This constrains the ability of rural exception schemes to make an effective contribution towards meeting affordable housing need, constraining sustainable development and potentially discouraging proposals from coming forward. An assessment of proportionality should be made on a case by case basis with regards to the settlement at which the exception site is proposed. It is also unclear how the criteria are intended to be implemented, for instance what happens when some are met but not others (e.g., proposals of more than 20% but less than 5% of the size of the settlement). Other representations indicated that it was not supported / unclear with regards the increase in the limit to 20 dwellings from the current 10.
- **Suppressing delivery of market housing:** Policy unnecessarily restricts the allocation or delivery of market led housing on small to medium sites where the identified housing need is greater than the identified supply. This links to comments on the (unjustified) thresholds within the policy. Provided that the proposal respects the character and setting of the settlement and it is acceptable in the context of other planning considerations, such proposals should be capable of being supported by the Council. Similarly The National Planning Policy Framework does not specify a proportion or state that it must be below a certain level, the 33% proportion appears unjustified. A greater proportion of market housing should be allowed to provide greater flexibility to delivering housing (including affordable) in areas of demonstrable need / where viability demonstrates this as necessary.

### Policy 78: Meeting Wiltshire's housing need

- **Rigid requirement for older person accommodation / requiring the size and type of all housing to reflect the housing need not justified:** The policy fails to allow for developer preference and market flexibility so that viability and delivery are not compromised. There may be a need for different house types on different sites to respond to design and other development management considerations whilst the ability to consider wider local market factors and how delivery on a number of sites might overall contribute to the delivery of the Council's preferred housing mix should be recognised within the policy.
- **M4(2) and M4(3) requirements are unjustified / unviable:** Comments outlined that the M4(3) requirement should be determined on a case by case basis based on local needs and site specific circumstances. The need for M4(3) standard housing is unclear and will be subject to change over the course of the Plan period. There is also a need to differentiate between Part a and Part b of M4(3) standards which can only be required on affordable housing where the Council has nomination rights. The M4(2) requirement is not supported by any evidence and should instead be a figure more aligned with the evidence base. Similarly there is no mention of site specific factors, something which the Housing Technical Optional Standards, National

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Planning Policy Framework Paragraph 8 highlights should be taken into account. The policy does not reflect the flexibility that National Planning Practice Guidance encourages given certain standards may be difficult to achieve in certain circumstances. The Viability Assessment should also consider the cost implications resulting from any requirements for M4(3a) and M4(3b). M4(3b) being considerably more expensive.

- **Local Housing Needs Assessment Volume 2 (M4(2) and M4(3)):** The Local Housing Needs Assessment Volume 2 has inflated the future needs for adapted homes and older persons households requiring specialist housing and M4(2) and M4(3) provision should be reduced accordingly. Representatives outlined suggested flaws in the calculation of the level of M4(2) and M4(3) needs in the Local Housing Needs Assessment.
- **Nationally Described Space Standards unjustified / unviable:** The evidence / justification for Nationally Described Space Standards is not present within the Local Housing Needs Assessment Volume 2 or anywhere else. National Planning Policy Framework emphasises "where a need for internal space standards is identified, local planning authorities should provide justification....." This justification is not evident. The viability evidence also needs adjustment in respect of the floor areas assumed for some dwellings and should ensure that the larger floor area, whilst increasing build costs, do not necessarily translate into higher values per dwellings.
- **Housing size and type requirements unjustified:** The evidence base does not support many of the requirements in Paragraph 2, they are too specific and prescriptive. The Local Housing Needs Assessment Volume 2 does not assess need at sub local authority area. The Viability Assessment does not include any assessment applying a variable housing mix across the six value areas. It is not appropriate or justified to apply outputs of Local Housing Needs Assessment to each and every site which comes forward for development, this fails to account for developer preference and market flexibility.
- **Older people criteria unjustified / unviable:** There should be a housing target for retirement homes and care homes, separate from traditional market housing. Some outlined this requirement as vague, the Local Plan lacking allocations in this regard with it not clear how the policy requirement is to be applied in decision making. Including specialist housing requirements within general needs housing developments is not viability tested in the evidence base. Some suggested such provision should be supported, but it should not be imposed.
- **Older people criteria unjustified / unviable:** The provision of homes for vulnerable people is not viability tested in the evidence base. There needs to be clarity on the term 'vulnerable people', the types of accommodation required and the quantity required, underpinned by evidence.

### Policy 79: First Homes exception sites

- **1ha or 5% requirement does not align with recent national guidance and is unjustified:** This prescriptive test is additional to the proportionality tests included within the May 2021 First Homes National Planning Practice Guidance or the accompanying Written Ministerial Statement or the National Planning Policy Framework September 2023 approach on Entry Level Exception Sites. Seeking to restrict First Homes Exception Sites to collectively not exceed 1ha or 5% of an existing settlement over a Plan Period is not an approach that aligns with the most recent Government policy approach to providing entry level homes for First Homes Buyers. There appears to be no evidence to justify this approach.
- **Designated rural areas:** The exclusion of sites that fall within a designated rural area is inconsistent with national policy (paragraph 72 and footnote 36) and it is not justified by the evidence base. This will limit affordable housing opportunities. The framework specifically distinguishes between

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designated rural areas and other areas in Paragraph 64 in relation to affordable housing thresholds. However, no such distinction is drawn in National Planning Policy Framework Paragraph 72.

- **Cross subsidy criteria unjustified:** This criterion introduces a requirement that where other forms of affordable housing or market home are proposed on a site as a form of cross subsidy to facilitate scheme economics, a local need must be proven. National Planning Policy Framework does not refer to or prohibit the inclusion of market housing for cross subsidy purposes within First Homes Exception Sites, but does refer to other forms of entry level affordable housing being able to be provided where these accord with the affordable housing definition at National Planning Policy Framework Annex 2. No evidence is provided as to why this deviation from Government housing planning policy is necessary or demonstrated what the impact on overall Affordable housing delivery numbers will be.

### Policy 80: Self and custom build housing

- **Site threshold and percentage requirement justification:** There is a lack of evidence underpinning the need, viability and blanket requirement for 5% delivery for sites of 20+ dwellings. No consideration is provided for flexibility, site specific circumstances / locally evidenced need. There is nothing in the legislation or in the National Planning Policy Framework which empowers local plan policies to specify the provision of self and custom build plots through the imposition of a planning obligation on sites or through off site contributions. It is the Councils responsibility, not that of a landowner or developer to ensure that sufficient permissions are given to meet demand. There is a lack of detail within the Local Housing Needs Assessment 2 about the number of plots that should be set aside for self and custom build within the overall local housing need figure or how this relates to site typology and location based on demand preferences. There is no assessment within the Viability Assessment of how the imposition of any self-build or custom build requirement from development would impact on viability. Other representors indicated than on larger sites, this could amount to a significant amount of housing requiring flexibility in the requirement whilst others indicated that often evidence within the register (and subsequently the Local Housing Needs Assessment) can be misleading, overinflating need.
- **12 month marketing period vague:** It is unclear what happens after the 12-month period if marketing has been unsuccessful. Policy should make it clear that such plots will return to housebuilder for market housing following this period.
- **Three year timeframe unreasonable:** The policy requirement to complete self-build plots within three years is unreasonable. Policy should require practical completion within the plan period. In ensuring the plan is responsive to changing economic circumstances and personal circumstances, the 3-year requirement for completion is unreasonable and unenforceable. The mechanism to require completion by an individual is not clear.

### Policy 81: Community facilities

- **Need for a Built Facilities Strategy:** With regard to proposals for new sports buildings, it was advised that a built facilities strategy is commissioned to ensure there are sufficient facilities for both new and existing residents, similar to the playing pitch strategy. This would give a sound evidence base for seeking contributions from developers.
- **Flexibility required regarding locations of community facilities:** The policy is overly prescriptive regarding location and criteria for community facilities.



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- **Flexibility to enable redevelopment of healthcare related property:** The Redevelopment of Community Facilities part of the policy requires flexibility. Requiring (e.g., NHS) disposal sites to explore potential for alternative community uses and/or to retain a substantial proportion of community facility provision will add unjustified delay to vital reinvestment in facilities and services for the community.
- **Duration of marketing exercise:** Marketing period were outlined as being too short and needs to allow local communities sufficient time to respond and generate funds to purchase local assets (e.g. village pubs).

### Policy 82: Housing in the countryside

- **Policy overly restrictive:** The policy does not align with National Planning Policy Framework paragraph 79 and is too restrictive given the predominant rural context of the county, the need for sustainable development within Wiltshire's countryside and does not allowing for site-specific circumstances which justify development coming forward. The policy similarly does not account for opportunities for the redevelopment of previously developed sites in the countryside.
- **Functional and financial evidence:** The requirement for functional and financial evidence of need is overly onerous and not required by national policy, which set a requirement for evidence of an essential need.
- **Approach to non-residential development in the countryside:** The policy only refers to housing development in the countryside - there is a lack of clarity on the approach to farm diversification for uses other than residential, as is required by National Planning Policy Framework paragraph 84.

### Policy 83: Health and wellbeing

- **Unnecessary and unjustified burden / vague requirement:** The policy is unnecessary and provides an unjustified burden on applicants to provide further information for a planning application which would already be covered in other documents (such as Design and Access Statement, Transport Statement, Landscape Statement and Ecology Statement). Concerns regarding the lack of detail as to how this policy is to be implemented as a basis for future decision making causing possible delays and disproportionate burdens on applicants as they prepare Health Impact Assessments in support of development proposals. The justification for the threshold (5ha / 150 dwellings) to prepare a Health Impact Assessment is unclear and the criteria / type / template / process for a Health Impact Assessment also needs clarity. For instance the Wiltshire Design Guide explains that Public Health England in 'Spatial Planning for Health' provides an evidence based resource for planning and healthier places, yet it is not clear within Policy 83 whether this forms the basis upon which HIAs should be prepared.
- **Healthy food environment unjustified / ineffective:** This part of the policy appears to have little to no supporting information underpinning it. It is unclear how a developer would demonstrate compliance / deliver against this policy making this criteria both unjustified and ineffective. The relationship with the Health Impact Assessment is also unexplained.

### Policy 84: Open space and play facilities

- **Major development / adverse impact definition:** The policy references 'major developments' which requires definition as the DMPO definition is different to the definition in the NPPF whilst also going on to refer to 'all development' in the context of protecting and improving public open space. This

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requires clarity but also needs to recognise that not all major development will be able to accommodate on-site open space and will have an adverse impact on public open space provision, notably where the development site does not contain areas of public open space. Similarly the term 'adverse impact' requires clarity.

- **Replacement / definition of open space:** There is no justification to restrict this policy to just the replacement of public space, the policy should provide for the re-provision of playing pitches, including those that are privately owned. Some representors outlined the need to be more specific and provide a definition to what constitutes 'open space'.
- **Open space standards:** To ensure the policy is compliant with paragraphs 16(d) and 34 of the National Planning Policy Framework, it is suggested that the public open space standards are incorporated into the policy. The public open space standards should only be subject of a review through the Local Plan Review, where the implications of the higher standards, including capacity and viability of allocations, can be fully considered.
- **Developer contributions use:** Section 106 contributions can only be sought to ensure a development mitigates its own impact and cannot be used to address existing shortfalls. The policy wording should be amended to include wording that explicitly states an assessment of provision will be undertaken at the time of an application to ensure any requests for Section 106 contributions remain evidenced and justified. The policy is not compatible with the statutory test for planning obligations as stated in regulation 122 of CIL. Natural England highlighted how the policy should be expanded to include a requirement to provide appropriate financial contributions for local existing public open spaces and locally accessible nature reserves that will be used by new residents, compensating for increased visitor manager costs.
- **Planning Obligations SPD:** Policy 84 does not set out the approach for calculating and securing developer contributions for open space and play facilities and defers to the Planning Obligations SPD. It is not clear whether the existing SPD is being referred to or a new SPD, to be prepared following the adoption of the plan. SPD's are not subject to examination, which is believed to be ineffective and inconsistent with national policy. Planning policy must be made through the local plan process to ensure the mandatory requirements for public consultation and independent scrutiny through the examination process.
- **Open Space Assessment:** The wording of the policy does not make it clear new provision should be based on the Wiltshire Open Space Assessment and accompanying guidance. It only states that this guidance applies to open space assessments prepared when there is an adverse impact on provision.
- **Parish / town council agreement:** Clarification is required in terms of how open space management discussions with town/parish councils are assessed for engagement, especially if no agreement is reached.
- **Public open space mapping:** Comments identified / outlined what they believe to be incorrectly mapped public open space in some instances.

## Council response

As introduced within the introduction to main issues, Council responses have been issued in some circumstances where this is considered helpful to provide context and to introduce and cross reference to other documents that have been prepared to help guide the reader to further information on matters raised through the consultation. Responses have not been issued to all matters raised in the interests of proportionality and on the understanding that in

## Main issues: Delivering the spatial objectives, social policies

many cases, where more specific and detailed main issues have been raised by consultees, the details can be borne out in the examination. Council responses will also not repeat matters reported in responses elsewhere within this document, such as responses to matters raised by prescribed bodies and neighbouring authorities or against the evidence base and process of how the plan has been prepared as reported within Table 3.16 .

### **Policy 76: Providing affordable housing**

Policy 76 sets out the council's approach to affordable housing delivery and sets a requirement of at least 40% affordable housing, recognising that it may vary on a site-by-site basis, including because of viability. Section 4 of the Wiltshire Local Housing Needs Assessment <sup>111</sup> (LHNA) contains the evidence for affordable housing needs. The overall need for affordable housing between 2020 and 2038 is a total of 10,451 households. This includes the needs from all households unable to afford to rent or own market housing and also provides for those households who aspire to homeownership but who cannot afford to buy, where there is a realistic prospect of those households being able to access a 50% First Homes property. It is important to recognise that there are many more households who aspire to homeownership who either do not have sufficient income or savings that would enable them to realise their aspiration. The figures also assume that the number of households in receipt of housing benefit to enable them to afford market housing in the private rented sector does not change.

The LHNA Volume 2 report does not establish the policy target for affordable housing. The previous Wiltshire Core Strategy included two zones requiring either 30% or 40% affordable housing. Policy 76 includes one requirement of 40% affordable housing. The viability assessment <sup>112</sup> justifies a single target throughout the County. The viability assessment supporting the local plan did show that on some complex brownfield sites / redevelopment schemes that are considerably more costly may not be capable of supporting complying with the relevant target, but elsewhere, on greenfield sites, development will.

### **Policy 77: Rural exception sites**

Policy 77 allows for the granting of planning permission for small sites comprising affordable housing only as an exception to normal policies. In doing so, the Plan recognises the particular difficulties in securing an adequate supply of affordable housing for local needs in rural areas. It is in accordance with National Planning Policy Framework 2023 Paragraph 82 which says in rural areas planning policies should support housing developments that reflect local need and Local Planning Authorities should support proposals that bring forward rural exception sites that provide some affordable housing to meet identified local needs. Some market housing on these sites can be considered in order to ensure the viability of the site. For this reason, Policy 77 allows for up to 33% market housing to be provided. This is to ensure that the majority of the site remains as affordable housing and can still be considered to be a Rural Exceptions Site.

### **Policy 78: Meeting Wiltshire's housing need**

<sup>111</sup> [Wiltshire Local Housing Needs Assessment Update, Volume 2 Establishing the need for all types of housing](#). Opinion Research Services, (2023)

<sup>112</sup> [Assessment of local plan viability and the review of the Wiltshire Community Infrastructure Levy Charging Schedule](#) (Port Planning Economic, Urban, September 2023)

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It is important that the right homes are delivered in Wiltshire. Wiltshire has an ageing population, more so than the national average, and this needs to be taken into account when planning for new housing. Policy 78 provides the basis for considering dwelling type and mix of housing to be built including specialist homes. The LHNA identifies the accommodation needs of different groups within Wiltshire helping ensure that the needs of Wiltshire's local communities can be addressed.

### **Policy 79: First Homes exception sites**

First Homes are a specific kind of discounted market sale housing, that meets the definition of 'affordable housing' for planning purposes, that is designed to help local first-time buyers on to the property ladder, by offering homes at a discount compared to the market price. To ensure that the First Homes exception policy is effective and does not lead to multiple proposals at a settlement, the level of First Homes at any settlement is restricted.

### **Policy 80: Self and custom build housing**

The Self Build and Custom Housebuilding Act 2015 as amended by the Housing and Planning Act 2016 places a duty on Local Planning Authorities to provide serviced plots which have planning permission that allows for self-build or custom housebuilding. National Planning Policy Framework 2023 Section 5 Paragraph 63 identifies people wishing to commission and build their own homes as one of the groups whose housing needs should be reflected in planning policies. Further advice is provided in Planning Practice Guidance.

Wiltshire Council have put arrangements in place to comply with the Self-Build and Custom Housebuilding Act, including providing a self-build and custom housebuilding registers. They hold an open register with no local connection test and applicants can be on other registers. There is no charge to join or remain on the register.

The LHNA <sup>113</sup> sets out the evidence for self build and custom build homes in Wiltshire. Whilst it is not possible to make a direct comparison of plots against applicants because they are only obliquely related, the continued decrease of plots over time compared to the continued increase in applicants over time suggests that insufficient plots are being granted planning permission for the number of applicants on the register. Therefore the proposed Policy 80 requirement to provide 5% self and custom build plots on sites of 20 or more dwellings will go part of the way to meet the identified needs on the register. Smaller sites for self and custom build can still come forward as windfall opportunities subject to being in accordance with policies in the Local Plan.

Policy 80 requires plots to be marketed for 12 months per plot. If after that time they remain available, they can revert back to the developers for use as market housing. There is an expectation that planning authorities must grant enough permissions to meet the numbers on their register with a 3-year time span. A failure to deliver sufficient plots can be considered as a material consideration in planning appeals. Therefore Policy 80 includes a requirement for plots developed for self and custom build to be completed within 3 years.

<sup>113</sup> Paragraphs 6.69-6.93

### 3.2.11 Main issues: Local Plan section 5 (environment policies)

**3.48** Presented below are the main issues raised by the representations with regards Local Plan section 5 focusing upon the environment policies, namely:

- Policy 85: Sustainable construction and low carbon energy
- Policy 86: Renewable energy installations
- Policy 87: Embodied carbon
- Policy 88: Biodiversity and geodiversity
- Policy 89: Biodiversity Net Gain
- Policy 90: Trees, hedgerows, and woodland
- Policy 91: Conserving and enhancing Wiltshire's landscapes
- Policy 92: Conserving and enhancing dark skies
- Policy 93: Green and blue infrastructure
- Policy 94: Wiltshire's canals and the boating community
- Policy 95: Flood risk
- Policy 96: Water resources
- Policy 97: Contaminated land
- Policy 98: Ensuring high quality design and place shaping
- Policy 99: Ensuring the conservation and enhancement of the historic environment
- Policy 100: The Stonehenge, Avebury and associated sites World Heritage Site
- Policy 101: Air quality

**3.49** Within the table are the main issues raised for all policies associated with the environmental policies within section 5 of the plan.

**3.50** Where representations have presented issues as per those reported against sections 1-3 of the draft Plan, these have not been repeated against these specific policies. However, in some instances further policy specific detail may be provided. Please refer to the main issues presented against sections 1-3 of the draft Plan to understand these overarching plan wide matters. Similarly, where a development management policy within section 5 has received comments relating to specific sites, these have not been represented here. Please refer to the main issues presented against that specific place / site to understand these place / site specific main issues.

## Main issues: Environment policies

**Table 3.46 Local plan delivering the spatial objectives, environment policies main issues and Council response**

Main issues: Delivering the spatial objectives, environment policies
<p><b>Policy 85: Sustainable construction and low carbon energy</b></p> <ul style="list-style-type: none"> <li>• <b>Unjustified energy targets:</b> Comments outlined concern regarding the approach set out in this policy and the use of energy targets which do not appear to be based on any analysis or evidence and are thus unjustified.</li> <li>• <b>All new build / development proposals unreasonable:</b> Comments indicated that the policy requirements should not apply to all new build residential and should recognise the scale of the development in relation to the significant requirements of this policy given the difficulties individual / small sites may face in meeting such measures. Similarly the requirement for all planning applications to be net zero carbon puts an unnecessary burden on minor development proposals.</li> <li>• <b>Building Regulations standards and policy unjustified:</b> There is a disconnect between this policy, which requires all developments to be net zero carbon immediately and to provide on site renewable energy generation to match total energy use, and the Government's forthcoming Building Regulation standards and policy, which require a new home to be zero carbon ready and for requirements for renewable energy to be reasonable. The policy cannot therefore be considered as being consistent with national policy and as a result, is unsound.</li> <li>• <b>Energy consumption unreasonable and ineffective:</b> The unregulated energy consumption is ultimately the function of the residents use of the building, which cannot be influenced by the developer and therefore the requirement on the developer to offset emissions from residents unregulated energy use is not appropriate and unreasonable. Further evidence on how such a policy, i.e. that regulates unregulated energy, would be calculated and then enforced should be clear within the policy.</li> <li>• <b>Energy type too rigid:</b> Reference to a specific type of energy is overly prescriptive and lacks in flexibility. It is unlikely that residential development will be able to generate 100% of the energy required on site even if all roof mounted solar PV opportunities are taken. The policy wording would restrict potential opportunities for the supply of energy from off-site renewable energy sources.</li> </ul>

## Main issues: Delivering the spatial objectives, environment policies

- **Viability challenge and developer contributions:** The requirements in this policy and standards, above those set nationally, will have an impact on development viability possibly rendering development unviable / impacting the overall delivery of a scheme. With regards developer contributions where onsite mitigation cannot be met, there appears no information as to what the developer contributions would be or how it has been calculated.
- **Methodology:** Without specifying the methodology with clear evidence and justification, there is the potential for inconsistency in decision-making, which will affect deliverability. The standards and methodology used must be evidence based and justified. It is not considered that the Council setting its own standards is the appropriate method to achieve carbon reduction outcomes. There is concern that the Council is adding to the complexity of policy, regulations and standards that housebuilders are already expected to comply with.

### Policy 86: Renewable energy installations

- **Policy not positively prepared to facilitate renewable energy developments:** Comments indicated that the policy continues an effective ban on commercial scale onshore wind turbine installations in Wiltshire, and has inadequate policies for ground mounted Solar PV, the other main renewable technology viable in Wiltshire. Not facilitating PV on listed buildings was also criticised. Subsequently the policy is not effective at delivering on the need to tackle climate change. Comments outlined that the policy does not reflect the actual potential to deliver such renewable energy installations within the county. The policy was subsequently pointed out as being inconsistent with Wiltshire Council's own climate strategy and national climate strategies.

### Policy 87: Embodied carbon

- **Monitoring:** There is no indication of how embodied carbon assessment at planning stage would be monitored, checked and verified and how it relates to post construction embodied carbon.
- **Embodied Carbon Assessment vague / unjustified:** Embodied Carbon Assessment needs to be clearly defined and requirements explained. The policy makes vague reference to "*Embodied Carbon Assessment*" without defining any particular form, methodology or basis for undertaking the assessment presented for consultation and understanding. Such an assessment will be costly, have viability implications that appear untested, and the requirement for it appears unjustified and unnecessary.
- **900kg/sqm of carbon unjustified:** The policy and its stated requirement for 900kg/sqm is not supported by evidence and therefore is unjustified. There is similarly no national policy or guidance on this topic. Such a requirement on all development will present challenges, with largely unknown impacts on deliverability and viability at this stage, and given average embodied carbon intensities can vary substantially across different building types. The proposed requirement is based on LETI standards which have not yet been adopted into Building Regulations. Such requirements should not be set out in policy but left to building regulations. Some comments indicated this figure should be lower given best practice demonstrates this as achievable.
- **Not achieving policy aim of carbon reduction:** If, as the supporting text suggests, it is the case that the proposed standard is 'unlikely' to drive a reduction in embodied carbon then it raises questions as to the effectiveness of this policy and justification behind it. There is no suggestion or provisions within this policy that would indicate failure to comply with the standard would result in a scheme being refused.
- **Major development vague and unjustified:** The policy should not de facto and apply to all major development without the consideration of scale of development. The policy wording as currently drafted does not take into account other site-specific circumstances and needs to be clear as to what constitutes 'Major' development to avoid ambiguity or challenge.

## Main issues: Delivering the spatial objectives, environment policies

- **Viability appraisal:** The costs of meeting the energy policy presented within the viability assessment are lower than those identified for similar standards within the Government's Future Homes Hub cost analysis report (2023). The Council has not considered the impact of policy 87 within the viability appraisal supporting the Local Plan.

### Policy 88: Biodiversity and geodiversity

- **Policy wording challenge / clarification:** Comments challenged the policy wording in places, including the applicability of the policy to all habitats without due consideration to their importance / value as per national policy. Clarification was also called for with regards to buffers and the need to clarify what they comprise alongside clarifying the terminology sensitive wildlife species and habitats. Similarly the need for development proposals to demonstrate how they protect features of nature conservation value as part of the design rationale was outlined as not reflecting the mitigation hierarchy as per the National Planning Policy Framework which reflects how compensatory measures can be applied. Greater flexibility was called for in the policy to bring forward appropriate measures based on bespoke development circumstances and the need for mitigation / compensation.
- **Exceptional circumstances:** This wording, in relation to local sites, unnecessarily overstates the thresholds which are set out in national policy. The use of the word 'exceptional' when referring to circumstances where the mitigation hierarchy should apply is not in accordance with national policy. Other comments indicated the wording could and should be strengthened outlining that any damage or disturbance would be unacceptable.
- **Biodiversity in the built environment unjustified:** The requirements of this section were challenged as unjustified and too prescriptive with little flexibility for site specific considerations / design considerations. Comments pointed towards a lack of justification provided as to why the enhanced requirements are proposed above those outlined within the British standard for the provision of integrated nest boxes to dwelling ratio. The requirement for such measures to be in addition to biodiversity net gain was also challenged as unjustified. The requirement for a qualified ecologist to recommend enhancements was outlined as unnecessary given there is best practice to follow.
- **Water, SUDS and nutrient neutrality:** Comments, including those from the Environment Agency, outlined a need to reflect the importance of the Hampshire Avon (and watercourses more generally including chalk streams) and ensure nutrient neutrality is sufficiently included in policy for all development impacting the Hampshire Avon catchment, possibly as a stand alone policy. Policy coverage should also be included to ensure the objectives of the Water Framework Directive are reflected and the incorporation of SUDS is considered.

### Policy 89: Biodiversity Net Gain

- **No justification for 20% Biodiversity Net Gain:** There appear to be no justification / evidence / the justification is unclear for this increased targeted (from 10% to 20%). The policy should be brought in line with national legislation, guidance and policy.
- **Deliverability challenge / need for flexibility:** 20% biodiversity net gain alongside other policy requirements need to be flexible on a site-by-site basis, and negotiable, to ensure site deliverability. The delivery of 20% BNG should not be considered a requirement to make the development acceptable in planning terms (i.e., any provision in excess of the 10% figure should be considered an additional benefit of a proposed scheme).
- **Flexibility in delivering on / off site BNG:** Policy should be flexibility in any allocation requirement and/or policy to enable biodiversity net gain to be achieved on-site, off-site or through combination of both. The DEFRA metric is weighted very much in favour of on-site provision already, but allows flexibility.



## Main issues: Delivering the spatial objectives, environment policies

- **Exempt development:** The requirement for exempted development to achieve no net loss and aspire to at least 20% net gain was resisted by some consultee's as it was not justified. A site cannot be exempt, and also required to deliver biodiversity net gain.
- **Annual monitoring reports onerous:** The reference to “Annual monitoring reports detailing the sites condition must be submitted to the council each year over this period” was outlined as onerous for both the developer and the Council and should be revised / not required given this will be set out in national guidance / legislation. The policy should consider the submission of a monitoring report at decreasing frequency as the 30 year period runs.
- **Viability and site capacity implications:** Potential for viability and site capacity implications for the 20% requirement if this policy is adopted in its current form. It is impossible to know what the cost of delivering net gain is until the base level of biodiversity on a site is known. Any requirement to demonstrate a net gain in excess of 10% should be subject to, and fully accounted for within, the viability assessment [some reps acknowledge the Local Plan viability assessment includes this and outlines the additional cost of £190 per dwelling].
- **Viability Assessment challenge:** Comments indicated that it was unclear how cost per dwelling has been established (greenfield £190 per dwelling, £57 per dwelling on brownfield sites). The cost per house is variable depending on the site circumstances and biodiversity units generally cost £25,000-£35,000 but can be variable with government credits much more expensive again. It is considered that the costs per dwelling put forward within the Viability Assessment have underestimated the costs. Some comments indicated it unclear how can the viability of more than 10% BNG can be established when the market for off-site credits, and therefore the costs of delivering the 10% mandatory BNG system are still emerging.

### Policy 90: Trees, hedgerows, and woodland

- **Need for necessary loss of woodland, hedgerow and trees and greater policy flexibility:** Policy wording needs to be clear and unambiguous to allow for the loss, where necessary, of woodland, hedgerow and trees, as it is in the supporting text to ensure this is not a barrier to site delivery. Currently the requirement that major development proposals make provision for the retention of woodland, hedgerows and trees is inflexible and too onerous given not all trees, woodlands and hedgerows are worthy of retention. This is not reflective of national policy and should instead reflect the mitigation hierarchy.
- **Only major development:** It is not clear why this policy only applies to major development proposals. Smaller-scale development can impact on such features and contribute to the wider objectives which sit behind this policy.
- **Woodland, hedgerow and tree strategy / climate strategy:** Policy requires development to contribute to the tree planting target of Wiltshire Council's 'Climate Strategy and woodland, hedgerow and tree strategy'. No specific documents were published in support of the consultation meaning it is not possible to consider whether such targets are justified or comment on the obligation this place on individual sites.
- **Maintenance, delivery and enforcement unclear:** It is not clear how developers can be held to account to ensure that this policy and noted British Standards BS5837 are complied with.

### Policy 91: Conserving and enhancing Wiltshire's landscapes

- **Policy unjustifiably onerous / exceeds national policy:** Paragraph 174a of the National Planning Policy Framework only requires the conservation of 'valued' landscapes whereas this policy exceeds these requirements by, in its current wording, requiring all landscapes to be conserved and enhanced.

## Main issues: Delivering the spatial objectives, environment policies

This wording threatens the deliverability of the plan and would preclude development from taking place in many instances. Similarly policy does not, but should, embed within it the flexibility / internal balancing provided by paragraph 177 National Planning Policy Framework (2021) with regards the circumstances whereby development can occur in designated landscapes.

- **National Landscapes given insufficient weight:** More significance / weight should be afforded to the importance of National Landscapes given they cover 45% of the county and given the National Planning Policy Framework makes it clear that there are circumstances whereby great weight should be given to conserving and enhancing the landscape and scenic beauty of these protected landscapes. Some specified the need for a separate policy in this regard bespoke to the needs of National Landscapes, their natural beauty and to ensure adherence / consideration is given to National Landscape Management Plans.
- **Consistency with legislative changes:** The policy does not reflect, or have regard to, the new duty to 'seek to further' the statutory National Park / National Landscape purposes placed on 'relevant authorities' by the recently amended Section 11A of the National Parks & Access to the Countryside Act 1949 / the amendment in section 245 of LU&R Act 2023.
- **Need for up to date assessments / strategies:** It is notable that, despite the policy making reference to Landscape Character Areas / Landscape Strategy, revised documents are not available and it is crucial that they are and that the Local Plan is underpinned by 'relevant and up-to-date evidence'.

### Policy 92: Conserving and enhancing dark skies

- **Expand policy to make it more effective:** Comments highlighted areas that should be included / incorporated within the policy, for instance, the policy does not cover building design / materials to reduce light pollution. Other comments highlighted the need to strengthen the policy to account for light sensitive species alongside the need for targets within the policy and the need for the policy to apply across the county / incorporate World Heritage Site outside of National Landscapes.
- **Does not cover Wiltshire Councils duty:** The policy does not cover the Council's responsibility to reduce light pollution, notably within the international dark sky reserve.

### Policy 93: Green and blue infrastructure

- **Policy ambiguity / deliverability challenged:** The policy appears to contain a contradiction between retention, enhancement and unavoidable harm with the penultimate paragraph allowing for loss/damage of GBI where it is unavoidable which appears contrary to other elements of the policy. Comments also highlighted that the retention and enhancement of GBI appears to conflict with greenfield development with definitions / links to other policies / strategies possibly aiding the delivery and understanding of this policy and its implementation. Some highlighted the need for GBI settlement frameworks to assist in this regard.

### Policy 94: Wiltshire's canals and the boating community

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- **Environmental impact assessment unreasonable:** Policy requires that an Environmental Impact Assessment is completed for the whole canal restoration to accompany each planning application. A whole canal project assessment is inconsistent with the treatment of other multi-phase projects which are not required to assess the detailed effects of the whole programme at each application for a part. A more proportionate approach is required.
- **Safeguarded canal routes deliverability / effectiveness / unjustified:** Comments outlined that there is no mechanism in the policy to ensure that safeguarded route development takes place and that the plan does little to positively plan for the restoration and reestablishment of such links / indicated the unjustified removal of the safeguarded route as it stands in current policy (Wiltshire Core Strategy). Others outlined the specific need for a buffer around any route. Some specifically outlined that the safeguarding of the canal route to the south of Melksham is unjustified and is undeliverable as demonstrated by a historic planning application (submitted in 2012), which does not have Environment Agency and the need for policy flexibility on any safeguarded route should alternatives come forward.

### Policy 95: Flood risk

- **Groundwater Assessment ambiguity:** No guidance is included within the Local Plan or the Validation Checklist of when a Groundwater Assessment will be required. Further clarity required.
- **Expand policy to make is more effective:** Comments outlined that the policy should be expanded to include sources of flooding / flood risk away from flood zones. For instance, sewer flooding and flooding outside of floodplain, all sources of flooding should be represented. Environment Agency outline that too much focus has been placed on surface water flooding: The Policy is disproportionately surface-water focused.
- **Policy exceedance of national guidance in terms of betterment unjustified / undeliverable:** The requirement for all major development to achieve a 20% betterment on greenfield run-off rates exceeds the minimum currently expected from new development within national policy and supporting technical standards. No justification or assessment of impact is provided. The setting of a betterment figure that over-mitigates the impact of development results in proposals having to accommodate an unnecessary/ unrealistic volume of attenuation, reducing the amount of available developable land and site viability, requiring additional work to achieve this.
- **The SuDS requirement unjustified:** The policy is unjustified and inconsistent with national policy as it goes beyond national policy requirement that only major developments should incorporate SuDS unless there is clear evidence this would be inappropriate .
- **The surface water discharge hierarchy is inconsistent with national policy:** The surface water discharge hierarchy, as set out within the policy differs in order to that within national policy without justification. Some comments outlined the need for policy to direct development towards the top of the hierarchy in a prioritised list.

### Policy 96: Water resources

- **Lack of robust evidence to support the policy requirements:** The Environment Agency outline the need for robust evidence to support this policy, specifically the 85 litres per person per day mains water consumption requirement and that the existing river and groundwater quality status and waste water infrastructure have been evaluated when considering new allocations.

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- **Water consumption policy approach unjustified:** The Policy requires a predicted mains water consumption of no more than 85 litres per person per day. This is much lower than the existing standards (Building Regulations). This does not appear to have been properly assessed, including through the viability appraisal, or justified and evidence is required to justify this approach. This approach appears contrary to Wessex Water's Water Resource Management Plan.
- **Achievability of water consumption / all development challenge:** The effectiveness of the policy in reducing water consumption is questioned, as it can not control adaptations and changes to dwellings post occupation with other representations pointing out that in some instances, for example NHS and care facilities, a higher water consumption may be required. Other comments outlined that in order to achieve the water efficiency target, developers should use the 'Fittings Approach' (rather than 'Calculation Method') to increase the confidence levels that water efficient devices will be installed in new dwellings.
- **Water quality and SUDS policy requirements:** Comments, including those from the Environment Agency, outlined a need for policy to cover water quality and ensure nutrient neutrality is sufficiently included in policy. Policy coverage should also be included to ensure the objectives of the Water Framework Directive are reflected and the incorporation of SUDS policy wording strengthened.

### Policy 97: Contaminated land

- N/A

### Policy 98: Ensuring high quality design and place shaping

- **Duplicative and lengthy policy requirements:** The policy wording is duplicative and should be more concise. For instance, comments indicated that the policy contains several repeated references having regard to local context and local characteristics, which should not be duplicated. Other comments pointed out duplication with other policies within the local plan such as those for biodiversity, landscape and sustainable construction.
- **Local level design / design codes:** Comments pointed out that reference to the preparation of Design Codes is not included within the policy and it should be. This allows / the policy should enable local level design requirements and flexibility in this regard.

### Policy 99: Ensuring the conservation and enhancement of the historic environment

- **Policy is too restrictive:** The policy seeks to re-write the provisions of the National Planning Policy Framework in a more restrictive way. This is unjustified. The policy should closely reflect the National Planning Policy Framework as a matter of consistency. In some instances the policy goes beyond the provisions of the National Planning Policy Framework without any justification.
- **Consistency with National Policy:** Historic England outlined the importance of reflecting the National Planning Policy Frameworks stance on the degree of harm to the significance of a heritage asset, definition of conservation and the need for development to have a positive impact upon heritage assets.
- **Policy is internally inconsistent:** While the policy states that harm to heritage assets should be outweighed by public benefits at a level appropriate to the significance of the asset, this is overwritten by the opening sentence of the policy which states that "Development should conserve or enhance

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the historic environment”, and “Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance”. This is overly prescriptive and onerous.

### Policy 100: The Stonehenge, Avebury and associated sites World Heritage Site

- **Heritage Impact Assessment / assessment requirement:** The policy should set out information required to accompany applications likely to affect the significance of the World Heritage Site, including a need for applications to provide a Heritage Impact Assessment as per Historic England representation to judge impacts on the Outstanding Universal Value. It is important that proposals take full account of their impact upon the World Heritage Site and its setting, demonstrating that the development will have no individual, cumulative or consequential adverse effect upon the site and its OUV and this should be reflected within the policy.
- **World Heritage Site Management Plan:** There is a need for the policy to ensure proposals comply with the existing and future iterations of the World Heritage Site Management Plan. Comments indicated elements of the policy, such as vehicular spaces, were contrary to the existing management plan.
- **Conservation of Outstanding Universal Value:** Suggested that harm to the Outstanding Universal Value of the World Heritage Site cannot and should not be offset by public benefits as suggested in supporting text.

### Policy 101: Air quality

- **Air Quality Assessment required:** The policy should be amended to make clear all development that may harm a designated wildlife site via aerial deposition will require an air quality assessment as per Natural England representation.
- **Monitoring and effective implementation:** It is important the policy includes monitoring to judge the effectiveness of this policy such as measurements that show improvements to the quality and a reduction in size and number of the Air Quality Management Areas in Wiltshire which has increased in recent years. Solutions / suggested mitigation to address matters within the designated AQMAs should be considered within the policy.
- **Need to reduce car reliance not tackled and contrary to evidence:** Air quality issues will occur in urban areas, caused by car dependency, exacerbated by edge of town development, with poor provision of local services, lack of safe walking/cycle routes and poor public transport provision. The Transport policies are currently deficient as they do not take forward the interventions recommended in the Atkins transport evidence base. Transport policies need to be updated to reflect these comments with some comments indicating that this air quality policy should cover this.

## Council response

As introduced within the introduction to main issues, Council responses have been issued in some circumstances where this is considered helpful to provide context and to introduce and cross reference to other documents that have been prepared to help guide the reader to further information on matters raised through the consultation. Responses have not been issued to all matters raised in the interests of proportionality and on the understanding that in

## Main issues: Delivering the spatial objectives, environment policies

many cases, where more specific and detailed main issues have been raised by consultees, the details can be borne out in the examination. Council responses will also not repeat matters reported in responses elsewhere within this document, such as responses to matters raised by prescribed bodies and neighbouring authorities or against the evidence base and process of how the plan has been prepared as reported within Table 3.16.

### **Policy 89: Biodiversity Net Gain**

In line with legislation and national planning policy, the biodiversity net gain policy (BNG) guides development towards enhancing the natural and local environment. The overarching aim is to ensure development leaves biodiversity in a measurably better state than before, in line with the intentions of the Environment Act 2021, alongside enhancing the provision of ecosystem services. The viability assessment<sup>114</sup> prepared to inform the Local Plan tested the financial implications of the criteria contained within this policy, namely the requirement for at least 20% BNG.

Following the drafting of this policy the mandatory requirement for biodiversity net gain came into place on 12 February 2024 for Town and Country Planning Act development, subject to certain transitional provisions and exemptions, including a temporary exemption for non-major development until 2 April 2024. In February 2024 Planning Practice Guidance (PPG) on BNG was then updated outlining that "*plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain... unless justified*". In response to the PPG, utilising the justification criteria outlined within PPG (namely local need and opportunities for a higher percentage alongside any impacts on viability for development), further work is being undertaken to inform the requirement for 20% BNG including looking at a sample of allocated sites. This will be set out in a topic paper and is intended to assist the examination process.

In light of changes at the national level in relation to BNG since publication of the Plan consideration will be given to the potential for changes to Policy 89. These will be considered as part of ongoing engagement with Natural England and will be reflected within a SOCG being prepared.

### **Policy 91: Conserving and enhancing Wiltshire's landscapes**

National Landscape boards, in their response to the consultation, highlighted the new duty to 'seek to further' the statutory National Park / National Landscape purposes placed on 'relevant authorities' by the recently amended Section 11A of the National Parks & Access to the Countryside Act 1949 / the amendment in section 245 of LU&R Act 2023. This is a topic, among others, that it is intended to be covered within a Statement of Common Ground (SOCG) with the National Landscape boards to assist the examination in this regard.

### **Policy 95: Flood risk**

Further information on matters raised by the Environment Agency in relation to required updates to the existing Level 1 Strategic Flood Risk Assessment (and Level 2 as identified / required) can be found within Table 3.16

<sup>114</sup> [Assessment of Local plan viability and the review of the Wiltshire Community Infrastructure Levy Charging Schedule Client: Wiltshire Council](#), Urba and Porter Planning Economics (September 2023)

## Main issues: Delivering the spatial objectives, environment policies

### **Policy 96: Water resources**

In response to the Environment Agency's representations, as detailed within the main issues within Table 3.16, a Water Cycle Study (WCS) is currently being prepared by JBA consultants. The report is expected to outline the defensibility of the Council's position on water efficiency standards in all new development, as established in draft Policy 96 (Water resources).

### **Policy 100: The Stonehenge, Avebury and associated sites World Heritage Site**

There has not been and will not be a buffer zone defined for the World Heritage Site. Instead, the Council is currently in the process of developing a setting study for the World Heritage Site which is due to be complete in summer 2025. This study will define the significant views and sightlines in and outside of the World Heritage Site. The study will go through public consultation prior to being adopted as an Supplementary Planning Document.

### 3.2.12 Main Issues: Local Plan Appendices (A-E)

**3.51** Presented below are the main issues raised by the representations with regards Local Plan Appendices A-E, namely:

- Appendix A: Schedule of policies
- Appendix B: The settlement boundary review methodology
- Appendix C: Housing Trajectories
- Appendix D: Wiltshire Core Strategy allocations
- Appendix E: Town centre and primary shopping area boundary maps

**3.52** Within the table are the main issues raised for matters related to the Appendices of the Local plan.

**3.53** Where representations have presented issues as per those reported against sections 1-5 of the draft Plan, these have not been repeated here. For instance, where a place specific policy and / or development management policy within section 4/5 has been referred to within representations again the local plan appendices, these have not been represented here. Please refer to the main issues presented against that specific place / policy to understand these place / site specific main issues.

### Main issues: Local Plan appendices

**Table 3.47 Local plan Appendices A-E main issues**

Main issues: Local Plan Appendices A-E
<p><b>Appendix A: Schedule of policies</b></p> <ul style="list-style-type: none"><li>• <b>Policy 25 Old Sarum Airfield:</b> Justification required as to how matters that previously justified the policy can be addressed without it and how the grade II* listed hangars on site that are on the Historic England Heritage at Risk Register might be tackled as per Historic England representation.</li><li>• <b>Policy BD1 Site allocation:</b> Table A.5 states The Brickworks Site, Purton, has been fully developed. Evidence showing that not all of the allocation has been developed can be provided. It should be re-instated as an allocated industrial site.</li><li>• <b>Wiltshire Housing Site Allocations Plan:</b> Appendix A omits policies from the Wiltshire Housing Site Allocations Plan DPD adopted in February 2020. The schedule should be kept up to date and confirm which allocations are to be retained.</li></ul>
<p><b>Appendix B: The settlement boundary review methodology</b></p>



## Main issues: Local Plan Appendices A-E

- **Consistency and clarity:** Areas which fall within a settlement boundary are explained as including 'built and commenced' areas, which is different to what is stated within paragraph 3.6 which says, 'reflecting what has been built'.

### Appendix C: Housing Trajectories

- **Lack of clarity, justification and effective monitoring:** The appendix provides no detail, for instance if the numbers are derived from outline, full or reserved matters applications, or whether a windfall allowance is included. The trajectory is not clearly evidenced or robust and it would be difficult to monitor the effectiveness of the local plan and housing land supply position using this housing trajectory.

### Appendix D: Wiltshire Core Strategy allocations

- **Wiltshire Housing Site Allocations Plan:** The allocations contained within the Wiltshire Housing Site Allocations DPD adopted in February 2020 must be read in conjunction with the core strategy as strategically important allocations. Appendix D should be updated to include these allocations which contribute to towards overall delivery of housing and employment growth.

### Appendix E: Town centre and primary shopping area boundary maps

- N/A



## 4 Appendix 1

- 4.1** This appendix is intended to address how the requirements of Regulation 22(1)(c) (i) to (iv) have been met and sets out:
- (i) Which bodies and persons the local planning authority invited to make representations under Regulation 18
  - (ii) How those bodies and persons were invited to make representations under Regulation 18
  - (iii) A summary of the main issues raised by the representations made pursuant to Regulation 18
  - (iv) How any representations made pursuant to Regulation 18 have been taken into account.
- 4.2** In addressing how these legislative requirements have been met this appendix will also, in part, signpost to other reports that have been prepared to demonstrate legislative conformity.

### Introduction

- 4.3** Public consultation under Regulation 18 of the Town and Country Planning (Local Planning)(England) Regulations 2012 took place in two stages.

#### Stage 1: Issues and opportunities consultation

- 4.4** This initial consultation involved consultation on the scope and content of the review of the Wiltshire Core Strategy (recast Wiltshire Local Plan), including inviting comment on the preparation of a Joint Spatial Framework with Swindon Borough Council, and took place over six weeks from 7 November to 19 December 2017<sup>115</sup>. 183 responses from 138 respondents were received to the on the Wiltshire Local Plan Review consultation paper and a total of 504 responses from 206 respondents were received by Wiltshire Council on the Swindon and Wiltshire Joint Spatial Framework<sup>116</sup>. In addition, approximately 120 people attended the parish briefings held as part of the consultation and 40 delegates attended the developers forum.

#### Stage 2: Wiltshire Local Plan Review consultation

- 4.5** This further consultation, taking place over eight weeks from 13 January to 9 March 2021<sup>117</sup>, was not on a draft Local Plan but on key components to inform one, including proposals for the scale and distribution of housing and employment growth across Wiltshire. Overall, more than 3,500 representations were made from circa 2,680 people and organisations. In addition, more than 1,300 people attended the live consultation events held as part of the consultation.

### Structure of Appendix 1

- 4.6** Section 2 of this Appendix sets out which bodies and persons were consulted and how that was undertaken.

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<sup>115</sup> in accordance with Regulation 18 ('preparation of a local plan') of the Town and Country Planning (Local Planning)(England) Regulations 2012

<sup>116</sup> Swindon Borough Council reported on the responses they received separately

<sup>117</sup> in accordance with Regulation 18 ('preparation of a local plan') of the Town and Country Planning (Local Planning)(England) Regulations 2012

- 4.7** Section 3 of this Appendix provides links to the reports that provide further information and summarise the main issues raised in response to these consultations and the response of the Council indicating how the comments were taken into account in the next stage of Plan preparation.
- 4.8** Section 4 of this Appendix sets out a conclusion on the efficacy of the Regulation 18 consultation process.

## Regulation 18: How consultation was undertaken

### Who was consulted and how was this undertaken?

#### Stage 1: Issues and opportunities consultation (7 November to 19 December 2017)

- 4.9** A wide range of methods <sup>118</sup> were used to raise awareness about the consultation and to encourage people to respond. This included sending email notifications to all contacts registered on Wiltshire Council's consultation database, a list of in excess of 5,200 emails and 340 letters (including the specific consultation bodies required by the Regulations). Similarly all parish and town councils were notified and a public notice placed in three local newspapers: the Salisbury Journal (1 November 2017), the Wiltshire Times (2 November 2017) and the Gazette and Herald (02 November 2017). As mentioned in the notification letters and press notice, the consultation documents were made available to view and download on the council's website with hard copies within the Council's main office hubs (Chippenham, Salisbury and Trowbridge) and at libraries. Other consultation methods included utilising a variety of existing networks such as Chairman's announcements at Area Board meetings around the county and publication of this information on 'Our Community Matters' webpage. A promotional video explaining the consultation and how to comment was also published on YouTube and promoted on Wiltshire Council's social media.
- 4.10** As part of the consultation four parish and town council briefing events, one each in Trowbridge, Royal Wootton Bassett, Chippenham and Salisbury, were held in November 2017. Notification about these events was sent out to all parish and town councils in advance of the consultation. The briefings were to explain the purpose of the consultation, the proposed approach to joint working with Swindon Borough Council and the conclusions of joint evidence papers commissioned on housing and employment needs whilst enabling attendees to gain a better understanding of the process and to become involved. An additional briefing was held in Swindon Borough Council. Similarly a Developers Forum formed part of the consultation to inform developers of the approach to joint working across the two councils and to explore issues of concern and how the respective local plan reviews could address these concerns. Invitations were sent to developers and agents with known interests in the area.
- 4.11** Consultees were able to respond to the consultation via post, email or via the Council's online consultation portal. A series of questions were set out for both the Wiltshire Local Plan Review consultation paper and the Swindon and Wiltshire Joint Spatial Framework Issues Paper to help assist respondents.
- 4.12** To meet the consultation requirements for a Sustainability Appraisal Scoping Report, the Sustainability Appraisal consultation was integrated within the Local Plan Review consultation and comments invited. In addition to the aforementioned advertisement undertaken as part of the wider issues and options consultation, a bespoke notification was also sent out to the statutory consultation bodies as listed under paragraph 4 of the Environmental Assessment of Plans and Programmes Regulations 2004, inviting them to comment on the consultation documents and accompanying evidence reports.

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<sup>118</sup> in accordance with the Council's Statement of Community Involvement (update 2015)

**4.13** A more detailed breakdown of how consultation was undertaken and who responded can be found within the consultation reports <sup>119</sup><sup>120</sup> <sup>121</sup> that were produced to document the process and findings of this consultation.

## Stage 2: Wiltshire Local Plan Review consultation (13 January to 9 March 2021)

**4.14** Due to the ongoing COVID-19 pandemic the consultation was carried out in line with the Council's adopted Statement of Community Involvement (SCI) <sup>122</sup> and Temporary Arrangements <sup>123</sup>. The temporary arrangements document represented a response to guidance <sup>124</sup> to Local Planning Authority's to review their SCI in accordance with Government advice aimed at preventing the spread of COVID-19. The consultation was also undertaken in full accord with The Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020. This emergency legislation changed the requirement under Regulation 35(1)(a) of The Town and Country Planning (Local Planning) (England) Regulations 2012 for councils to make copies of development plan documents available for inspection. The council could instead comply with Regulation 35(1)(a) by making development plan documents available on their website.

**4.15** A wide range of methods were used to raise awareness about the consultation and to encourage people to respond, these methods ensuring they reached stakeholders including specific consultation bodies, neighbouring local authorities, all parish and town councils, Wiltshire Councillors alongside individuals, community groups and organisations who are on the Council's mailing list including those who had previously requested to be notified on the progress of the Wiltshire Local Plan review. The methods used for contacting people included those outlined within Table 4.1.

**Table 4.1 Lists various means by which consultees were made aware of the Wiltshire Local Plan Review consultation.**

Consultation method
Notification emails sent to Spatial Planning mailing list (circa 1,500 recipients on mailing list)
Notification letters sent to Spatial Planning mailing list (circa 78 recipients on mailing list requested postal notifications)
Inclusion within Wiltshire Council email newsletter sent to residents on nine occasions (circa 23,000 recipients on mailing list)
Inclusion within Wiltshire Council email newsletter sent to businesses on three occasions (circa 3,500 recipients on mailing list)
Inclusion within newsletter sent to Wiltshire Council members on seven occasions (98 recipients on mailing list)
Inclusion within councillor briefing note no. 21-02

<sup>119</sup> [Wiltshire Local Plan Review Scope of the Plan \(Regulation 18 consultation\) Report of the Consultation Process](#), Wiltshire Council (February 2019); ([Appendices](#))

<sup>120</sup> [Wiltshire Local Plan Review Scope of the Plan \(Regulation 18 consultation\) Report of Parish Briefings](#), Wiltshire Council (February 2019)

<sup>121</sup> [Wiltshire Local Plan Review, Swindon Borough Local Plan Review, Scope of the Plan \(Regulation 18 consultation\) Report of Developer Forum](#), Wiltshire Council (February 2019)

<sup>122</sup> [Statement of Community Involvement](#), Wiltshire Council (July 2020)

<sup>123</sup> Statement of Community Involvement Temporary arrangements, Wiltshire Council (July 2020)

<sup>124</sup> Planning Practice Guidance: Plan Making <https://www.gov.uk/guidance/plan-making> (Paragraphs 077 & 078)

Consultation method
Inclusion within newsletter sent to Wiltshire town and parish councils on six occasions (circa 250 recipients on mailing list)
Social Media (reach 764,775) Information shared across 48 posts in total, 24 on Facebook and 24 on Twitter. This facilitated 1,017 clicks to the Wiltshire Local Plan Review consultation webpage, had a reach of 764,775, received 130,892 impressions and 290 retweets/shares.
Public notice placed within local newspapers covering the county, namely Wiltshire Times, Salisbury Journal and the Wiltshire Gazette and Herald.
Press releases: A series of six press releases were released and placed on the Wiltshire Council website, promoted on social media, and sent to a variety of sources including all Wiltshire Council members, Town & Parish councils along with local/regional and some national media.

- 4.16** As noted throughout the advertisement material, the consultation documents were made available to view on the Wiltshire Council website. Respondents were able to respond to the consultation via post, email or the use of online Microsoft Forms associated with each consultation paper. Arrangements were also put in place to allow people who did not have access to the internet to have hard copies sent to them by post. The consultation was also supported by an interactive portal map illustrating the preferred (Principal Settlements) and potential (Market Towns) development sites. The portal map was viewed a total of circa 4,690 times during the consultation period.
- 4.17** As part of the Local Plan Review consultation a series of 17 live online consultation events were held for communities and other stakeholders to attend. This included one event per Market Town and Principal Settlement and two rural events which encompassed all other Wiltshire villages and settlements. In total, more than 1,300 people attended the live consultation events.
- 4.18** A more detailed breakdown of how consultation was undertaken and who responded can be found within the consultation report <sup>125</sup> that was produced to document the process and findings of this consultation.

<sup>125</sup> [Wiltshire Local Plan Review Consultation January - March 2021 Consultation report and next steps](#), Wiltshire Council

# Regulation 18: Main issues raised and Council consideration

## Stage 1: Issues and opportunities consultation

- 4.19** A summary of the main issues raised as part of this issue and options consultation is provided within section 4 of the consultation report <sup>126</sup> published following the consultation. Similarly the main issues raised by attendees of the Parish Briefings (section 2.4<sup>127</sup>) and summarised feedback from the developer forum (section 2.4 <sup>128</sup>) is provided within the respective consultation reports.
- 4.20** Comments submitted as part of this consultation were taken into account as part of the Wiltshire Local Plan review process by informing:
- Amendments to the draft Sustainability Appraisal Scoping Report prior to commencing the sustainability appraisal of policies and proposals.
  - A review of proposed housing market area boundaries
  - Consideration of the future role and status of the Joint Spatial Framework
  - The development of alternative development strategies for each housing market area
  - The understanding of site availability and deliverability when considering specific locations for allocations in the local plan.
  - The review of adopted policies to maintain consistency and identify gaps in policy.
- 4.21** Further detail on how the issues and opportunities consultation helped to shape and inform the timeline of the Wiltshire Local Plan is included within section 2 of this report, documenting the plan production timeline. Here, information is also included on how subsequent rounds of informal consultation within 2018 and 2019 further informed the preparation of the Wiltshire Local Plan.

## Stage 2: Wiltshire Local Plan Review consultation

- 4.22** A summary of the main issues raised as part of this Wiltshire Local Plan Review consultation is provided within section 6 of the consultation report <sup>129</sup> published following the consultation with section 7 of that report then presenting a summary of main issues against key themes to assist in presenting some of the actions that were necessary to consider the findings of the consultation. Further detail on how this consultation helped to shape and inform the timeline of the Wiltshire Local Plan is included within section 2 of this report, documenting the plan production timeline.
- 4.23** The outcome from the consultation and the Main Issues raised were reported to Wiltshire Council's Cabinet on 29 June 2021, and 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.

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<sup>126</sup> [Wiltshire Local Plan Review Scope of the Plan \(Regulation 18 consultation\) Report of the Consultation Process](#), Wiltshire Council (February 2019); ([Appendices](#))

<sup>127</sup> [Wiltshire Local Plan Review Scope of the Plan \(Regulation 18 consultation\) Report of Parish Briefings](#), Wiltshire Council (February 2019)

<sup>128</sup> [Wiltshire Local Plan Review, Swindon Borough Local Plan Review. Scope of the Plan \(Regulation 18 consultation\) Report of Developer Forum](#), Wiltshire Council (February 2019)

<sup>129</sup> [Wiltshire Local Plan Review Consultation January - March 2021 Consultation report and next steps](#), Wiltshire Council



- 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.

**4.24** These matters were considered in further detail through the continued evidence gathering stages of the preparation of the draft Local Plan. Following the consultation that took place in early 2021 significant work was undertaken to shape the draft Local Plan and the evidence underpinning it, with key changes reported to [Cabinet in July 2023](#) prior to the Regulation 19 consultation. These key changes included the following:

- An updated Local Housing Need Assessment was completed, which addressed 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 Local Plan was 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).
- Employment forecasts were updated to inform the need for employment land. A 'central scenario' was used, which considers the mid-point between different forecasts by Cambridge Econometrics and Oxford Economics that assessed the impacts of both COVID-19 and Brexit. This supports the overall housing need for Wiltshire indicating a balance between workers and homes.
- A revised spatial strategy was prepared that is in line with the settlement strategy and sets out levels of growth for Wiltshire's main settlements. This considers the updated needs assessments, consultation responses and evidence on ability of settlements to accommodate further growth.
- Transport assessments were 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 Local Plan.
- 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 was prepared to demonstrate the sources of new homes over the plan period and to demonstrate a five-year housing land supply.
- Revised methodologies were developed to carry out the duty of providing neighbourhood plans with housing requirements for their review and preparation.
- Review of policies to support vitality of rural settlements, was carried out to allow for affordable housing, employment and community facilities.
- A renewable energy study for Wiltshire was completed, which has informed revised policy to support renewable energy schemes locally.
- A Wiltshire Open Space Study was completed to support the use of new open space standards across the county through updated policy.

- New policies were 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.
- Viability Assessment was 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.

## Conclusion

**4.25** The summary above explains which bodies and persons the local planning authority invited to make representations under Regulation 18 and how they were invited to make representations, having regard to the plan-making Regulations and the approach set out within Council's Statement of Community Involvement at the time of each consultation. Links have also been provided to summaries and full reports of the main issues raised by the representations made pursuant to Regulation 18, and explanation provided of how these were taken into account in the preparation of the Local Plan. The Council has therefore met the requirements of Regulation 22(1)(c) (i) to (iv).



## 5 Appendix 2

**5.1** This appendix addresses the requirements of Regulation 22(1)(c)(v):

(v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations.

### Introduction

**5.2** In July 2023, Wiltshire Council's Cabinet ([11 July 2023](#)) and Full Council ([18 July 2023](#)) approved that the draft Local Plan may proceed to Regulation 19 pre-submission consultation. The proposed submission Regulation 19 version of the Local Plan, associated Policies Map and supporting documents, including the sustainability appraisal, were published in accordance with Regulation 19 of the TCPR for an eight week consultation period from Wednesday 27 September 2023 to Wednesday 22 November 2023. This Appendix is intended to set out who was consulted and how this was undertaken alongside providing information on the response to the consultation and the main issues raised. Schedule 1 of this Appendix provides further examples of the publication/notification materials produced.

**5.3** The information contained within this appendix explains which bodies and persons were invited to make representations under Regulation 19 and how in accordance with the plan-making Regulations<sup>130</sup> and the Council's Statement of Community Involvement<sup>131</sup>. This Appendix also sets out the number of representations made pursuant to regulation 20 whilst the report as a whole summarises the main issues raised in those representations. The Council has therefore met the requirements of Regulation 22(1)(c) (v).

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<sup>130</sup> The Town and Country Planning (Local Planning) (England) Regulations 2012

<sup>131</sup> [Statement of community involvement](#), Wiltshire Council (July 2020)

## Regulation 19: Who was consulted and how was that undertaken?

**5.4** In accordance with the Statement of Community Involvement <sup>132</sup> and the legislative criteria governing the regulatory stages of plan making <sup>133</sup>, notifications were sent inviting comments on the draft Local Plan that included the following organisations, groups and individuals being contacted:

- Specific consultation bodies (including Environment Agency, Natural England, Historic England, NHS and, Highways England)
- Neighbouring local authorities
- All parish and town councils
- Wiltshire Councillors
- Individuals, community groups and organisations who have previously requested to be informed about updates relating to Wiltshire planning policy and the Wiltshire Local Plan

**5.5** Consultees were made aware or formally notified of the consultation through a variety of means as outlined within Table 5.1.

**Table 5.1 Lists various means by which consultees were made aware of the Wiltshire Local Plan Regulation 19 consultation**

Consultation method	Further information
<p><b>Notification email or letter sent to those on Strategic Planning mailing list</b></p> <p>(over 8,000 emails or letters sent to recipients on mailing lists)</p>	<p>Notification sent to consultee's and organisations on Strategic Planning mailing list including those who have requested to be kept informed of the progress of Local Plan as the plan has progressed.</p> <p>The initial notification email contained information with regards the local plan, how to respond and the availability of documents (linking to the webpage) whilst also attaching copies of both the public notice and statement of representation procedure.</p> <ul style="list-style-type: none"> <li>• Email notification sent 27/09/23 is provided at Schedule 1 of this Appendix</li> </ul>
<p><b>Inclusion within Wiltshire Council email newsletter sent to residents</b></p> <p>(over 27,000 recipients on mailing list)</p>	<p>Information advising residents of the consultation was included within newsletters sent to residents on the mailing list twelve times between the dates 21/08/23 and 17/11/23.</p> <ul style="list-style-type: none"> <li>• Email newsletter sent 27/09/23 is provided at Schedule 1 of this Appendix</li> </ul>
<p><b>Inclusion within Wiltshire Council email newsletter sent to businesses</b></p> <p>(over 5,400 recipients on mailing list)</p>	<p>Information advising businesses of the consultation was included within newsletter sent to businesses on the mailing list on 25/08/23.</p>
<p><b>Inclusion within email newsletter sent to Wiltshire Council members</b></p>	<p>Information advising Wiltshire Council members of the consultation was included within newsletters sent to members on the mailing list eleven times between the dates 21/08/23 and 17/11/23.</p>

<sup>132</sup> [Statement of community involvement](#), Wiltshire Council (July 2020)

<sup>133</sup> The Town and Country Planning (Local Planning) (England) Regulations 2012

Consultation method	Further information
(over 115 recipients on mailing list)	To encourage communities to attend the in-person events, posters were produced for each event that could be printed and put up in places such as community noticeboards. The full list of events and the posters to download were contained within the email.
<b>Inclusion within email newsletter sent to Wiltshire town and parish councils</b>  (over 250 recipients on mailing list)	Information advising Wiltshire Council town and parish councils of the consultation was included within newsletters sent to all town and parish councils nine times between the dates 21/08/23 and 17/11/23. <ul style="list-style-type: none"> <li>• Email newsletter sent 27/09/23 is provided at Schedule 1 of this Appendix</li> </ul> To encourage communities to attend the in-person events, posters were produced for each event that could be printed and put up in places such as community noticeboards. The full list of events and the posters to download were contained within the email. <ul style="list-style-type: none"> <li>• Example poster is provided at Schedule 1 of this Appendix</li> </ul>
<b>Social Media</b>  (reach 31,400)	Information advertising the consultation was shared across 35 posts in total, 18 on Facebook and 17 on Twitter between 26/09/23 to 30/11/23. This facilitated 488 clicks to the consultation webpage, had a reach of 31,400 and received 47,400 impressions.
<b>Public Notice</b>	Public notices were placed within local newspapers covering the county, namely the Wiltshire Times, Salisbury Journal and the Wiltshire Gazette and Herald. <ul style="list-style-type: none"> <li>• The public notice published during week commencing 18th September 2023 can be viewed at Schedule 1 of this Appendix.</li> </ul>
<b>Press releases</b>	A series of press releases were issued advertising the Wiltshire Local Plan Review consultation, namely: <ul style="list-style-type: none"> <li>• 21/08/23: "Local Plan consultation launches next month with schedule of in-person and online events" <a href="#">[available to view via this link]</a> [Press release provided at Schedule 1 of this Appendix]</li> <li>• 22/09/23: "Local Plan consultation to begin next week, with events starting in October" <a href="#">[available to view via this link]</a> [Press release provided at Schedule 1 of this Appendix]</li> <li>• 29/09/23: "First Local Plan consultation in-person events begin on Monday" <a href="#">[available to view via this link]</a></li> <li>• 06/10/23: "Local Plan consultation events visit Marlborough, Malmesbury, Corsham, Royal Wootton Bassett and Trowbridge next week" <a href="#">[available to view via this link]</a></li> <li>• 13/10/23: "Final Local Plan consultation events to be held in Calne, Westbury, Salisbury, Tidworth and Warminster" <a href="#">[available to view via this link]</a></li> <li>• 23/10/23: "More than 2,000 people engage with Local Plan events - as consultation continues" <a href="#">[available to view via this link]</a></li> </ul> Each press release is placed on the Wiltshire Council website, promoted on social media, and sent to a variety of sources including all Wiltshire Council members, Town & Parish councils along with local/regional and some national media.

- 5.6** As noted throughout the advertisement material, the consultation documents were made available to view on the Wiltshire Council website and during normal office hours at the Council's main offices: Monkton Park (Chippenham), Bourne Hill (Salisbury) and County Hall (Trowbridge). The following documents: the draft Plan; the draft Sustainability Appraisal Report (incorporating requirements of the Environmental Assessment of Plans and Programmes Regulations 2004); the draft Habitat Regulations Assessment and; the most relevant 'planning for' evidence paper(s) were made available to view at the following libraries during normal opening hours: Amesbury, Bradford on Avon, Calne, Chippenham, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Pewsey, Royal Wootton Bassett, Salisbury, Tidworth, Tisbury, Trowbridge, Warminster, and Westbury. Electronic access to all submission documents was available at all Wiltshire Council libraries. Arrangements were also put in place to allow people who did not have access to the internet to have hard copies sent to them by post.
- 5.7** A statement of representations procedure (guidance note) explaining how to comment was produced for the consultation and could be viewed both online [[available here to download](#)] and in hard copy format at the locations referred to above. The statement of representation procedure also set out information including what the local plan was about, the period for submitting representations, the availability of documents, explanation as to the tests of soundness and how to submit comments. The representation form (produced broadly following the format recommended in the Planning Inspectorate's procedural guidance on local plan examinations) was attached as an appendix to this guidance document whilst also being made available on the consultation website [[available to download here](#)] alongside hard copies being available alongside the consultation material at deposit points.
- 5.8** Respondents were able to respond to the consultation via post, email or via the Council's consultation portal. The consultation portal enabled people to view the plan electronically, both via mobile and computer, and comment directly on the part(s) of the plan they wished to comment on. Instructions on how to use the consultation portal were provided on the consultation webpage [[available to view here](#)] alongside a short video demonstration [[available to view here](#)] on how to submit comments, also available via the Wiltshire Council YouTube channel. The consultation was also supported by an interactive version of the Plan created using ArcGIS StoryMaps [[available to view here](#)]. This enabled people to view the plan alongside an interactive policy map. By navigating to a part of the plan (e.g., site allocation) users were able to view proposals in detail to understand the exact extent and location of, for instance, site allocations and proposals around a specific place.

## Consultation events

- 5.9** As part of the consultation there were 16 drop-in events at libraries and leisure centres across the county. At each event there were a series of display boards (available at Schedule 1 of this Appendix) to inform attendees about the Local Plan and how to comment alongside copies of the proposed submission documents and several officers present to inform attendees about the consultation and answer any questions. A live webinar was also held on 10 October, a recording of which was made available on the Council's website and YouTube channel for those who may wish to view it back [[available to view here](#)]. The webinar included a question and answer session. Due to the volume of questions that were received, it was not possible for all of them to be answered during the event. The Council therefore published a document containing all of the questions that were submitted, and their answers<sup>134</sup>.

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<sup>134</sup> [Local Plan webinar event Q&A responses](#), Wiltshire Council (October 2023)



**5.10** The list of consultation events is provided in Table 5.2.

**Table 5.2 List of Regulation 19 consultation events and attendance**

Location	Date	Sign in attendance*
Amesbury (Amesbury Library, Smithfield Street, Amesbury SP4 7AL)	Monday 2 October	34
Bradford on Avon (Bradford on Avon Library, Bridge Street, Bradford on Avon BA15 1BY)	Monday 2 October	91
Chippenham (Olympiad Leisure Centre, Sadlers Mead, Chippenham SN15 3PA)	Tuesday 3 October	41
Melksham (Melksham Community Campus, Market Place, Melksham SN12 6ES)	Wednesday 4 October	50
Tisbury (The Nadder Centre, Weaveland Road, Tisbury SP3 6HJ)	Wednesday 4 October	32
Devizes (Devizes Library, Sheep Street, Devizes SN10 1DL)	Thursday 5 October	46
Marlborough (Marlborough Library, 91 High Street, Marlborough SN8 1HD)	Monday 9 October	85
Malmesbury (Malmesbury Library, 24 Cross Hayes Lane, Malmesbury SN16 9BG)	Monday 9 October	42
Online webinar	Tuesday 10 October	300+ attending live 500+ watching recording
Corsham (Springfield Community Campus, Beechfield Road, Corsham SN13 9DN)	Wednesday 11 October	23
Royal Wootton Bassett (Royal Wootton Bassett library, 11 Borough Fields, Royal Wootton Bassett SN4 7AX)	Wednesday 11 October	94
Trowbridge (Atrium, County Hall, Bythesea Road, Trowbridge BA14 8JN)	Thursday 12 October	58
Calne (Calne Library, The Strand, Calne SN11 0JU)	Monday 16 October	67
Westbury (Leighton Recreation Centre, Wellhead Lane, Westbury BA13 3PT)	Monday 16 October	24

Location	Date	Sign in attendance*
Salisbury (Salisbury Library, Market Walk, Salisbury SP1 1BL)	Tuesday 17 October	89
Tidworth (Tidworth Leisure Centre, Nadder Road, Tidworth SP9 7QN)	Wednesday 18 October	13
Warminster (Warminster Sports Centre, Woodcock Road, Warminster BA12 9DQ)	Wednesday 18 October	22
*not all attendees signed in so numbers represent an underestimate of attendance		

**5.11** Schedule 1 of this Appendix provides some examples of the publication/notification materials produced.

## Regulation 19: Response to consultation

**5.12** A considerable response was received to the consultation. Overall 10,743 comments were received from 3,053 submissions. The number of submissions broadly aligns with the number of items (e.g., an email / letter / email plus attachments / portal submission) received from consultees (note, a consultee may have submitted multiple items amounting to multiple submissions). The number of comments represents the breakdown of these submissions, following officer analysis, against parts of the plan to which they relate. For instance, a single submission (e.g., email) from a consultee may contain comments on 5 policies within the plan amounting to 5 comments. Officer judgement was often required to allocate comments to parts of the local plan within the consultation portal given a number of responses were received by means other than via the consultation portal or the representation form.

**5.13** All the comments can be viewed verbatim within the Council's consultation portal <sup>135</sup>. Within the consultation portal all representations can be viewed against the part of the Local Plan to which they relate whilst also being viewable based on who submitted comments.

**5.14** Two petitions were received as part of the consultation.

- Land North of Downton Road: One petition of 1386 signatures was received (comment number 2058)
- Bradford on Avon Market Town (Former golf course reserve site): One petition that received 1067 hand written signatures and 1063 electronic signatures (comment number 2146)

**5.15** A breakdown of the number of comments received against each part of the plan is contained within Table 5.3.

**Table 5.3 Provides a statistical overview of the number of comments received against each part of the plan**

Part of the plan	Number of comments received
What is this Plan?	86
How to use this Plan?	15
How has the Plan been prepared?	154
A spatial portrait of Wiltshire	16
A spatial vision for Wiltshire	109
Policy 1: Settlement strategy	188
Policy 2: Delivery strategy	713
Policy 3: Reserve sites for housing and broad locations for growth	127
Policy 4: Climate change strategy	82
Policy 5: Infrastructure delivery	86
Area strategies explained	33
Strategy for the Chippenham Housing Market Area	18

<sup>135</sup> Available via the Council's [consultation portal](#)

Part of the plan	Number of comments received
Policy 6: Chippenham Principal Settlement	56
Policy 7: Land South of Chippenham and East of Showell Farm	49
Policy 8: Chippenham Town Centre	11
Policy 9: Calne Market Town	22
Policy 10: Land off Spitfire Road, Calne	8
Policy 11: Land to the North of Spitfire Road, Calne	10
Policy 12: Corsham Market Town	17
Policy 13: Land South of Dicketts Road, Corsham	7
Policy 14: Devizes Market Town	16
Policy 15: Land at Devizes Wharf	9
Policy 16: Malmesbury Market Town	20
Policy 17: Melksham Market Town	38
Policy 18: Land East of Melksham, Melksham	15
Policy 19: Land off Bath Road, Melksham	10
Policy 20: Land North of the A3102, Melksham	10
Chippenham rural area	59
Strategy for the Salisbury Housing Market Area	24
Policy 21: Salisbury new community	71
Policy 22: Salisbury Principal Settlement	476
Policy 23: Land NE of Old Sarum, Salisbury	16
Policy 24: Land at Netherhampton Road Garden Centre, Salisbury	26
Policy 25: Land North of the Beehive Park & Ride, Old Sarum	11
Policy 26: Land North of Downton Road, Salisbury	102
Policy 27: Land South of Harnham, Salisbury	1436
Policy 28: Land West of Coombe Road, Salisbury	1392
Policy 29: Suitable Alternative Natural Greenspace, South Salisbury	49
Policy 30: Land East of Church Road, Laverstock	53
Policy 31: Salisbury Central Area	9
Policy 32: Salisbury skyline	4
Policy 33: The Maltings and Central Car Park	373
Policy 34: Churchfields Employment Area	360

Part of the plan	Number of comments received
Policy 35: Salisbury District Hospital campus	7
Policy 36: Amesbury Market Town	17
Policy 37: Boscombe Down	5
Policy 38: Porton Down	6
Policy 39: Tidworth and Ludgershall Market Town	6
Policy 40: Land South East of Empress Way, Ludgershall	10
Salisbury rural area	35
Policy 41: Land at Bulbridge Estate, Wilton	3
Policy 42: Land at Dead Maid Quarry Employment Area, Mere	1
Policy 43: Land safeguarded for education at Tanner's Lane, Shrewton	5
Strategy for the Swindon Housing Market Area	17
Policy 44: Marlborough Market Town	45
Policy 45: Land at Chopping Knife Lane, Marlborough	24
Policy 46: Land off Barton Dene, Marlborough	49
Policy 47: Royal Wootton Bassett Market Town	46
Policy 48: Land at Marsh Farm, Royal Wootton Bassett	15
Policy 49: Land at Midge Hall Farm, Royal Wootton Bassett	18
Policy 50: Land West of Maple Drive, Royal Wootton Bassett	6
Policy 51: Land at Woodshaw, Royal Wootton Bassett	18
Swindon rural area	38
Strategy for the Trowbridge Housing Market Area	22
Policy 52: Trowbridge Principal Settlement	51
Policy 53: Land North-East of Hilperton, Trowbridge	59
Policy 54: North Trowbridge Country Park	24
Policy 55: Land at Innox Mills, Trowbridge	8
Policy 56: Trowbridge Central Area	3
Policy 57: Bradford on Avon Market Town	34
Policy 58: Warminster Market Town	20
Policy 59: Land at Brook Street	3
Policy 60: Westbury Market Town	26

Part of the plan	Number of comments received
Policy 61: Land West of Mane Way, Westbury	6
Policy 62: Land at Bratton Road, Westbury	10
Policy 63: Westbury Country Park	6
Trowbridge rural area	27
Delivering the spatial objectives	6
Introduction	10
Economic section (overall / general comment)	2
Policy 64: Additional employment land	43
Policy 65: Existing employment land	26
Policy 66: Military establishments	9
Policy 67: Sequential test and retail impact assessment	5
Policy 68: Managing town centres	13
Policy 69: Tourism and related development	11
Policy 70: Sustainable transport	468
Policy 71: Transport and new development	507
Policy 72: Development impacts on the primary and major road networks	423
Policy 73: Transport: demand management	411
Policy 74: Movement of goods	21
Policy 75: Strategic transport network	425
Social section (overall / general comment)	3
Policy 76: Providing affordable homes	73
Policy 77: Rural exceptions sites	25
Policy 78: Meeting Wiltshire's housing needs	67
Policy 79: First Homes exception sites	8
Policy 80: Self and custom build housing	55
Policy 81: Community facilities	13
Policy 82: Housing in the countryside	24
Policy 83: Health and wellbeing	33
Policy 84: Public open space and play facilities	37
Environment section (overall / general comment)	2
Policy 85: Sustainable construction and low carbon energy	94

Part of the plan	Number of comments received
Policy 86: Renewable energy	24
Policy 87: Embodied carbon	55
Policy 88: Biodiversity and geodiversity	135
Policy 89: Biodiversity net gain	117
Policy 90: Woodland, hedgerows, and trees	43
Policy 91: Conserving and enhancing Wiltshire's landscapes	89
Policy 92: Conserving and enhancing dark skies	33
Policy 93: Green and blue infrastructure	39
Policy 94: Wiltshire's canals and the boating community	20
Policy 95: Flood risk	48
Policy 96: Water resources	71
Policy 97: Contaminated land	3
Policy 98: Ensuring high quality design and place shaping	44
Policy 99: Ensuring the conservation and enhancement of the historic environment	32
Policy 100: The Stonehenge, Avebury and associated sites World Heritage Site	13
Policy 101: Air quality	12
Appendix A Schedule of policies	19
Appendix B The settlement boundary review methodology	8
Appendix C Housing trajectory	4
Appendix D Wiltshire Core Strategy allocations	4
Appendix E Town centre and primary shopping area boundary maps	0
Sustainability Appraisal	59

## Regulation 19: Main issues raised and Council response

**5.16** A summary of the main issues raised in response to the consultation is contained within Section 3 of this report <sup>136</sup>. More comprehensive tables of key issues have also been provided within Schedule 2 of this Appendix summarising key elements of what stakeholders have said against each part of the plan. These more detailed key issues are intended to provide a little more information about what consultees have said against each part of the plan and have informed the formulation of the main issues. For the key issue tables contained at Schedule 2, every effort has been made to include information on who has raised each issue to provide further context.

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<sup>136</sup> in accordance with the requirements to provide a summary of the main issues made pursuant to regulation 20 as per Regulation 22(1)(c)(v)



## Schedule 1: Extracts of Regulation 19 consultation advertisement

**5.17** Schedule 1 of Appendix 2 contains some extracts of the advertisement material produced as part of undertaking the Regulation 19 consultation. Schedule 1 contains the following information:

1. Notification email sent 27/09/23 to those on Strategic Planning mailing list
2. Residents email newsletter sent 27/09/23
3. Town and Parish Council email newsletter sent 27/09/23
4. Poster provided to print off to advertise events (Calne example)
5. Public notices placed within local newspapers (Wiltshire Times, Salisbury Journal and the Wiltshire Gazette and Herald) during week commencing 18th September 2023
6. Press release published 21/08/23 "Local Plan consultation launches next month with schedule of in-person and online events"
7. Press release published 22/09/23 "Local Plan consultation to begin next week, with events starting in October"
8. Display boards available at drop in events held at libraries and leisure centres across Wiltshire

# Notification email sent 27/09/23 to those on Strategic Planning mailing list

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## **Consultation on the pre-submission draft Wiltshire Local Plan**

Wiltshire Council has published the draft Wiltshire Local Plan (Local Plan), along with accompanying evidence reports, for formal consultation. The Local Plan sets out the vision and framework for housing, infrastructure and land for employment growth for the next 15 years. Once adopted, all planning applications will be determined against the Plan, making it the most important place-shaping document for Wiltshire.

Comments are invited on the Local Plan and supporting evidence base documents during the 8 week consultation period, which runs from **9am on Wednesday 27 September until 5pm on Wednesday 22 November 2023**.

In-person events are being held across the county to enable you to find out more information as part of the consultation. You can just turn up to the in-person events, there is no need to book. There will also be an online webinar event on Tuesday 10 October, and you must register beforehand to attend the online event. To see the full list of in-person events or to register for the online webinar event, see [www.wiltshire.gov.uk/local-plan](http://www.wiltshire.gov.uk/local-plan). Officers will be available during all sessions to answer questions about the Local Plan and we would encourage people to attend and find out more about what the Local Plan proposes in their area.

### **How to respond**

The Local Plan and supporting evidence documents are available to view and download at [www.wiltshire.gov.uk/local-plan](http://www.wiltshire.gov.uk/local-plan) from 9am on Wednesday 27 September, and people can also download a representation form and a simplified guidance note from this page. The guidance note, alongside the public notice that was published in local newspapers, have been attached to this email.

We welcome your comments via the following means:

- Online via the council's dedicated [consultation portal](#). This is the most efficient and effective way to make representations. Further information on how to use the portal can be found at [www.wiltshire.gov.uk/local-plan](http://www.wiltshire.gov.uk/local-plan)
- By email using the representation form available at [www.wiltshire.gov.uk/local-plan](http://www.wiltshire.gov.uk/local-plan) and returned to [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk)  
By post in writing by completing a representation form and submitting this to:

Spatial Planning  
Planning Directorate  
Wiltshire Council  
County Hall  
Bythesea Road  
Trowbridge  
Wiltshire  
BA14 8JN.

Please note that copies of all comments (including your personal details) will be made available for the public to view and therefore cannot be treated as confidential. Anonymous representations cannot be accepted.

Copies of all the consultation documents can be viewed during normal opening hours at the Council's main offices at Monkton Park in Chippenham, Bourne Hill in Salisbury, and County Hall in Trowbridge.

The following documents: the Local Plan; the draft Sustainability Appraisal Report and the draft Habitat Regulations Assessment, will be made available to view at the following libraries during normal opening hours:

- Amesbury Library, Smithfield Street, Amesbury, SP4 7AL
- Bradford on Avon Library, Bridge Street, Bradford on Avon, BA15 1BY
- Calne Library, The Strand, Calne, SN11 0JU
- Chippenham Library, Timber Street, Chippenham, SN15 3EJ
- Springfield Community Campus, Beechfield Road, Corsham, SN13 9DN
- Devizes Library, Sheep Street, Devizes, SN10 1DL
- Malmesbury Library, 24 Cross Hayes, Malmesbury, SN16 9BG
- Marlborough Library, 91 High Street, Marlborough, SN8 1HD
- Melksham Community Campus, Market Place, Melksham, SN12 6ES
- Pewsey Library, Aston Close, Pewsey, SN9 5EQ
- Royal Wootton Bassett Library, Borough Fields, Royal Wootton Bassett, SN4 7AX
- Salisbury Library, Market Walk, Salisbury, SP1 1BL
- Tidworth Library, Tidworth Leisure Centre, Nadder Road, Tidworth, SP9 7QA
- Tisbury Library, Nadder Community Campus, Tisbury, SP3 6HJ
- Trowbridge Library, County Hall, Bythesea Road, Trowbridge, BA14 8JN
- Warminster Library, Three Horseshoes Walk, Warminster, BA12 9BT
- Westbury Library, Westbury House, 15 Edward Street, Westbury, BA13 3BD

Information on library opening times can be found at: <https://apps.wiltshire.gov.uk/librariesinformation>.  
Electronic access to all submission documents will be available at all Wiltshire Council libraries.

Following the consultation, the council will consider the comments received before submitting the Local Plan and supporting evidence to the Secretary of State for examination. All comments received during this consultation will be passed on to the appointed independent Planning Inspector at that stage.

Any representation received may be accompanied by a request to be notified at a specific address of any of the following: that the Local Plan has been submitted to the Secretary of State for independent examination; that the Inspector's Report (including any recommendations) into the Local Plan has been published; and that the Local Plan has been adopted.

Should you require further information, please email: [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk) or call 01225 713223.

If you no longer wish to receive emails to do with the Local Plan, please let us know by emailing [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk).

### Spatial Planning Services

## Wiltshire Council

Email: [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk)

Local Plan review consultation webpage: [www.wiltshire.gov.uk/local-plan](http://www.wiltshire.gov.uk/local-plan)

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27 September 2023



# Wiltshire Council LOCAL PLAN

## The Local Plan consultation begins today

The consultation for the Wiltshire Local Plan begins today, Wednesday 27 September, with in-person events being held across the county to enable you to find out more.

We are holding 16 drop-in events at libraries and leisure centres around Wiltshire and a live webinar-style event on Microsoft Teams. You can just turn up to the in-person events, but you'll need to [register beforehand for the online event](#).

If you cannot make your local in-person event, you are welcome to attend any of the others to discuss the Plan and your own area – all events are open to all.

The Local Plan consultation ends at 5pm on Wednesday 22 November. To find out more, see the timetable of events, and to sign up for the online event, [visit our website](#).



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27 September 2023



**The Local Plan consultation begins today – please share with your communities**

The consultation for the Wiltshire Local Plan begins today, Wednesday 27 September, with in-person events being held across the county to enable your communities to find out more.

We are holding 16 drop-in events at libraries and leisure centres around Wiltshire and a live webinar-style event on Microsoft Teams. People can just turn up to the in-person events, but they'll need to [register beforehand for the online event](#).

To encourage your communities to attend the in-person events, we have produced a poster for each event that can be printed and put up in places such as community noticeboards. You can see a full list of the events and the posters to download at the end of this email.

If you cannot make your local in-person event, you are welcome to attend any of the others to discuss the Plan and your own area – all events are open to all.

The Local Plan consultation ends at 5pm on Wednesday 22 November. To find out more and to sign up for the online event, people should [visit our website](#).

### Timetable of events

All in-person events are 3pm-7pm except Westbury, which takes place between 4.30pm-8.30pm.

Closest event for residents of	Date	Location	Download the event poster
Members introduction (pre consultation start)	Tuesday 26 September	Teams meeting	No poster
Amesbury, Bulford, Durrington, Great Wishford, Porton, Shrewton, Tilshead and The Winterbournes	Monday 2 October	Amesbury Library, Smithfield Street, Amesbury SP4 7AL	<a href="#">Download the Amesbury poster</a>
Bradford on Avon, Holt, Westwood and Winsley	Monday 2 October	Bradford on Avon Library, Bridge Street, Bradford on Avon BA15 1BY	<a href="#">Download the Bradford on Avon poster</a>
Chippenham, Christian Malford, Hullavington, Kington St Michael, Sutton Bengler and Yatton Keynell	Tuesday 3 October	Olympiad Leisure Centre, Sadlers Mead, Chippenham SN15 3PA	<a href="#">Download the Chippenham poster</a>
Melksham, Atworth, Bowerhill, Seend, Semington, Shaw and Whitley and Steeple Ashton	Wednesday 4 October	Melksham Community Campus, Market Place, Melksham SN12 6ES	<a href="#">Download the Melksham poster</a>
Tisbury, Mere, Fovant, Hindon and Ludwell	Wednesday 4 October	The Nadder Centre, Weaveland Road, Tisbury SP3 6HJ	<a href="#">Download the Tisbury and Mere poster</a>
Devizes, Bromham, Market Lavington, Potterne, Rowde, Urchfont, West Lavington, Littleton Pannell and Worton	Thursday 5 October	Devizes Library, Sheep Street, Devizes SN10 1DL	<a href="#">Download the Devizes poster</a>
Marlborough, Aldbourne, Baydon, Broad Hinton, Ramsbury, Pewsey, Burbage, Great Bedwyn, Shalbourne and Upavon	Monday 9 October	Marlborough Library, 91 High Street, Marlborough SN8 1HD	<a href="#">Download the Marlborough poster</a>

Malmesbury, Ashton Keynes, Crudwell, Great Somerford, Oaksey and Sherston	Monday 9 October	Malmesbury Library, 24 Cross Hayes Lane, Malmesbury SN16 9BG	<a href="#">Download the Malmesbury poster</a>
Online webinar covering all of Wiltshire	Tuesday 10 October	Online	No poster
Corsham, Box, Coleme and Rudloe	Wednesday 11 October	Springfield Community Campus, Beechfield Road, Corsham SN13 9DN	<a href="#">Download the Corsham poster</a>
Royal Wootton Bassett, Cricklade, Lyneham and Purton	Wednesday 11 October	Royal Wootton Bassett library, 11 Borough Fields, Royal Wootton Bassett SN4 7AX	<a href="#">Download the Royal Wootton Bassett poster</a>
Trowbridge, Hilperton, North Bradley and Southwick	Thursday 12 October	Atrium, County Hall, Bythesea Road, Trowbridge BA14 8JN	<a href="#">Download the Trowbridge poster</a>
Calne, Derry Hill and Studley	Monday 16 October	Calne Library, The Strand, Calne SN11 0JU	<a href="#">Download the Calne poster</a>
Westbury, Dilton Marsh and Bratton	Monday 16 October	Leighton Recreation Centre, Wellhead Lane, Westbury BA13 3PT	<a href="#">Download the Westbury poster</a>
Salisbury, Alderbury, Broad Chalke, Coombe Bissett, Dinton, Downton, Laverstock and Ford, Morgan's Vale, Woodfalls, Pitton, Whiteparish, Wilton and Winterslows	Tuesday 17 October	Salisbury Library, Market Walk, Salisbury SP1 1BL	<a href="#">Download the Salisbury poster</a>
Tidworth, Ludgershall, Collingbourne Ducis and Netheravon	Wednesday 18 October	Tidworth Leisure Centre, Nadder Road, Tidworth SP9 7QN	<a href="#">Download the Tidworth and Ludgershall poster</a>
Warminster, Chapmanslade, Codford, Corsley, Heytesbury and Sutton Veny	Wednesday 18 October	Warminster Sports Centre, Woodcock Road, Warminster BA12 9DQ	<a href="#">Download the Warminster poster</a>



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## Poster provided to print off to advertise events (Calne example)

  
SCAN ME



**Wiltshire Council**  
**LOCAL PLAN**  
**CONSULTATION**

**Monday 16 October, 3pm - 7pm**

**Come to your local drop-in event at**  
**Calne Library, The Strand, Calne SN11 0JU**

Closest event for Calne, Derry Hill and Studley communities.

The consultation runs from Wednesday 27  
September to Wednesday 22 November 2023.  
To find out more and to have your say,  
go to [www.wiltshire.gov.uk/local-plan](http://www.wiltshire.gov.uk/local-plan)

**Wiltshire Council**



# Public notices placed within local newspapers (Wiltshire Times, Salisbury Journal and the Wiltshire Gazette and Herald) during week commencing 18th September 2023

## Planning and Compulsory Purchase Act 2004

### The Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulation 19)

### The Environmental Assessment of Plans and Programmes Regulations 2004

#### Notice of Publication of the draft Wiltshire Local Plan

Notice is hereby given that Wiltshire Council has published the draft Wiltshire Local Plan ("the draft Plan") which is a Development Plan Document, for a formal 8-week consultation period beginning on **Wednesday 27 September 2023**, during which representations can be made.

Following consultation, the Council will register and consider the comments received before submitting the draft Plan to the Secretary of State for Levelling up, Housing and Communities.

The draft Plan has been informed by consultations that took place between 2017 and 2021 and is a review of the current Wiltshire Core Strategy, building on existing objectives and spatial strategy to address Wiltshire's needs for new homes, jobs and infrastructure over the period 2020 to 2038. It includes proposals for new allocations for housing and employment. In preparing the draft Plan, existing Wiltshire Core Strategy policies and those retained from the former district councils have been reviewed and either deleted or incorporated and/or updated into the draft Plan. If adopted the draft Plan will form part of the development plan for Wiltshire and guide decisions on future development.

The proposed submission documents include: the draft Plan, the draft Sustainability Appraisal report (incorporating requirements of the Environmental Assessment of Plans and Programmes Regulations 2004), the draft Habitat Regulations Assessment and a number of other supporting documents. In line with the Council's Statement of Community Involvement the consultation period allows for comments to also be made on its draft Sustainability Appraisal report.

The period for submitting representations relating to the draft Plan begins **9am Wednesday 27 September 2023** and lasts for 8 weeks, closing at **5pm on Wednesday 22 November 2023**. Representations received beyond this date may not be considered. A statement of the representations procedure (guidance note) explaining how to comment can be viewed alongside the proposed submission documents. Please note that copies of all comments (including your personal details) will be made available for the public to view, and therefore cannot be treated as confidential. Anonymous comments cannot be accepted.

The proposed submission documents can be viewed at: [www.wiltshire.gov.uk/local-plan](http://www.wiltshire.gov.uk/local-plan) and during normal office hours at the Council's main offices: Monkton Park (Chippenham), Bourne Hill (Salisbury) and County Hall (Trowbridge).

The following documents: the draft Plan; the draft Sustainability Appraisal Report (incorporating requirements of the Environmental Assessment of Plans and Programmes Regulations 2004) and; the draft Habitat Regulations Assessment, will be made available to view at the following libraries during normal opening hours: Amesbury, Bradford on Avon, Calne, Chippenham, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Pewsey, Royal Wootton Bassett, Salisbury, Tidworth, Tisbury, Trowbridge, Warminster, and Westbury.

Electronic access to all submission documents will be available at all Wiltshire Council libraries.

Representations can be submitted via the following means:

- online via the Council's consultation portal accessible via this link: [www.wiltshire.gov.uk/local-plan](http://www.wiltshire.gov.uk/local-plan)
- by email using the form available at: [www.wiltshire.gov.uk/local-plan](http://www.wiltshire.gov.uk/local-plan) and returned to [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk); or
- by post in writing to: Spatial Planning, Planning Directorate, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

The form has an accompanying statement of the representations procedure (guidance note) to assist in its completion. Please use a separate form for each representation you wish to make.

Any representation may be accompanied by a request to be notified at a specified address (email/postal) of any of the following: that the draft Plan has been submitted to the Secretary of State for independent examination; that the Inspector's Report (including any recommendations) into the draft Plan has been published; and that the draft Plan has been adopted.

There will be a live webinar on Tuesday 10 October at 6:30pm to 8:00pm and 16 drop-in events held around the county where you can ask questions and gain further information about the consultation. More information on these events can be found at: [www.wiltshire.gov.uk/local-plan](http://www.wiltshire.gov.uk/local-plan).

If you require more information or would like to request copies of documents, please contact Spatial Planning via email ([spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk)), phone (01225 713223) or post to Spatial Planning, Planning Directorate, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN. Please note that there will be a fee for providing any documents requested.

Nic Thomas

Director of Planning

## Press release published 21/08/23 "Local Plan consultation launches next month with schedule of in-person and online events"

[Home](#) > [News and communications](#)

# Local Plan consultation launches next month with schedule of in-person and online events

**The consultation for the Wiltshire Local Plan begins on Wednesday 27 September, with in-person and an online event being held across the county to enable people to find out more and have their say**

Published 21 August 2023

The consultation for the Wiltshire Local Plan begins on Wednesday 27 September, with in-person and an online event being held across the county to enable people to find out more and have their say.

Wiltshire Council is holding 16 drop-in events at libraries and leisure centres around Wiltshire and a live webinar-style event on Thursday 10 October on Microsoft Teams.

The in-person events are informal drop-in sessions where people can meet officers and find out more about the Local Plan and how to respond to the consultation. The online session will feature a presentation, followed by an opportunity to ask questions; people should sign up for the online event beforehand on the council website.

The Local Plan sets out the vision and framework for housing, infrastructure and land for employment growth for the next 15 years. Once adopted, all planning applications will be determined against the Plan, making it the most important place-shaping document for Wiltshire.

Cllr Nick Botterill, Cabinet Member for Strategic Planning, said: "This is the final consultation stage for the Wiltshire Local Plan before the Examination in Public next year, and so it's important that people take the time to have their say. And we're giving them every opportunity to find out more, by holding 16 drop-in events at different venues around the county throughout the next month.

"We are also holding an online session, and people will be able to read all of the Local Plan documents on our website and at our main offices, and the Plan will also be available in many Wiltshire Council libraries. People can share their views through our online portal, and anyone without internet access can visit a library to use the computers there, or contact our team to get a written copy of the representation form and find out how to view the documents.

"This is the most ambitious and environmentally conscious Local Plan Wiltshire has ever produced, with zero carbon standards for new homes and policies to increase biodiversity at all new developments. We're also ensuring we only build the homes we need to over the Plan period to 2038 and no more, while also maximising brownfield sites and ensuring developments have their fair share of affordable homes.

"I'd urge anyone with an interest in the future of Wiltshire to take part in this consultation and share their views."

The consultation begins on Wednesday 27 September and ends at 23:59 on Wednesday 22 November. There are a series of drop-in events, and an online webinar - for dates and times, and to sign-up to the webinar, go to our [Local Plan webpage](#).

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## Press release published 22/09/23 "Local Plan consultation to begin next week, with events starting in October"

[Home](#) > [News and communications](#)

# Local Plan consultation to begin next week, with events starting in October

People in Wiltshire will be able to have their say on the Local Plan from next week, as the consultation begins on Wednesday 27 September, for eight weeks until Wednesday 22 November.

Published 22 September 2023

To enable as many people as possible to find out more about the Plan and how to submit representations, Wiltshire Council is holding 16 in-person drop-in sessions across the county and an online webinar event. To sign up for the webinar, and to submit questions beforehand, people should go to: [www.wiltshire.gov.uk/local-plan](http://www.wiltshire.gov.uk/local-plan).

The in-person sessions begin with a drop-in event at Amesbury Library on Monday 2 October, followed by events at Bradford on Avon Library on Monday 2 October, Chippenham Olympiad on Tuesday 3 October, and Melksham Community Campus on Wednesday 4 October. All events take place from 3pm to 7pm, apart from the Westbury event, which takes place between 4.30pm and 8.30pm. People can just turn up at these events - there is no need to book. If people cannot make their local in-person event, they are welcome to attend any of the others to discuss the Plan and their own area - all events are open to all.

Cllr Nick Botterill, Cabinet Member for Strategic Planning, said: "The Local Plan is very important as it sets out the vision and framework for housing, infrastructure and land for employment growth in Wiltshire for the next 15 years."

"As we approach the end of the Local Plan process, it's very important that we get residents impressions, feedback and comments and so we're holding 16 in-person events and an online event over the coming weeks."

"These informal in person drop-in events are a chance to discuss the Plan with our planning officers and ask questions, and also find out how to comment on the Plan."

"This Local Plan proposes to only build the homes we need during the Plan period up until 2038, with 36,740 homes to be built in Wiltshire, of which over 21,900 homes have already been built or are committed."

"It also sets out ambitious sustainability policies, as new developments will have to meet zero carbon standards, improve biodiversity and also have cycling and walking connections."

The full schedule of events is as follows. People can read all of the Local Plan documents on the council's website and at the main council offices at County Hall, Trowbridge, Monkton Park, Chippenham, and Bourne Hill, Salisbury. The Plan will also be available in many Wiltshire Council libraries.

People can share their views through the council's online portal, and anyone without internet access can visit a library to use the computers there, or contact the council to get a written copy of the representation form and find out how to view the documents. To find out more and to sign up for online event, people should go to [www.wiltshire.gov.uk/local-plan](http://www.wiltshire.gov.uk/local-plan).

A full list of drop-in sessions is available at [www.wiltshire.gov.uk/local-plan](http://www.wiltshire.gov.uk/local-plan).

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# Wiltshire Council LOCAL PLAN CONSULTATION

## What is the Wiltshire Local Plan?

The Wiltshire Local Plan sets out the vision and framework for housing, infrastructure, and land for employment growth in Wiltshire for the next 15 years, until 2038. It is Wiltshire's most important planning document, used to guide decisions on future development. The Local Plan will replace the current Wiltshire Core Strategy.

The Local Plan will ensure that development takes place in the right places and that communities benefit from a sustainable balance of jobs, services, facilities, and homes.

It will make significant strides towards meeting the challenges of climate change through positive

interventions that will help Wiltshire's communities tackle and adapt to threats posed by climate change.

It sets planning policies that will enhance our environment through a comprehensive range of measures that include biodiversity net gain, nature recovery programmes, access to quality open spaces and responsible management of natural resources.

Once adopted, the Local Plan will become part of Wiltshire's Development Plan. All planning applications in Wiltshire will be determined in accordance with the Development Plan, making the Local Plan an important place-shaping document for Wiltshire over the next 15 years.

## How has the Local Plan been prepared?

The current development plan for Wiltshire includes the Wiltshire Core Strategy 2006 to 2026, which was adopted in 2015. The Wiltshire Local Plan is a review of the current Wiltshire Core Strategy, building on existing objectives and spatial strategy to address Wiltshire's needs for new homes, jobs and infrastructure over the period 2020 to 2038.

In preparing the draft Plan, existing Wiltshire Core Strategy policies and those retained from the former district councils have been reviewed and either deleted or incorporated into the draft Plan.

The draft Plan 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.

We have also worked closely with neighbouring planning authorities such as Swindon Borough Council, Bath and North East Somerset Council, Test Valley Borough Council, and Dorset Council.

## Spatial Strategy of the Local Plan

Wiltshire is divided into four 'Housing Market Areas' (HMAs) which are based on geographical patterns of demand for housing. These areas are based around the settlements of Chippenham, Salisbury, Trowbridge and parts of Wiltshire that are influenced by the nearby settlement of Swindon. For each HMA the Local Plan sets out an area strategy

which defines the scale of growth for housing and employment that is to be delivered within each HMA over the lifetime of the Local Plan up until 2038.

The Local Plan seeks to provide 36,740 homes (of which over 21,900 homes have already been built or are committed).



Wiltshire Council

## How will housing and employment land be distributed?

**Table 4.1 Scales of housing and employment needs**

Area	Estimated Housing Need (2020-2038) (dwellings)	Forecast Employment Land Demand (2020-2038) (Hectares)
Chippenham	13,625	50.5
Salisbury	11,015	32.1
Swindon	3,455	18.1
Trowbridge	8,640	19.3

### Chippenham

**Table 4.2 Distribution of housing growth for the Chippenham area**

Settlement	Housing growth (2020-2038) (dwellings)	Completions and commitments (1 April 2020 - 31 March 2022)*	Residual at 1 April 2022**
Chippenham	5,850	3,759	2,090
Calne	1,230	635	600
Corsham	360	105	260
Devizes	980	936	40
Malmesbury	600	611	0
Melksham	2,160	1,036	1,120
Rural Area	2,460	1,732	730

**Table 4.3 Distribution of employment growth for the Chippenham area**

Settlement	Employment Land Supply (ha)
Chippenham	42.5
Calne	5.1
Corsham	-
Devizes	9.9
Malmesbury	3.3
Melksham	5.5
Rural Area	-

### Swindon

**Table 4.10 Distribution of housing growth for the Swindon area**

Settlement	Housing growth (2020-2038) (dwellings)	Completions and commitments (1 April 2020 - 31 March 2022)*	Residual at 1 April 2022**
Marlborough	600	368	230
Royal Wootton Bassett	1,340	113	1,230
Rural Area	1,510	805	710

**Table 4.11 Distribution of employment growth for the Swindon area**

Settlement	Employment Land Supply (ha)
Marlborough	1.8
Royal Wootton Bassett	6.9
Rural Area	-

\*Includes major permissions post 1 April 2022, up to 31 May 2023

\*\*Residual rounded to the nearest ten dwellings

The Local Plan explains how the overall HMA requirements should be apportioned to the main settlements and rural areas within each of the four HMAs:

### Salisbury

**Table 4.6 Distribution of housing growth for the Salisbury area**

Settlement	Housing growth (2020-2038) (dwellings)	Completions and commitments (1 April 2020 - 31 March 2022)*	Residual at 1 April 2022**
Salisbury	4,500	2,964	1,530
Amesbury	530	409	120
Tidworth and Ludgershall	2,080	814	1,270
New Community (Area of Search)	(1,500 - 2,000)	0	(1,500 - 2,000)
Rural area	2,300	938	1,360

**Table 4.7 Distribution of employment growth for the Salisbury area**

Settlement	Employment Land Supply (ha)
Salisbury	12.3
Amesbury	-
Tidworth and Ludgershall	10.7
New Community (Area of Search)	(5.0)
Rural area	2.0

### Trowbridge

**Table 4.14 Distribution of housing growth for the Trowbridge area**

Settlement	Housing growth (2020-2038) (dwellings)	Completions and commitments (1 April 2020 - 31 March 2022)*	Residual at 1 April 2022**
Trowbridge	4,420	3,581	840
Bradford on Avon	140	59	80
Warminster	1,780	1,738	40
Westbury	1,400	833	570
Rural Area	910	532	380

**Table 4.15 Distribution of employment growth for the Trowbridge area**

Settlement	Employment Land Supply (ha)
Trowbridge	27.4
Bradford on Avon	-
Warminster	5.6
Westbury	16.7
Rural Area	-

## How will the plan support our infrastructure needs?

The impact of development on local communities and the fabric of the existing built and natural environment is an important consideration. Managing this impact involves protecting existing infrastructure and securing the timely investment of new infrastructure. This includes roads, green spaces, utilities, schools, and healthcare provision.

The Council will continue to work in partnership with a range of internal and external infrastructure providers and, where appropriate, neighbouring authorities to ensure that new or improved infrastructure is delivered prior to, or in conjunction with, new development.

## Strategic Objectives

The Council has identified six strategic, long term and interlinked challenges in Wiltshire that apply across the whole county, which will be addressed through the policies of the Local Plan. The challenges cover the following issues:

- Economic Development
- Infrastructure
- Providing New Homes
- Planning for Strong and Healthy Communities
- Climate Change
- Environmental Quality

## Settlement Strategy

The Settlement Strategy identifies the different tiers of settlements based on their role and function, and how they relate to their wider hinterland. This sets the basis for how sustainable development is defined and applied within Wiltshire. The primary focus for new development will be directed to the larger, more sustainable settlements – Principal Settlements and Market Towns.

**Principal Settlements** are strategically important centres and the primary focus for development. This will safeguard and enhance their strategic roles as employment and service centres. The Principal Settlements are Chippenham, Trowbridge, and Salisbury.

**Market Towns** are defined as settlements that have the ability to support sustainable patterns of living in Wiltshire through their current levels of facilities, services, and employment opportunities. The Market Towns are Amesbury, Bradford on Avon, Calne, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Tidworth and Ludgershall, Warminster, Westbury, and Royal Wootton Bassett.

**Local Service Centres** are defined as smaller towns and larger villages which serve a surrounding rural hinterland and possess a level of facilities and services that, together with improved local

employment, provide the best opportunities outside the Market Towns for greater self-containment. The Local Service Centres are Pewsey, Market Lavington, Cricklade, Tisbury, Mere, Downton and Wilton.

**Large Villages** are defined as settlements with a limited range of employment, services, and facilities. Development at Large Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services, and facilities.

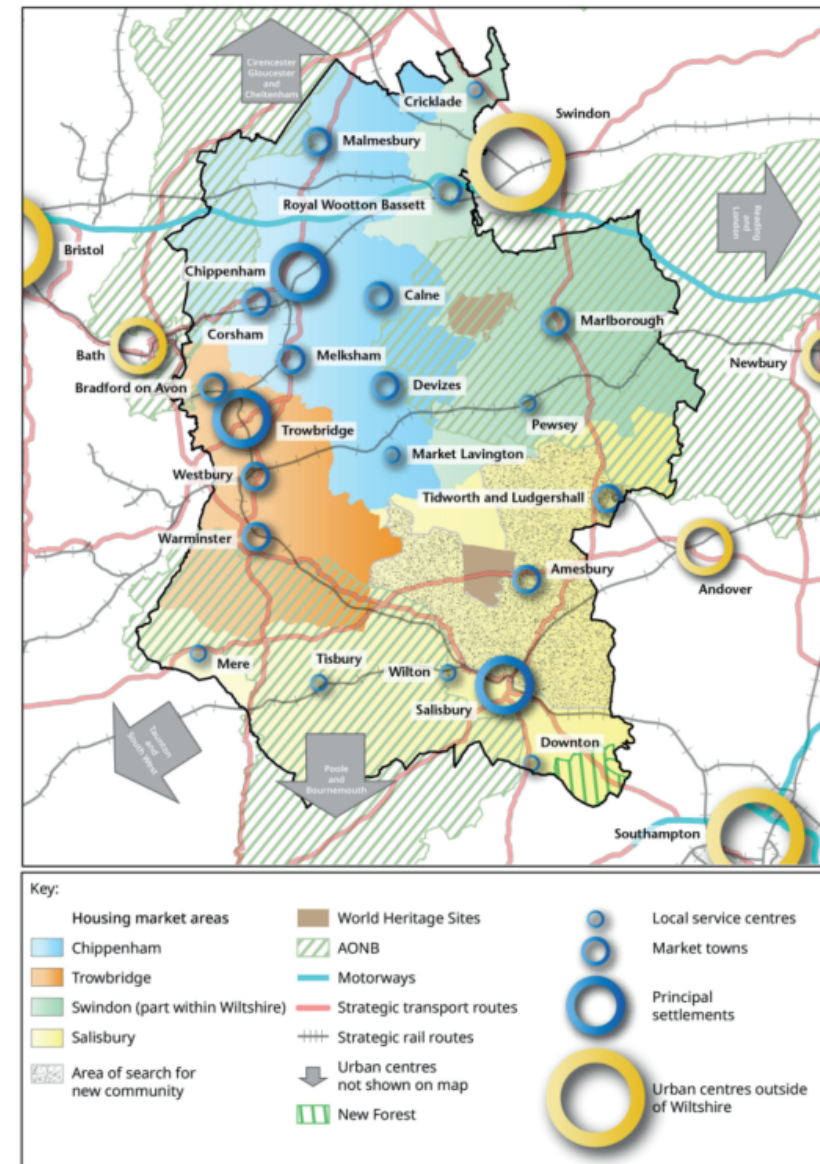
**Small Villages** have a low level of services and facilities, and few employment opportunities. Development at Small Villages will be limited to respond to local needs and to contribute to their vitality.

'Settlement boundaries' generally delineate the extent of urban areas typically reflecting what has been built and are shown on the Policies Map. They define the built edges of Principal Settlements, Market Towns, Local Service Centres and Large Villages and are a policy tool for managing how development should take place, with development within boundaries being generally supported.'

Any land not defined in the hierarchy above is classified as open countryside.



**Figure 3.1 Key Diagram** (Map of the county – Housing Market Areas where the Principal Settlements, Market Towns and Local Service Centres are located.)





## Area Strategies

Area Strategies set scales of growth at settlements, allocate land for development, and show where and how needs will be addressed for the following:



housing (including affordable housing), employment, retail, leisure, and other commercial development.



infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and the provision of energy (including heat);



community facilities (such as health, education, and cultural infrastructure); and conservation and enhancement of the natural, built, and historic environment, including landscapes and green and blue infrastructure, and



planning measures to address climate change mitigation and adaptation.

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.

A lower level of growth is expected to be delivered within the smaller more rural settlements. Housing requirements for the Local Service Centres and Large Villages are set out within the Local Plan, with the intention that this will be delivered through locally prepared neighbourhood plans wherever possible.

## Delivering the Spatial Objectives

The Local Plan will update and introduce new policies that will be used to guide the determination of future planning applications. The council have removed and revised policies that were in the Wiltshire Core Strategy and have either deleted or incorporated more than 170 policies from the county's legacy district councils.

Several new policies have also been added, related to issues such as homes standards, housing types, health and wellbeing, climate change, biodiversity, and nature recovery.



### Economic policies

The Council has updated and added new policies into the Local Plan, covering areas such as new and existing employment land, military establishments, town centres, tourism, and transport.



### Social policies

The Council has updated and added several new policies into the Plan, covering areas such as affordable homes, housing types, community facilities, housing in the countryside and open space and play facilities.



### Environmental policies

The Council has updated and added several new policies into the Plan covering areas such as sustainable construction, renewable energy, climate change, biodiversity, landscape, green and blue infrastructure, canals, flood risk, air quality, contaminated land, design, historic environment, and World Heritage Sites.



## How do I respond?

The Council has published the Local Plan so that you can make comments on it before it is submitted for examination by a government appointed Planning Inspector.

Comments can be submitted online via the Council's consultation portal accessible via this link: [www.wiltshire.gov.uk/local-plan](http://www.wiltshire.gov.uk/local-plan).

The purpose of the examination, forming the basis of the questions asked within this consultation, is to examine whether the plan meets the test of soundness defined in the National Planning Policy Framework (NPPF) and in particular whether the plan is positively prepared, justified, effective and consistent with national policy and meets all the relevant legislative requirements, including the duty to cooperate.

Please consider the following questions :

- **Is the Plan positively prepared?**

Does it provide a strategy that seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities and is consistent with achieving sustainable development?

- **Is the Plan justified?**

Does it have an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence?

- **Is the Plan effective?**

Is it deliverable over the plan period and based on effective joint working on cross-boundary strategic matters, as evidenced by the statement of common ground?

- **Is the Plan consistent with national policy?**

Does it enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework (NPPF)?

If you think the content of the plan is not sound because it does not include a policy on a particular issue, please consider the following questions before making your comments:

- Is the issue already covered specifically by national planning policy?
- Is the issue already covered by another policy in this plan?
- If the policy is not covered elsewhere, in what way is the plan unsound without the policy?
- If the plan is unsound without the policy, what should the policy say?

The period for submitting representations relating to the draft Plan begins **9am Wednesday 27 September 2023** and lasts for 8 weeks, closing at **5pm on Wednesday 22 November 2023**. Representations received beyond this date may not be considered.

To make your representation, and to read all Local Plan documents, please go to

[www.wiltshire.gov.uk/local-plan](http://www.wiltshire.gov.uk/local-plan)



Scan me!



Please note we cannot accept anonymous representations, as we must ensure that the names of people who make a representation can be made available and be taken into account by the Planning Inspector at the Examination.

Anyone without internet access can visit their local library to view documents and obtain paper copies of the response form.

If you would like more information or would like to request copies of the documents, please contact Spatial Planning via email ([spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk)), phone (**01225 713223**) or post to Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN. Please note that there will be a fee for providing any documents requested.

## Next Steps

Following the end of the consultation period, the council will summarise the main issues raised and submit the Plan, accompanying evidence and all submitted representations to the Secretary of State, who will appoint an Inspector to undertake an independent examination. This submission is anticipated to take place in quarter two 2024 with the examination and hearings anticipated to take place following this.



Wiltshire Council

## Schedule 2: Summary of the key issues raised by the Regulation 20 representations

- 5.18** Schedule 2 provides a series of tables that outline the key issues raised pursuant to Regulation 19/20 and the comments received. These are presented in plan order.
- 5.19** Please note, the tables that follow are not intended to provide a verbatim list of all issues raised from each and every representation, rather they present a judgement of key issues that have arisen following analysis of all comments received to provide an illustration of the key issues raised against each part of the plan. They are also intended to provide an indication of who has contributed to any key issue(s). Please note, when referring to the number of individuals (e.g., community members not belonging to an organisation) the number specified is approximate and rounded to the nearest 10 if under 100 and nearest 100 if over 100.
- 5.20** Each table will be presented in the format as illustrated in the template table below.

Table 5.4 [Insert policy number / part of plan being referred to] key issues

Key issues raised (Insert policy xx / local plan part)	Respondent(s)
<b>(Sub headings used to group key issues of a similar theme)</b>	
<b>Insert summary heading of key issue to introduce it [insert plan reference if applicable]:</b> Insert key issue wording summarising what representations said contributing to this key issue.	Inserted here are a list of respondents that contributed to this key issue. This is presented by referring to an organisation or, where no organisation is applicable, the number of individuals contributing to this key issue (e.g., Natural England; Bloor Homes; 10 individuals)
<b>Insert summary heading of key issue to introduce it [insert plan reference if applicable]:</b> Insert key issue wording summarising what representations said contributing to this key issue.	Inserted here are a list of respondents that contributed to this key issue. This is presented by referring to an organisation or, where no organisation is applicable, the number of individuals contributing to this key issue (e.g., Natural England; Bloor Homes; 60 individuals)
<b>Insert summary heading of key issue to introduce it [insert plan reference if applicable]:</b> Insert key issue wording summarising what representations said contributing to this key issue.	Inserted here are a list of respondents that contributed to this key issue. This is presented by referring to an organisation or, where no organisation is applicable, the number of individuals contributing to this key issue (e.g., Natural England; Bloor Homes; 100 individuals)
<b>(Sub headings used to group key issues of a similar theme)</b>	
<b>Insert summary heading of key issue to introduce it [insert plan reference if applicable]:</b> Insert key issue wording summarising what representations said contributing to this key issue.	Inserted here are a list of respondents that contributed to this key issue. This is presented by referring to an organisation or, where no organisation is applicable, the number of individuals contributing to this key issue (e.g., Natural England; Bloor Homes; 300 individuals)

## Local Plan section 1: Introduction and spatial portrait

**5.21** Please see below the key issues tables listing the key issues raised for the parts of the plan within section 1: Introduction and spatial portrait, namely:

- What is this Plan?
- How to use this Plan?
- How has the Plan been prepared?
- A spatial portrait of Wiltshire

Table 5.5 [What is this Plan?] key issues

Key issues raised (What is this Plan?)	Respondent(s)
<b>Evidence Base</b>	
<p><b>Evidence Base:</b> The Wiltshire Local Plan is not based on an up-to-date evidence base. There is no up to date evidence to support the housing needs forecasts; Wiltshire Council have taken discretionary Government housing allocations as centralised targets outside of the control of Wiltshire Council, which should have been refused and accepted on a lower basis to meet the needs of Wiltshire.</p>	Individuals x10.
<b>Neighbourhood Planning</b>	
<p><b>Neighbourhood Planning:</b> it is believed that the local plan should set out a clear timetable for the preparation and adoption of Neighbourhood Plans with confirmed site allocations responding to the identified housing need.</p> <p>The Plan states at paragraph 1.6 <i>'All the policies in this plan are strategic.'</i> Whilst the NPPF, at paragraph 30 implies local plans should contain non-strategic policies covering neighbourhood areas. It is believed that as all Wiltshire Local Plan policies are strategic the Plan lends little or no weight to the non-strategic policies of Neighbourhood plans. A non-strategic means for communities to assess their local housing needs in accordance within the LHNA is required. The plan has not been positively prepared, lack of reference to a working framework for local people to assess their housing needs at a local scale.</p>	Gaiger Bros; Seend Parish Council.
<b>Viability Assessment</b>	
<p><b>Viability Assessment:</b> There are significant concerns about the adequacy of key assumptions that appear to underpin the viability assessment and therefore the ability for development to meet all the relevant policy requirements and deliver expected infrastructure provision. The assessment should consider a broader range of smaller development sites and not treat a c6 unit scheme the same as a c49 unit scheme. Given this coarseness of assessment, it is unclear whether the resulting viability appraisal outcomes are in any way representative of a typical smaller development.</p>	Gaiger Bros.
<b>Consultation Process</b>	
<p><b>Consultation Process:</b> The Local Plan does not take into account the views of local people and local environmental issues. To read and digest the Draft plan and all its supporting documents runs into some hundreds if not thousands of pages and is not an easy task for the average person to undertake. Not everyone will have a computer or the time to spend in a library ploughing through these papers to try and find the passages that applies to them or their community. Clear references and indexing to make such tasks easier for the layman</p>	Individuals x20.

Key issues raised (What is this Plan?)	Respondent(s)
<p>is therefore essential. The Local Plan's website and portal are criticised for being user-unfriendly, inaccessible, complex, and intimidating for residents. This design flaw limits residents' ability to access, understand, and make representations.</p>	
<p><b>Lack of transparency:</b> Despite the Harnham Housing Steering Group raising over 35 FOIs, Wiltshire Council has only provided satisfactory responses to 3. For the remaining FOIs, the council cited the 'draft status' as a reason for non-disclosure, raising concerns as the documents have already been issued. Obtaining detailed evidence from Wiltshire Council has been impossible, showcasing a lack of transparency in applying FOI legislation and potentially conflicting with the principles of "Open Government," undermining our democratic right to raise objections, indicating a failure by Wiltshire Council to facilitate proper consultation with residents of Harnham and Wiltshire.</p>	Individuals x20.
<p><b>Meeting the needs of existing communities/local infrastructure</b></p>	
<p><b>Meeting the needs of existing communities/local infrastructure:</b> The plan <i>ensures</i> housing needs, while only <i>proposing</i> that essential and place-shaping infrastructure is contributed to by potential developers. The plan must also <i>ensure</i> essential infrastructure be delivered for the existing communities BEFORE new development takes place and <i>ensure</i> that continued essential infrastructure will be delivered with new developments. This will deliver a sustainable pattern of growth. At present the housing delivery timetable is backloaded towards the end of the plan period. Given the pressing affordability issues faced by businesses and employees now, it would make sense if more priority was given to delivering more of the housing requirement at an earlier stage in the plan.</p>	Lydiard Tregoze Parish Council; Business West.
<p><b>Relationship to adopted plans</b></p>	
<p><b>Relationship to adopted plans:</b> Although the PPG gives some flexibility in respect of Plan making for an area, it is not clear in the Reg 19 Plan the relationship to the Adopted Wiltshire Site Allocations DPD (which includes policies for the South Wiltshire Housing Market area)</p> <p>Local Plan Appendix 1 only refers to the existing policies from the Wiltshire Core Strategy and saved policies from the former District Local Plans. It is only in the supporting evidence i.e., "Planning for Salisbury" in Appendix 1 that reference is made to policies in the Wiltshire Site Allocations Plan whether they are retained, replaced or deleted. Paragraph 1.4 of the Reg 19 Plan should clarify the relationship to adopted Plans and cross reference to Appendix 1 which should include the Wiltshire Site Allocations DPD and explain which policies are retained, replaced or deleted. Paragraph 1.4 should be amended to state that the <i>'Chippenham Site Allocations Plan and Wiltshire Housing Site Allocations Plan will remain part of the Development Plan'</i>.</p>	Redrow Homes; Crest Nicholson South West.
<p><b>Malmesbury</b></p>	

Key issues raised (What is this Plan?)	Respondent(s)
<p><b>Malmesbury:</b> The Reserve Sites Policy should be withdrawn. In the alternative it should not be exclusively applied in areas that have either already delivered or have or reasonably will have plans to deliver required housing. It should also be automatically disapplied in areas that have already achieved housing numbers.</p>	Malmesbury Civic Trust.
<p><b>Salisbury</b></p>	
<p><b>Salisbury:</b> The whole plan is not consistent with achieving sustainable development. To do this it would need to help to build a strong economy, but this plan would be actively harming Salisbury’s famously beautiful setting, its heritage and views of the spire – our essential tourism industry. Support is given for a more inspirational concept such as the 'Area of Search for a New Community Settlement' as the focus of the Plan to meet sustainable housing requirements in the Salisbury Area. This would be developed with a full range of infrastructure to meet its needs which Salisbury does not have. Prioritise and incentivise viable brownfield development in Salisbury, including at Churchfields, instead of developing green fields. The severe constraints of an historic city such as Salisbury with its inadequate road infrastructure and unique setting have not been recognised nor addressed in this plan. There is no analysis of why employers have left Salisbury and employment land there has proved unattractive and developed for housing eg Netherhampton Road. Access to Churchfields industrial estate is the ‘elephant in the room’ which is not addressed in this plan. The plan does not seek to make best use of existing resources and infrastructure but persists with a policy that leads to an increase in car use on poor quality roads, large ‘anywhere’ housing estates lacking facilities, poorly linked to the towns and alien to the landscape (St Peter’s Place in Salisbury is an example of this).</p>	Individual x20.
<p><b>Trowbridge</b></p>	
<p><b>Trowbridge:</b> A failure to re-visit the strategic objectives (1.2) has led the Council into the publication of an unsound plan in respect of Trowbridge and particularly policies 52 and 53.</p>	Individual x10.
<p><b>Chippenham</b></p>	
<p><b>Chippenham:</b> The Local Plan over estimates the number of homes required in Wiltshire and the Chippenham HMA. Homes that are built must meet the demand for affordable homes; not prioritise the commercial preferences of developers.</p> <p>The Local Plan over estimates the likely growth in employment in the Chippenham area; this is evidenced by the number of existing unused units. The Local Plan is insufficiently ambitious in the number of homes that could be delivered on brownfield sites (including in Chippenham), thereby "requiring" more on greenfield. This is incompatible with delivering carbon neutral by 2030 as per Wiltshire Council policy. The ongoing failure by Wiltshire Council to involve Chippenham residents in a positive and meaningful way about the town (for example</p>	Chair: Liberal Democrats.



Key issues raised (What is this Plan?)	Respondent(s)
<p>during the "Future Chippenham" / HIF bid) has been deplorable. While some presentations on the Local Plan have been provided, no meaningful listening has taken place; and local councillors have been excluded from the development of the undemocratic "Chippenham One Plan".</p>	
<p><b>Review process of the Local Plan</b></p>	
<p><b>Review process of the Local Plan:</b> Para 33 of the NPPF states that <i>“policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary”</i>. That five-year deadline passed in January 2020. It is very late in the Core Strategy plan period to be undertaking a review and significantly past the point when a review should have been undertaken. Whilst Appendix A presents a series of tables setting out how policies have been revised, there is no real analysis within the Plan or its evidence documents as to the effectiveness of the adopted Core Strategy. Such a review might ruminate on the fact that the Council has been unable to demonstrate a five-year supply of housing since April 2019. The objectives should reflect an up-to-date assessment of needs and opportunities in the area. The objectives should also be reviewed to ensure they are consistent with government guidance.</p> <p>The principal policies within the Plan are not consistent and the strategy pertaining to each is therefore unsound. The retention of the Core Strategy Strategic Objectives has implications for how the LPA is approaching the LPR and in particular the balancing of the employment and housing strategies that are contained within. To be justified the Plan must be internally consistent in defining development objectives and ensuring that strategies are aligned in pursuit of sustainable development objectives.</p>	<p>Richborough Estates; Wiltshire Climate Alliance; Redrow Homes; Gleeson Land.</p>
<p><b>Review process of the Local Plan:</b> The current Wiltshire Core Strategy (adopted 2015) had a 'Section 7 Monitoring and Review' which made reference to the Wiltshire Monitoring Framework and the Annual Monitoring Report. This section on Monitoring has now been relegated to the Sustainability Appraisal report. Under Section 35 of the Planning and Compulsory Purchase Act 2004, as amended by the Localism Act 2011, local authorities must prepare reports on the extent to which policies set out in the local development documents are being achieved. These reports need to be made available to the general public. In view of the importance attached to Monitoring and Review this section could usefully be moved into the main Local Plan.</p>	<p>Cycling Opportunities Group Salisbury.</p>
<p><b>Plan period</b></p>	
<p><b>Plan Extension:</b> The plan period covers 2020 to 2038. Taking account of the time it will take to review representations and modify the plan in response to the points raised and taking account of the time needed for the Examination in Public, the Local Plan is unlikely to be adopted until 2025. Even if adoption by the end of</p>	<p>Kier Group Limited; Classmaxi Limited and Lincoln College Oxford; Richborough Estates; Barwood Land; Business West.</p>

Key issues raised (What is this Plan?)	Respondent(s)
<p>2024 is achieved, this would effectively still only provide 14 years between adoption and the expiration of the plan. The plan should therefore extend until at least 2040 which adds an additional 2 years of housing and employment growth which as a minimum would require another 4,082 additional houses.</p>	

Table 5.6 [How to use this Plan] key issues

Key issues raised (How to use this Plan)	Respondent(s)
<b>How to Use this Plan</b>	
<b>Strategic and non strategic policies</b>	
<b>The Local Plan review does not define strategic and non-strategic policies:</b> It is not accepted that all policies in the draft Local Plan are strategic and therefore is not in accordance with the NPPF.	Redrow Homes; Individuals x10.
<b>Consultation</b>	
<b>Failure to comply with Statement of Community Involvement:</b> The Local Plan is not legally compliant because Wiltshire Council has failed to comply with its own Statement of Community Involvement by not engaging, as part of the Regulation 18 consultation in 2021 and subsequently, with residents for those impacted by proposed development E.g., at Harnham and Salisbury.	Individuals x10.
<b>Evidence</b>	
<b>Refer to all evidence:</b> Where a proposed approach relies on evidence that is not included within the plan then it would be helpful if all of the relevant evidence documents could be referred to with links as footnotes.	Individuals x10.
<b>Rural Housing Requirement Figure</b>	
<b>The housing allocation for Seend conflicts with the Neighbourhood Plan:</b> This is a change that has not been made in consultation with the Parish. The proposed housing requirement bears no relation to Seend's actual housing needs.	Seend Parish Council.
<b>Infrastructure</b>	
<b>The plan focuses on housing and fails to take account of infrastructure requirements:</b> Excludes employment, retail, leisure, transport infrastructure and health, education and cultural facilities. Without positive improvements to the road and public transport networks this plan will exacerbate the existing challenges.	Individuals x10.
<b>Transport</b>	
<p><b>Several issues have been ignored:</b></p> <ul style="list-style-type: none"> <li>• Cross boundary sustainable transport issues between Wiltshire, Bath and Frome which will arise as a result of increased housing growth have been ignored.</li> </ul>	Transport for New Homes.

Key issues raised (How to use this Plan)	Respondent(s)
<ul style="list-style-type: none"> <li>River crossings are a major bottleneck for transport modes in and around Wiltshire, including journeys to Bath via Bradford on Avon. This is missing from the discussion in the Local Plan.</li> <li>House prices across the sub-region have not been taken into account and not been discussed, but are surely responsible for many of the transport patterns sub-regionally and within Wiltshire.</li> </ul>	
<b>MOD Housing</b>	
<p><b>Larkhill MOD establishment has been ignored:</b> There is no reference to Larkhill, a large MoD establishment with private housing and a recent army rebasing house build of over 200 properties which is all part of Durrington Parish and share Durrington facilities such as shops, schools, roads and recreational facilities.</p>	Durrington PC.

Table 5.7 [How has the Plan been prepared?] key issues

Key issues raised (How has the Plan been prepared?)	Respondent(s)
<b>Consultation process</b>	
<b>Consultation process:</b> The process for commenting through the consultation was too complex; poorly set out; too much complicated information; concern that the process excluded some people from commenting due to a lack of inclusivity.	Bradford on Avon Parish Council; Steeple Ashton Parish Council; Woodborough Parish Council; Harnham Housing Steering Group; Individual x40.
<b>Lack of consultation on allocated sites at the Regulation 18 stage:</b> Concern that there was a lack of consultation on specific site allocations at the Regulation 18 stage (Harnham sites in Salisbury and the Barton Dene site in Marlborough specifically noted); the council have not adhered to the Statement of Community Involvement in this regard.	Harnham Housing Steering Group; Preshute Parish Council; Great Tew Bantham Estates LLP; Individual x110.
<b>Contact with locally affected residents:</b> Concern that letters alleged to be informing residents about the proposed Harnham sites were not received.	Harnham Housing Steering Group; Individual x30.
<b>Local searches:</b> Concern that the council failed to identify the Harnham sites in Local Searches.	Harnham Housing Steering Group
<b>Freedom of Information requests relating to the Harnham, Salisbury sites:</b> Evidence and comprehensive responses requested through FOI concerning Harnham sites have not been forthcoming.	Harnham Housing Steering Group; Individual x20.
<b>Elapsed time between consultations:</b> The length of time between the Regulation 18 and Regulation 19 consultations means that the strategic context is very different in terms of national policy context, housing numbers, employment, and apportionment to each towns. Concern that progressing to the Regulation 19 stage means there is no opportunity for the council to consider responses and make changes if required prior to submission.	Great Tew Bantham Estates LLP.
<b>Consultation with neighbourhood plan qualifying bodies:</b> Insufficient consultation with parish councils in regard to overlap between the Local Plan and neighbourhood plans.	Individual x10.
<b>Consultation with Salisbury City Council:</b> Concern that there has been insufficient consultation with Salisbury City Council with regard to proposals, site allocations and brownfield/windfall site availability at Salisbury.	Harnham Housing Steering Group; Individual x20.
<b>Duty to Cooperate (DtC) / Statements of Common Ground (SoCGs)</b>	
<b>Lack of Statements of Common Ground:</b> The council have not produced, maintained or updated Statements of Common Ground with all of the Prescribed Bodies or Neighbouring Authorities, conflicting with NPPF and PPG requirements; inadequate up to date engagement demonstrated under the DtC between the Regulation	Catesby Estates; Barratt David Wilson; Great Tew Bantham Estates LLP; Wain Estates Ltd.; Hollins Strategic Land; Taylor Wimpey Strategic

Key issues raised (How has the Plan been prepared?)	Respondent(s)
18 and Regulation 19 versions of the Local Plan; Concern that the absence of SoCGs at this stage raises questions over how new agreements will be reflected in the Local Plan, and how interested parties may then comment on the SoCGs or any necessary changes to the Local Plan; A lack of SoCGs with neighbouring authorities raises concern that there may be unmet needs that have not been addressed.	Land; Richborough; Thames Valley Chamber of Commerce Group/Swindon Chamber of Commerce; Harnham Housing Steering Group.
<b>Insufficient duty to cooperate position and lack of Statement of Common Ground with Swindon:</b> The most recent Duty to Cooperate consultation with Swindon was March 2021, with circumstances having now changed which need to be responded to; Any increased scale of residual housing needs in Swindon, that cannot be met within that authority area, should be addressed through Wiltshire's Local Plan; SoCG with Swindon is required.	Thames Valley Chamber of Commerce Group/Swindon Chamber of Commerce; Barratt David Wilson; Wain Estates Ltd.; Hollins Strategic Land; Gladman; Taylor Wimpey Strategic Land.
<b>Swindon/Wiltshire Employment needs:</b> The Local Plan evidence fails to address cross boundary employment needs with Swindon; both Wiltshire and Swindon's approaches lack the long-term vision, strategy and guidance needed to secure investment in strategic infrastructure that Swindon needs to maintain its competitive role in the local economy.	GLP; Thames Valley Chamber of Commerce Group/Swindon Chamber of Commerce.
<b>Swindon should be recognised in the settlement hierarchy:</b> The Local Housing Needs Assessment Update does not address the fact that part of the Swindon urban area is in Wiltshire, and fails to address cross-boundary co-operation, the DtC, or SoCGs / Swindon should be considered in the settlement hierarchy and development strategy; A Joint Strategy for meeting needs in Swindon should be form part of the strategic planning of the two authorities.	Taylor Wimpey Strategic Land; Thames Valley Chamber of Commerce Group/Swindon Chamber of Commerce; Barratt David Wilson.
<b>Plan period to address strategic cross boundary issues with Swindon:</b> A longer term plan period (to 2050) should apply to provide an adequate timeframe for delivering cross boundary long term economic/spatial development strategy and infrastructure planning around Swindon's growth needs.	Thames Valley Chamber of Commerce Group/Swindon Chamber of Commerce.
<b>Insufficient duty to cooperate position and lack of Statement of Common Ground with areas in the wider region:</b> There are shortfalls in the wider region (at Bristol City and North Somerset) which should be considered as factors supporting a higher housing requirement, given constraints at BANES and South Gloucestershire.	Robert Hitchens Ltd.; Great Tew Bantham Estates LLP; Wain Estates Ltd.; Hollins Strategic Land.
<b>Lack of consultation with Natural England:</b> Concern that the council have failed in their Duty to Cooperate by not consulting with Natural England re. Harnham sites in Salisbury.	Individual x20.
<b>Lack of consultation with Historic England:</b> Concern that the council have failed in their Duty to Cooperate by not consulting with Historic England re. Harnham sites in Salisbury.	Individuals x10.
<b>Lack of consultation with Area of Outstanding Natural Beauty:</b> Concern that the council have failed in their Duty to Cooperate by not consulting with the AONB board re. Barton Dene, Marlborough.	Preshute Parish Council; Individuals x10.

Key issues raised (How has the Plan been prepared?)	Respondent(s)
<b>Lack of consultation on cross boundary strategic transport matters:</b> The New Community Area of Search (Policy 21) should, in line with the 'Decarbonising Transport' statement be based around a railway station (likely new or re-opened). Strategic transport links will require cross-boundary working (e.g. with Hampshire), which has not been addressed in the Duty to Co-operate report.	Cycling Opportunities Group Salisbury (COGS)
<b>Lack of consultation with National Highways:</b> Concern that there is a lack of evidence of dialogue between Wiltshire Council and National Highways regarding the potential impacts of housing development in Alderbury on the over-loaded A36.	Alderbury Parish Council
<b>Duty to Cooperate - Somerset Council</b>	
<b>Statement of Common Ground:</b> Somerset Council expect broad areas of engagement for the purpose of SOCG will include development plans, strategic transport, and minerals/waste.	Somerset Council
<b>Highways - A303:</b> Appendix 2 of the DtC report is missing reference to the A303 in the former South Somerset District Council section, as raised in the former Council's response in 2021.	Somerset Council
<b>Highways - A36:</b> National Highways have issued holding objections for development on the periphery of Frome and villages near the A36 until a programme of improvements is in place. Clarification is sought regarding potential impacts on the A36 arising from allocated sites and reserve sites.	Somerset Council
<b>Planning for gypsies and travellers:</b> Somerset Council request to be engaged in the future Gypsy and Traveller DPD.	Somerset Council
<b>Duty to Cooperate - Test Valley Borough Council</b>	
<b>Shared infrastructure and cross boundary matters:</b> Test Valley Borough Council wish to continue working closely with the council and Hampshire CC with regard to Ludgershall, recognising the close interrelationship between Ludgershall and Andover, within the Andover HMA boundary; including in relation to shared infrastructure if Test Valley looks to allocate land at Ludgershall through their Local Plan 2040.	Test Valley Borough Council
<b>Highways infrastructure:</b> With regard necessary highways infrastructure to deliver Policy 40, Test Valley Borough Council request specific reference is made within para 4.198 to working with Test Valley Borough Council and Hampshire County Council.	Test Valley Borough Council
<b>Habitat Regulations:</b> Test Valley Borough Council wish to continue working closely with the council in relation to obligations under the Habitats Regulations, Salisbury Plain SPA and Avon SAC and Solent Region SPA, SAC and Ramsar.	Test Valley Borough Council
<b>Duty to Cooperate - New Forest National Park Authority</b>	

Key issues raised (How has the Plan been prepared?)	Respondent(s)
<b>Cross boundary matters:</b> Cross authority has taken place and will continue in relation to mitigating recreational impacts the New Forest SAC, SPA, and Ramsar, housing needs, water quality and air quality.	New Forest National Park Authority
<b>Duty to Cooperate - Bath and North East Somerset Council</b>	
<b>Cross boundary matters:</b> Engagement has taken place and will continue in regard to transport and travel flows, employment, implications of broad locations of growth; Corsham Station; the Gypsy and Traveller Plan, HRA (including in relation to the Bath/Bradford-on-Avon SAC), green infrastructure and Local Nature Recovery/BANES' declaration of an ecological emergency.	Bath and North East Somerset Council
<b>Duty to Cooperate - Swindon Borough Council</b>	
<b>Cross boundary matters:</b> Engagement has taken place and will continue regarding Local Nature Recovery, North Meadows SAC, minerals and waste.	Swindon Borough Council
<b>Transport evidence:</b> Further work is needed under the duty to cooperate in respect of understanding the fit, relationships and broad outputs between the various transport models between the Councils and National Highways with regard to the strategic transport network in particular; Further work is needed under the duty to cooperate in respect of the extent that further growth can be accommodated on transport networks at strategic locations such as M4 Junction 16; Further work is needed under the duty to cooperate in respect of the need to undertake further joint work particularly on the M4 corridor, Royal Wootton Bassett area and land within the Swindon administrative area with regard to strategic economic growth, logistics and other economic sectors.	Swindon Borough Council
<b>Swindon Local Plan:</b> Further work is needed under the duty to cooperate in respect of a need to update the DtC statement to reflect Swindon's move to a new local plan from a plan review which has been the subject of a number of previous DtC sessions.	Swindon Borough Council
<b>Duty to Cooperate – Cotswold District Council</b>	
<b>Climate change:</b> Support in principle the Local Plan, including the approach to addressing climate change.	Cotswold District Council
<b>Cross boundary matters:</b> Cross boundary issues of key concern for ongoing duty to cooperate are site allocations closes to the CDC border e.g. Malmesbury, employment at former RAF Kemble airfield (Cotswold Airport), the Cotswold Water Park (CWP) area and AONB.	Cotswold District Council
<b>Cotswold Water Park:</b> The approach of deleting the former CWP policy to be replaced by other policies is supported. Ongoing engagement with Natural England is welcomed.	Cotswold District Council



Key issues raised (How has the Plan been prepared?)	Respondent(s)
<p><b>North Meadows Special Area of Conservation:</b> Ongoing partnership working with Wiltshire and Swindon regarding a recreational impacts mitigation strategy for North Meadow Special Area of Conservation (SAC) is supported.</p>	Cotswold District Council
<p><b>Duty to Cooperate - Historic England</b></p>	
<p><b>Previous representations from Historic England:</b> It should demonstrate how the council has taken into account Historic England's previous representations relating to ensuring that the significance of Wiltshire's cultural heritage is sustained and opportunities for its enhancement are fully considered as part of a clear and positive strategy; the need to undertake evaluation to determine how robust and effective the approach is to sustaining and enhancing the historic environment; and the potential need to prepare a Heritage Topic Paper setting out the issues, opportunities, risks and challenges facing Wiltshire's historic environment relating to the Local Plan.</p>	Historic England

Table 5.8 [A Spatial Portrait of Wiltshire] key issues

Key issues raised (A Spatial Portrait of Wiltshire)	Respondent(s)
<b>A Spatial Portrait of Wiltshire</b>	
<b>Natural Environment:</b> Welcome the recognition of the importance of the natural environment, including issues such as water stress and the extent of habitat loss.	Natural England.
<b>Green Belt review:</b> Local Plan paragraph 1.15 states that ' <i>Wiltshire also includes an element of the Western Wiltshire Green Belt, which protects the openness of the countryside between Bath, Bradford-on-Avon and Trowbridge</i> '. This is not wholly accurate. Wiltshire includes the whole of the Western Wiltshire Green Belt (WWGB), which is connected to the Bristol and Bath Green Belt. Wiltshire Council should undertake a comprehensive review of the Green Belt, particularly within 2.5km of Trowbridge railway station.	Trowbridge Town Council.
<b>Wilton:</b> Wilton is a small market town of great historical interest. It should not be labelled as just a Service Centre in the Local Plan Review. It is considered a market town on the Town Council website and was designated a Market Town by Wiltshire Council Local Plan - Looking to the Future, 2021 documentation. Redesignate Wilton as a Market Town in recognition of its ancient royal charters and significance to history of early Wiltshire.	Individuals x10.

## Local Plan section 2: Key challenges, vision and objectives

**5.22** Please see below the key issues table listing the key issues raised for the part of the plan within section 2: Key challenges, vision and objectives, namely:

- A spatial vision for Wiltshire

Table 5.9 [A Spatial Vision for Wiltshire] key issues

Key issues raised (A Spatial Vision for Wiltshire)	Respondent(s)
<b>Spatial Vision</b>	
<b>Plan period:</b> Concerns raised that the Local Plan period will not be adopted in time to meet the 15-year period from adoption as required by the NPPF.	Barratt Homes Bristol; Go South Coast Ltd; Dick Lovett; Rosconn Strategic Land; GLP; Hallam Land Management; Pro Vision; HBF; Acorn Property Group; L&Q Estates; Bellway Homes; Lydiard Tregoze Parish Council; Crest Nicholson South West and Summix Ltd; Redrow Homes; Wain Homes; Waddeton Park; Chippenham Riverside; Land Value Alliances; Acorn Property Group; Redrow Homes.
<b>Housing requirement too low:</b> The housing requirement should be uplifted to reflect an extended plan period.	Go South Coast Ltd; Rosconn Strategic Land; GLP; Wain Homes; Crest Nicholson South West and Summix Ltd; Hallam Land Management; Pro Vision; HBF; Acorn Property Group; L&Q Estates; Bellway Homes; Land Value Alliances; Waddeton Park; Redrow Homes; Chippenham Riverside.
<b>Lack of clarity in the Spatial Vision:</b> The Spatial Vision is too ambiguous and lacks clarity as to how the Local Plan will deliver the vision identified.	European Property Ventures.
<b>Timescales for the Spatial Vision:</b> As the Local Plan proposes to allocate significant urban extensions and unclear future locations for growth it should be framed around a vision that looks further ahead (at least 30 years) to take into account timescales for delivery, as required by the NPPF.	Chippenham Riverside; Home Builders Federation.
<b>Broad locations of growth/new community:</b> Concern that relying on broad locations of growth/new communities delays difficult decisions further down the road – due to the long lead in time needed to deliver new communities, decisions need to be taken sooner rather than later.	Home Builders Federation.
<b>Principal Settlements:</b> Support focus of growth to meet needs in Principal Settlements of Trowbridge, Chippenham and Salisbury and Market Towns	L&Q Estates; Gleeson Land; Peter Zemniak.
<b>Market Towns:</b> The Spatial Vision aspires for Market Towns to become more ‘self-contained’, although it fails to define this and how it will be achieved.	European Property Ventures.

Key issues raised (A Spatial Vision for Wiltshire)	Respondent(s)
<b>Approach to Principal Settlements and Market Towns:</b> The Spatial Vision separates Market Towns from Principal Settlements, but this does not align with paragraph 2.11 bullet point 1. The second paragraph of the Spatial Vision should be modified to reflect Policy 1 and the delivery strategy that directs strategic growth to Market Towns.	Ludgershall Homes.
<b>Cross boundary recognition of the Swindon urban area:</b> The Local Plan and the Spatial Vision fails to recognise the cross-boundary relationship between the northeast of Wiltshire and Swindon; Swindon should be identified as a Principal Settlement; a joint strategy between Wiltshire and Swindon is needed; the plan period to 2038 is an inadequate timescale to address Wiltshire and Swindon's housing and employment needs.	Thames Valley Chamber of Commerce.
<b>Consultation on the Spatial Vision:</b> Concern that there has not been sufficient communication and consultation on the Local Plan and its Spatial Vision.	Individuals x10.
<b>Challenges, objectives and outcomes</b>	
<b>Review of the strategic objectives:</b> Concern that the strategic objectives of the WCS that have been reviewed through the Local Plan are now very old and out of date.	Robert Hitchens Ltd.
<b>Monitoring of the strategic objectives:</b> It is not clear whether the WCS objectives, as reviewed by the Local Plan, have been monitored and whether they have been met.	Robert Hitchens Ltd.
<b>Business Plan:</b> The council's Business Plan is not a relevant evidence based document and the Spatial Vision for the Local Plan should not be aligned to it.	European Property Ventures.
<b>Economic development</b>	
<b>Employment development:</b> The strategy for employment provision must be matched by a suitably robust housing strategy.	Gleeson Land.
<b>Infrastructure</b>	
<b>Health, youth and leisure services:</b> Request the inclusion of health, youth and leisure services in the list of challenges related to infrastructure.	Corsham Town Council.
<b>Infrastructure funding and delivery:</b> Concern that the Local Plan's site allocation proposals lack detailed and costed plans for supporting amenities, which does not meet the opening statement on paragraph 2.6; there is a lack of clarity as to how infrastructure improvements (e.g. sustainable transport) will be delivered.	Individuals x10.
<b>Out-commuting:</b> Aspirational statements about reducing out-commuting and increasing local employment opportunities are not addressed in the content on the Local Plan.	Individuals x10.

Key issues raised (A Spatial Vision for Wiltshire)	Respondent(s)
<b>Wiltshire's canals:</b> Canals contribute to the economy and provide significant benefits to active travel, health and wellbeing and the environment; and could be specifically referenced in the Infrastructure section.	Wilts and Berks Canal Trust.
<b>Providing new homes</b>	
<b>Recording of retrospective housing completions:</b> As the Local Plan is not going to be adopted before 2025, the housing requirement for the plan period should run from 2025 to 2045 and any completions prior to 2025 should be removed, and suitable additional housing sites should be allocated.	Paton Land.
<b>Housing requirement as 'a minimum':</b> The objective relating to housing growth should refer to the housing requirement as a minimum; The Spatial Vision should more clearly communicate the need to address the housing crisis in Wiltshire.	Barratt Homes (Bristol); Go South Coast Ltd; Great Tew Bantham Estates LLP.
<b>Delivery of housing types/tenures:</b> The Spatial Vision fails to appropriately identify how housing needs (type and quantity) throughout the plan period to 2038 will be met. The Spatial Vision should be amended to reflect the imperative to deliver a sufficient type, number, and range of housing, including affordable housing to meet identified housing needs.	European Property Ventures; Individuals x10.
<b>Development of brownfield sites:</b> The Spatial Vision should give priority to redevelopment of brownfield sites ahead of development on greenfield sites in less accessible locations.	Individuals x10.
<b>Efficient use of land:</b> Support the commitment to make effective use of land. Strategic site allocations should not be subject to rigid or restrictive criteria that would unreasonably limit their potential to deliver maximum efficiency.	Gleeson Land.
<b>Commitment to highest design quality:</b> Homes of the highest possible sustainable design and construction are needed to meet the challenges of the climate emergency and to address legally binding target of zero carbon by 2050. Requirements and wording needs to be clear and decisive; Concern that the reference to "decent" homes conflict with earlier commitments to "exceptional standards of design", "comprehensive high quality design standards" and "higher energy efficiency".	Individuals x10.
<b>Community led housing/neighbourhood planning:</b> The Spatial Vision should recognise the role of Localism and support small scale delivery of homes through community led development initiatives and neighbourhood planning.	Seend Community Land and Asset Trust; South West Housing Association Planning Consortium.
<b>Affordable housing delivery:</b> The Local Plan should better acknowledge the role of Housing Associations in providing affordable housing in Wiltshire, and to early active engagement in the preparation of planning proposals.	South West Housing Association Planning Consortium.

Key issues raised (A Spatial Vision for Wiltshire)	Respondent(s)
<p><b>The vision for rural communities:</b> Concern that there is no reference in the Spatial Vision to the needs of rural communities and meeting local needs in sustainable rural locations. The vision should extend to rural areas alongside urban centres; Housing in rural areas can enhance and maintain the vitality of rural communities. Planning policies should identify opportunities for rural growth, supporting local services.</p>	<p>Cotswold Homes; ERHA; Defence Infrastructure Organisation.</p>
<p><b>Housing allocations:</b> To ensure a robust five-year housing land supply the council should look to allocate a range of small, medium and strategic sites across all tiers of settlement in the hierarchy.</p>	<p>Longford Estate.</p>
<p><b>Allocation at Trowbridge/Hilperton:</b> Concern that the allocation at Trowbridge/Hilperton is contrary to the Outcome set at paragraph 2.11 to maintain the separate identity of outlying villages near to Principal Settlements. Alternative allocations west of Trowbridge should be sought; Concern that development at Hilperton does not support greater levels of self-containment.</p>	<p>Trowbridge Town Council.</p>
<p><b>Local character and distinctiveness:</b> Welcome the emphasis in paragraph 2.11 on the need for new homes to be designed and delivered in a manner that reinforces and respects the local character and distinctiveness of the local area.</p>	<p>Natural England.</p>
<p><b>Planning for strong and healthy communities</b></p>	
<p><b>Sports facilities:</b> The Local Plan should address the need for additional sports facilities (not only football pitches) which are a key enabler to health and mental wellbeing.</p>	<p>Individuals x10.</p>
<p><b>Nature for health:</b> The section misses the opportunity to improve nature's role in supporting healthy lifestyles and environments, such as striving to improve access to nature to reduce health inequalities. As written, there is a very narrow focus on sports activities.</p>	<p>Natural England.</p>
<p><b>Education/healthcare:</b> It is unclear how the outcome stated at paragraph 2.15, to match strategic growth with new education and healthcare provision will be achieved.</p>	<p>Individuals x10.</p>
<p><b>Healthcare access:</b> Concern that residents of west Wiltshire are not served by sufficiently accessible hospital services.</p>	<p>Individuals x10.</p>
<p><b>Phasing:</b> The delivery of new schools required to support development need to be phased to support additional requirements for schools.</p>	<p>Individuals x10.</p>
<p><b>Climate change</b></p>	
<p><b>Climate emergency:</b> Concern that the Local Plan/Spatial Vision makes insufficient reference to the scale of emission reductions required to meet carbon neutrality by 2030 or any methodology and pathways to measure progress against local and national commitments.</p>	<p>Wiltshire Climate Alliance; Chippenham Town Council; Save Chippenham; Individuals x10.</p>

Key issues raised (A Spatial Vision for Wiltshire)	Respondent(s)
<b>Traffic impacts on Bath:</b> Noted that through the Spatial Vision the balance between homes/jobs is intended to be maintained and therefore should not result in an increase in commuting into Bath.	Bath & North East Somerset Council.
<b>Outdated evidence:</b> Concern that evidence used to underpin the Local Plan is out of date and therefore not relevant to sustainability issues faced, therefore the plan is not sufficiently sustainability focused.	Individuals x10.
<b>Environmental quality</b>	
<b>Support:</b> Support the acknowledgement of the need to address issues strategically and systematically, including water and air pollution, managing recreational impacts on sensitive sites and protecting, creating and enhancing green/blue and nature networks in development areas and across the landscape.	Natural England.
<b>Link to neighbourhood planning:</b> The Local Plan should work with the policies and aspirations set by neighbourhood plans to ensure rural settlement identities are protected.	Individuals x10.
<b>Suitable Alternative Natural Greenspace at Trowbridge:</b> Concern that the proposed SANG at Hag Hill (Trowbridge) is poorly connected to the built environment and other blue-green infrastructure, accessible primarily by vehicle. Alternative location for growth west of Trowbridge could provide SANG linked to Southwick Country Park and the Lambrok Stream corridor with better links to the built environment.	Trowbridge Town Council.
<b>Environmental quality:</b> Concern that Environmental Quality as the last challenge plays down the importance of the environment and the state of the climate emergency currently being faced, which should be prioritised.	North Wessex Downs AONB.
<b>Preserving environmental quality:</b> The Spatial Vision challenges should more clearly articulate the challenge of preserving environmental quality whilst delivering growth. 'Environmental Quality' should be moved up to the top of list as it is a critical issue.	Cranborne Chase Area of Outstanding Natural Beauty.
<b>Protected landscapes:</b> Nationally protected landscapes / National Landscapes should be mentioned within the paragraphs 2.19 – 2.23.	North Wessex Downs Area of Outstanding Natural Beauty; Cranborne Chase Area of Outstanding Natural Beauty.
<b>Dark Skies:</b> The Vision should include an aspiration to reduce light pollution over the Local Plan period in order to reduce harm to wildlife and improve the wellbeing of humans.	Cranborne Chase Area of Outstanding Natural Beauty.
<b>Lack of ambition:</b> While the Spatial Vision commitment to enhance the environment is supported, given the scale and urgency of current environmental challenges stronger, more ambitious wording should be built into the Vision. Outcomes should be aligned to the EIP 2023 goals and a positive outcome added in relation to landscape-scale nature recovery partnerships and projects.	National Trust.



Key issues raised (A Spatial Vision for Wiltshire)	Respondent(s)
<b>Lack of clarity about impact mitigation:</b> Concern that the Spatial Vision states that environmental impacts will be mitigated but there is insufficient indication as to how this will be brought about.	Individuals x10.
<b>Historic setting of Salisbury:</b> Concern that development south of Salisbury (Policy 26) will destroy the historic setting of Salisbury from the south and erode separation to Britford.	Individuals x10.
<b>Air quality on the A36 Southampton Road:</b> There is conflict between the commitment to improve air quality at paragraph 2.21 and the development planned/committed to feeding on to the A36 Southampton Road.	Individuals x10.

## Local Plan section 3: Spatial strategy for Wiltshire

**5.23** Please see below the key issues tables listing the key issues raised for the parts of the plan within section 3: Spatial strategy for Wiltshire, namely:

- Policy 1: Settlement strategy
- Policy 2: Delivery strategy
- Policy 3: Reserve sites for housing and broad locations for growth
- Policy 4: Climate change strategy
- Policy 5: Infrastructure delivery
- Area strategies explained (from section 4, included here due to overarching nature of section)

Table 5.10 [Policy 1 - Settlement Strategy] key issues

Key issues raised (Policy 1 - Settlement Strategy)	Respondent(s)
<b>Conditional Support for the Settlement Strategy</b>	
<p><b>Acknowledgement:</b> Acknowledges that most new development will be focused in and around existing main settlements. Some of those settlements have greater ecological constraints than others but this appears to have been taken into account in the quantum of development proposed for different places and detailed in the area strategies.</p>	<p>Natural England</p>
<p><b>Policy 1 Strategy Overview:</b> Policy 1 aims to address housing and employment needs by targeting sustainable growth locations per the Wiltshire Core Strategy, enhancing self-containment. However, it lacks ambition and does not ensure housing delivery certainty.</p>	<p>LRM Planning on behalf of Bloor Homes; L&amp;Q Estates; Gleeson Land; RPS on behalf of Cotswold Homes; Richborough Estates; McLoughlin Planning on behalf of Richborough Estates; Barwood Land; Carter Jonas on behalf of David Wilson Homes; Waddeton Park; Carter Planning Ltd on behalf of Leda Properties Ltd; Boyer Planning on behalf of Land Value Alliances; Carter Jonas on behalf of Paul Bowerman Discretionary Trust and PH Bowerman Esq; Stantec on behalf of Barratt David Wilson Homes; Pegasus on behalf of Waddeton Park; Vistry Group; Hallam Land Management; Turley on behalf of Castlewood Ventures Ltd; Savills on behalf of Miller Homes; Redcliffe Homes on behalf of Porter; Whapshare and Pearce; Arrow Planning Ltd on behalf of Mr and Mrs McBain; Savills on behalf of Wyatt Homes; Savills on behalf of Society of Merchant Venturers; Boyer on behalf of Vistry Group; Vistry Group; Fowler Architecture &amp; Planning Ltd on behalf of Acorn Construction (Newbury) Ltd; Pegasus Group on behalf of Rosconn Strategic Land; Redcliffe Homes on behalf of Stephanie Davis; Copperfield L&amp;P on behalf of David Wilson Homes (Gate Farm, Chippeham); Savills on behalf of Lincoln College Oxford; Lichfields on</p>

Key issues raised (Policy 1 - Settlement Strategy)	Respondent(s)
	<p>behalf of St Phillips Land Ltd; Turley on behalf of Bloor Homes South West; Savills on behalf of Castlewood Commercial Properties (South Pavenhill Farm, Purton); Turley on behalf of Woodhouse Developments (Amesbury) Ltd; Bloor Homes Ltd (Southern Region); Bloor Homes (South West); Define Planning &amp; Design on behalf of Chippenham Riverside; Turley on behalf of Hills Homes; Tor&amp;co on behalf of Gleeson Land (Pound Farm, Lynham); Lichfields on behalf of Salisbury NHS Foundation Trust (SFT) and Salitem; Valencia Waste Management; Great Tew Bantham Estates LLP; Sport England; Savills on behalf of TOF Corporate Trustees Ltd/Oxford University Endowment Management; Savills (UK) Ltd on behalf of Railway Pension Nominees Ltd; Context Planning Ltd on behalf of Individual x1; Montague Evans on behalf of Individuals x10;</p>
<b>A strategy of constraint</b>	
<p><b>Policies 1 and 2 Strategy Overview:</b> Policies 1 and 2 set the planned growth strategy but are unambitious and fail to allocate enough land to sustain housing supply. The strategy reduces housing in key settlements due to unexplained and unjustified "constraints," rendering it unsound.</p>	<p>L&amp;Q Estates; Melksham Without Parish Council; Turley on behalf of Baker Estates; Savills on behalf of Miller Homes; Gleeson Land; North Wessex Downs National Landscape; Turley on behalf of Bloor Homes South West; Turley on behalf of Hills Homes; Claremont Planning Consultancy on behalf of European Property Ventures (Wiltshire); Preshute Parish Council; Gaiger Bros; Montague Evans on behalf of White Lion Land LLP; Carter Jonas on behalf of Hill Residential Land Ltd (Lawn Farm); Individuals x10.</p>
<p><b>Policy 2 Redundancy Issue:</b> Policy 2 redundantly repeats elements of Policy 1. It should instead clearly define the overall housing requirements for the four areas.</p>	
<p><b>Inappropriate Development Locations:</b> Policies 1 and 2 propose growth in unsuitable areas like Marlborough, a Market Town in the North Wessex Downs National Landscape, which should be excluded from the Swindon Housing Market Area.</p>	
<p><b>Lack of Support for Rural Housing:</b> Policy 1 overlooks and does not support rural house building.</p>	
<p><b>Environmental Constraints and Development:</b> Environmental constraints like flood risks, AONB, heritage, and landscape considerations should not hinder the proposed development levels in various locations.</p>	

Key issues raised (Policy 1 - Settlement Strategy)	Respondent(s)
<b>Plan period and level of planned growth</b>	
<b>Lack of Ambition in Policies 1 and 2:</b> Policies 1 and 2 are not ambitious enough and fail to provide sufficient development land or contingency options.	LRM Planning on behalf of Bloor Homes; L&Q Estates; Gleeson Land; Tor&co on behalf of White Horse Country Club; RPS on behalf of Cotswold Homes; Carter Jonas on behalf of David Wilson Homes; Waddeton Park; Cerda Planning on behalf of Kier Group Ltd; Emery Planning on behalf of Wain Estates Ltd; Pegasus Group on behalf of Barratt Homes; Pegasus Group on behalf of Waddeton Park; Metis Homes; Turley on behalf of Castlewood Venture Partnerships; Carter Jonas on behalf of Mac Mic Group; Lightwood Strategic; Blue Fox Planning on behalf of Hannick Homes & Developments Ltd; Woolfe Bond Planning on behalf of De Vernon Trustees; Turley on behalf of Baker Estates; Redcliffe Homes on behalf of Whapshare; Porter and Pearce; Impact Planning Services on behalf of Cotswold Ecohomes Ltd, Redcliffe Homes; Campaign for a Better Trowbridge; Calne Community Neighbourhood Plan Steering Group; Tor&co on behalf of Glesson Land (Land at Marden Farm, Calne, Lightwood Strategic); CPRE Wiltshire; Stantec on behalf of Kemble Business Park Estates.
<b>Soundness Concerns and Plan Period:</b> Concerns exist about the planned development amount and Plan period. The Plan should extend to at least 2040 per the National Planning Policy Framework (NPPF), requiring more housing land to ensure supply certainty.	
<b>NPPF Compliance Issue:</b> The Wiltshire Local Plan Review, expected in Q4 2024, provides only a 14-year period, not meeting NPPF's 15-year requirement, making the plan unsound.	
<b>Policy 1 Soundness Concerns:</b> Policy 1's goal of 36,740 homes from 2020 to 2038 raises soundness concerns. The Local Plan should extend to 2040 or 2041 to align with national advice.	
<b>Local Plan Base Date Issue:</b> The base date should be 2018, not 2020, to alleviate plan-led growth pressure on the town.	
<b>Fundamental Concerns with Growth Strategy:</b> The growth strategy represents a decline from the Core Strategy, questioning the soundness of the Settlement and Delivery Strategies, which fail to deliver sufficient housing.	
<b>Justification of New Settlement in Salisbury:</b> The proposed new Salisbury settlement is not justified. Alternatives like more housing in Chippenham and Trowbridge should be considered, as the proposed Housing Market Areas limit growth potential and flexibility.	
<b>Review of Growth Scale:</b> The overall growth scale needs review. Growth in higher-order settlements should increase, with more land identified in Market Towns to ensure soundness.	
<b>Objectively Assessed Need Calculation:</b> Turley calculates the need at 46,557 dwellings (2,217 per annum), higher than the 36,740 planned (2,041 per annum).	
<b>Housing Apportionment for Chippenham:</b> Applying the Wiltshire Core Strategy's disaggregation approach, Chippenham's housing should increase from 13,625 (765 per annum) to 17,226 (820 per annum).	
<b>Doubts on Site Allocations:</b> There are doubts about the timely delivery of proposed site allocations, which cover 63% of Wiltshire's housing requirement. Additional allocations are needed for delivery certainty.	
<b>Insufficient Growth in Rural Areas:</b> Growth in rural and lower-order settlements, like Large Villages, is insufficient and should be increased.	

Key issues raised (Policy 1 - Settlement Strategy)	Respondent(s)
<b>Hybrid Strategy for Housing Needs:</b> A hybrid of strategies CH-B and CH-C would better meet housing needs, especially for the elderly, which the current Plan fails to address adequately.	
<b>Policy Consistency with National Objectives:</b> It's unclear how Policies 1 and 2 align with national objectives to enhance rural community vitality and growth opportunities for villages.	
<b>Salisbury Housing Market Area Needs:</b> Salisbury will not meet assessed needs. Other settlements in the area should be considered for growth.	
<b>Broad Locations for Growth:</b> The strategy lists "Broad Locations for Growth" but doesn't explain how constraints will be addressed, especially with most development delayed due to Salisbury's constraints.	
<b>Long-Term Growth Commitments:</b> Unspecified longer-term growth areas do not contribute to a positive, ambitious housing and economic strategy.	
<b>Strategy Roll-Forward Issue:</b> The strategy merely continues the existing one without reassessing the suitability of growing Wiltshire's main settlements. A more radical approach with less emphasis on large greenfield allocations is needed.	
<b>Explanation of Housing Market Areas:</b> The Local Plan should clearly explain Housing Market Areas in Section 3 and how the first five policies meet strategic priorities. Currently, it does not conform to the NPPF.	
<b>Market Towns Development Potential:</b> Not all Market Towns can support significant development. Some have exceeded housing targets without matching employment and service growth.	
<b>Classification of settlements</b>	
<b>Inconsistency in Settlement Hierarchy:</b> The Plan inconsistently references the Settlement Hierarchy, including Principal Settlements and Market Towns under 'Main Settlements,' which is unclear in Policy 1.	Gleeson Land; Tor&co on behalf of Martin Grant Homes; Barratt Bristol; Trowbridge Town Council; Britford Parish Council; Copperfield on behalf of Barratt David Wilson Homes (Hullavington); Woolfe Bond Planning on behalf of Main Square (Brinkworth); Boyer on behalf of Taylor Wimpey Strategic Land; Hallam Land Management Ltd; Hilperton Parish Council with Hilperton Action Group; Community Action Whitley and Shaw (CAWS); Land Value Alliances LLP (LVA); Local Councillor; Tor&co on behalf of Gleeson Land (Land at Pound
<b>Identifying Sustainable Development Locations:</b> The Plan should identify the most suitable locations for sustainable development to meet needs, in line with NPPF and NPPG, ensuring flexibility and responsiveness as per NPPF paragraph 81.	
<b>Grouping of Settlements:</b> Policy 1 should group Principal Settlements and Market Towns as 'The Main Settlements' and revise the spatial strategy for clarity.	
<b>Reclassification of Lyneham:</b> Lyneham, currently classified as a Large Village, is suitable for development and should be a Local Service Centre. A Settlement Sustainability Assessment is needed to justify its classification.	

Key issues raised (Policy 1 - Settlement Strategy)	Respondent(s)
<p><b>Role of Hullavington:</b> Hullavington has a unique role with large-scale employment and should be acknowledged in Policy 1, which currently does not justify its function.</p>	<p>Farm, Lyneham); Master Land &amp; Planning on behalf of Ludgershall Homes; Troy Planning + Design on behalf of Amesbury Town Council.</p>
<p><b>Inconsistency in Large Village Identification:</b> The identification of Large Villages is inconsistent, making the draft Plan unsound and unjustified.</p>	
<p><b>Hilperton's Unique Role:</b> Hilperton, classified as a Large Village, serves a different purpose due to its proximity to Trowbridge, which should be recognised.</p>	
<p><b>Laverstock's Classification:</b> Laverstock has more services than Hilperton but is not classified as a Large Village. It should be upgraded due to its facilities and population.</p>	
<p><b>Updating Settlement Hierarchy:</b> The hierarchy should be updated to classify Laverstock &amp; Ford as at least a Large Village, given its size, population, and services.</p>	
<p><b>Britford's Inappropriateness for Housing:</b> Britford, a Small Village, is unsuitable for the housing scale indicated by Policy 26.</p>	
<p><b>Protection for Hilperton:</b> Hilperton should be protected from development and reclassified as a 'Constrained Settlement' due to constraints like bats and Green Belt, not to accommodate Trowbridge growth.</p>	
<p><b>New Classification for Hilperton:</b> Hilperton should be a 'Large Village on the edge of a Principal Settlement,' with allocations only serving Hilperton and not Trowbridge unless more sustainable alternatives are discounted.</p>	
<p><b>Acknowledgment of Amesbury's Classification:</b> Amesbury's status as a "constrained settlement" should be explicitly acknowledged in Policy 1.</p>	
<p><b>Role and influence of Swindon</b></p>	
<p><b>Failure to Consider Alternative Sites:</b> The Plan and its evidence overlook reasonable alternative sites on Swindon's western edge, assuming incorrectly that Wiltshire need not allocate housing land within Wiltshire's part of the Swindon Housing Market Area because Swindon Borough Council can meet its own needs.</p>	<p>Blue Fox Planning on behalf of Persimmon Homes (Wessex); DPDS Consulting on behalf of Taylor Wimpey Strategic Land (Lydiard Tregoze); Thames Valley Chamber of Commerce; Pegasus Group on behalf of GLP.</p>
<p><b>Lack of Consideration for Additional Housing Land:</b> Alternative Development Strategies did not consider additional housing land west of Swindon, wrongly arguing there is no unmet need and rejecting sites not adjacent to existing settlements or Swindon's built edge.</p>	
<p><b>Swindon's Classification in Settlement Hierarchy:</b> Policy 1 does not include Swindon in the settlement hierarchy, despite part of Swindon lying in Wiltshire. Swindon should be a Principal Settlement, with a portion of Wiltshire's growth directed there, as in the Core Strategy.</p>	

Key issues raised (Policy 1 - Settlement Strategy)	Respondent(s)
<b>Role of rural areas and lower-order settlements</b>	
<p><b>Naming Large and Small Villages:</b> Policy 1 does not name Large and Small Villages and restricts Large Settlements to meeting only their own needs, which is overly restrictive and unjustified, as Large Villages can meet broader needs.</p>	<p>RPS on behalf of Cotswold Homes; Blue Fox Planning Ltd on behalf of Persimmon Homes (Wessex)/Persimmon Homes (South Coast); LD&amp;PC Ltd; CPRE Wiltshire; L&amp;Q Estates; Turley on behalf of Bewley Homes; Keevil Parish Council; Tor&amp;co on behalf of Hannick Homes; Turley on behalf of Individuals x2; LRM Planning on behalf of Acorn Property Group; Redcliffe Homes on behalf of Porter; Whapshare and Pearce; Redcliffe Homes on behalf of Individual x1; Fowler Architecture &amp; Planning Ltd on behalf of Acorn Construction (Newbury) Ltd; Pegasus Group on behalf of Rosconn Strategic Land; Redcliffe Homes on behalf of Individual x1; Savills on behalf of Neston Park Estate; Redcliffe Homes on behalf of Individuals x3; Avison Young on behalf of The Orders of St John Care Trust; Savills on behalf of Hallam Land Management Ltd (Mayhew Road, Tisbury); Primetower Properties Ltd (Winterslow); Woodborough Parish Council; Lichfields on behalf of St Phillips Land Ltd; Knight Frank on behalf of a group of landowners; Knight Frank on behalf of Kington Farms Ltd; Feltham Properties Ltd; Home Builders Federation; Impact Planning Services Ltd on behalf of SW Logistics Ltd; LPC (Trull) Ltd; NJL Consulting; Cheverell Magna Parish Council; Individuals x10.</p>
<p><b>NPPF Compliance:</b> Policies 1 and 2 do not comply with NPPF paragraph 78, which requires planning policies to enable villages to grow and support local services.</p>	
<p><b>Rural Development Policies:</b> Policies should allow development in locations 'well related' to existing settlements, not just infill, to enable organic growth that matches the existing scale and form.</p>	
<p><b>Spatial Strategy and Village Clusters:</b> The strategy should recognise clusters of villages that provide a range of services within a reasonable distance, allowing sustainable substantial development. It should also recognise that new development could bring services to currently underserved settlements.</p>	
<p><b>Importance of Small Villages:</b> The Plan underestimates the importance of Small Villages, which should have more opportunities for small-scale residential development in Policy 1.</p>	
<p><b>Concerns with Housing Approach for Large Villages:</b> There are concerns about the housing approach for the 76 Large Villages and the Rural Housing Requirements Paper's assumptions, which do not account for villages that have exceeded supply through windfalls.</p>	
<p><b>Growth Opportunities in Villages:</b> Large and Small Villages can benefit from growth by supporting and creating services. The Local Plan Review should identify growth opportunities in these areas, supported by new homes and investment in facilities and services.</p>	
<p><b>Uncertainty in Land Supply Regulation:</b> Policy 1 recognises Local Service Centres like Market Lavington but does not allocate sites, creating uncertainty in land supply regulation.</p>	
<p><b>Development in Small Villages:</b> While previous plans limited Small Village development to infill, the emerging Plan allows development if it aligns with the settlement's character and appearance.</p>	
<p><b>Concerns Over Lower Tier Settlements:</b> There is a lack of detail on lower-tier settlements, which make up a significant part of Wiltshire's population. Local needs and requirements must be reflected to ensure sustainable growth.</p>	
<p><b>Focus on Higher Order Settlements:</b> The strategy overly focuses on higher-order settlements, ignoring the potential of rural areas, especially Large Villages, to meet strategic needs.</p>	



Key issues raised (Policy 1 - Settlement Strategy)	Respondent(s)
<p><b>Lack of Policy Definitions:</b> There is concern over the absence of policy definitions for rural exception sites, backland, and infill, which could permit inappropriate development.</p>	
<p><b>Support for Small Scale Schemes:</b> The Settlement Strategy should support small-scale open market schemes meeting local needs, with criteria like suitable access and compliance with character. The infill restriction in Small Villages should be broadened to include well-related sites.</p>	
<p><b>Impact of Development on Villages:</b> Development in villages without services, like Rowde and Bromham, will lead to out-commuting to access services, exacerbating air quality issues in places like Devizes.</p>	
<p><b>Role of brownfield land</b></p>	
<p><b>Redevelopment of Brownfield Land:</b> The Settlement Strategy does not accommodate the redevelopment of brownfield land in the countryside, contrary to NPPF guidelines that emphasize using brownfield land to meet development needs.</p>	<p>LPC (Trull) Ltd on behalf of Individual x1; LPC (Trull) Ltd; Wiltshire Climate Alliance; Individuals x10.</p>
<p><b>Prioritizing Brownfield Sites:</b> Brownfield sites like Churchfields should be prioritized over large greenfield sites for development.</p>	
<p><b>Silence on Brownfield Redevelopment:</b> The draft Plan does not address housing or employment opportunities through brownfield site redevelopment in the countryside, failing to align with the National Planning Policy Framework.</p>	
<p><b>Settlement Boundaries</b></p>	
<p><b>Review of Melksham's Settlement Boundary:</b> Melksham's settlement boundary should be revised to include the recently permitted Glenmore Farm application, ensuring housing land supply certainty.</p>	<p>Boyer Planning on behalf of Land Value Alliances; Alderbury Parish Council; Tor&amp;co on behalf of Martin Grant Homes; Tetlow King Planning on behalf of Terra Strategic; Blue Fox Planning on behalf of Persimmon Homes Wessex/Crest Nicholson South and Summix Ltd; Crest Nicholson South West and Summix Ltd; Pegasus Group on behalf of Dick Lovett Ltd; Individuals x10</p>
<p><b>Updating Melksham's Settlement Boundary:</b> Melksham's boundary needs updating to reflect recent planning decisions, including Berryfields, which should be classified as part of the town, not a Small Village.</p>	
<p><b>Need to Update Settlement Boundaries:</b> The strategy does not update settlement boundaries to include recent planning permissions like PL/2022/08155, which support town growth and should be part of the development plan policy.</p>	
<p><b>Lack of Policy Framework:</b> Policy 1 lacks a framework for considering sites outside settlement boundaries or adjacent to neighbouring authorities like Swindon.</p>	
<p><b>Redrawing Chippenham's Boundary:</b> Chippenham's boundary should include land at North Chippenham, now part of the town's built-up edge.</p>	

Key issues raised (Policy 1 - Settlement Strategy)	Respondent(s)
<p><b>Review of Settlement Boundary Methodology:</b> The methodology for defining settlement boundaries should be reviewed to include older site allocations with existing planning permissions in Principal Settlements.</p>	
<p><b>Insufficient Weight to Settlement Boundaries:</b> Settlement boundaries are not given enough consideration in the decision-making process.</p>	
<p><b>Unsoundness of Paragraph 3.7:</b> Paragraph 3.7 is unsound because it removes land purchased by developers from the 5-year availability list, leading to more applications favouring development outside settlement boundaries.</p>	
<p><b>Speculative Development:</b> Treating settlement boundaries as merely advisory leads to speculative development in inappropriate locations.</p>	
<p><b>Infrastructure</b></p>	
<p><b>Infrastructure Needs:</b> Policy 1 does not ensure developers will meet the infrastructure needs of new developments or support existing communities already under strain.</p>	<p>Go South Coast Ltd; Wiltshire Scullers; DLP Planning Ltd on behalf of Royal Wootton Bassett Town Council; Troy Planning + Design on behalf of Amesbury Town Council; Worton Parish Council; Environment Agency; Individuals x10.</p>
<p><b>Transport Considerations:</b> The Plan fails to consider transport issues from first principles and does not ensure that development distribution maximizes public transport use.</p>	
<p><b>Policy 1 and Infrastructure:</b> Policy 1 is not consistent with national policy and does not guarantee infrastructure support for development. It should be revised to align with NPPF paragraphs 95 and 110, ensuring that infrastructure improvements, including school places and highway enhancements, are delivered alongside growth.</p>	
<p><b>Lack of Services in Amesbury:</b> Amesbury lacks several essential services, including health facilities, 16+ education, and leisure amenities. Despite significant housing and employment growth, the Local Plan does not address how to deliver these services to support Amesbury as a Market Town.</p>	
<p><b>Support for Sport and Leisure Infrastructure:</b> The Plan should enhance support for sport and leisure infrastructure, including rowing facilities.</p>	
<p><b>Environmental Impact and Infrastructure Needs:</b> The Plan does not address strategic infrastructure needs, particularly for traffic connecting the south-east and north-west of the county. Increased housing in Salisbury, Chippenham, Melksham, and Trowbridge will increase traffic through villages like Worton, which is not addressed in the Plan's Strategic Transport Route Map. Mitigation measures are needed to manage traffic impacts.</p>	
<p><b>Environmental Capacity Concerns:</b> Several treatment works, including those in Pewsey, Upavon, Netheravon, Amesbury, and others, may exceed environmental capacity by 2035. This needs to be addressed under the Water Framework Directive and/or the Habitats Directive.</p>	

Key issues raised (Policy 1 - Settlement Strategy)	Respondent(s)
<p><b>Recommendation for Water Cycle Studies:</b> The Environment Agency recommends Water Cycle Studies to align with policies 45 and 46. Guidance is available on GOV.UK for conducting these studies, which consider Water Company Business Plans and Drainage and Wastewater Management Plans.</p>	
<p><b>Benefits of Water Cycle Studies:</b> Water Cycle Studies would ensure consideration of other stakeholder plans and help refine the scope of infrastructure development, benefiting the Local Plan by aligning with Water Company Business Plans and Drainage and Wastewater Management Plans.</p>	
<p><b>Role of neighbourhood planning</b></p>	
<p><b>Flexibility for Neighbourhood Plans:</b> Allow Neighbourhood Plans more flexibility to allocate housing suitable for their community, rather than being limited by rigid 'maximum' targets, enabling greater growth if appropriate.</p>	<p>Feltham Properties Ltd; North Bradley Parish Council; Southwick Parish Council;</p>
<p><b>Integration with Neighbourhood Plans:</b> The Local Plan should align with the vision, objectives, and policies of neighbourhood plans affecting Trowbridge Principal Settlement, particularly landscape setting gap policies. This alignment should be reflected in Policy 1.</p>	
<p><b>Omission Sites (Sites which have been excluded from the Regulation 19 Local Plan)</b></p>	
<p><b>Swindon HMA:</b></p> <ul style="list-style-type: none"> <li>· Land at Washpool, Swindon</li> <li>· Nine Elms, Swindon, and</li> <li>· Land at Kington Farm, Aldbourne.</li> </ul>	<p>Blue Fox Planning Ltd on behalf of Persimmon Homes (Wessex); Emery Planning on behalf of Hollins Strategic Land and Wain Estates; Tor&amp;co on behalf of White Horse Country Club Ltd; WSP on behalf of Defence Infrastructure Organisation; Carter Jonas on behalf of Mac Mic Group; Savills on behalf of Lincoln College, Oxford; Knight Frank on behalf of Kington Farms Ltd; Tor&amp;co on behalf of Gleeson Land; Carter Jonas on behalf of Paul Bowerman Discretionary Trust and PH Bowerman Esq; Pegasus Group on behalf of Barratt Homes; Copperfield on behalf of Barrett David Wilson Homes (North of Stanley Lane); Blue Fox Planning Ltd on behalf of Hannick Homes &amp; Development Ltd; Richard Greenwood on behalf of the Bailey Family;</p>
<p><b>Chippenham HMA:</b></p> <ul style="list-style-type: none"> <li>• Station Road, Christian Malford</li> <li>• Land at Sherston Road, Malmesbury</li> <li>• Azimghur Barracks and Colerne Airfield, Colerne</li> <li>• Land at Marden Farm, Calne, and</li> <li>• Land north of Stanley Lane, Chippenham.</li> </ul>	
<p><b>Trowbridge HMA:</b></p>	

Key issues raised (Policy 1 - Settlement Strategy)	Respondent(s)
<ul style="list-style-type: none"> <li>· Turnpike Close, Semington</li> <li>· Land at White Horse Country Club, Westbury, and</li> <li>· Available and deliverable land at Warminster (unspecified).</li> </ul>	
<p><b>Salisbury HMA:</b></p> <ul style="list-style-type: none"> <li>· Ford Farm Net Zero Community, near Laverstock, Salisbury, and</li> <li>· Available and deliverable land at Amesbury (unspecified).</li> </ul>	
<p><b>Other comments</b></p>	
<p><b>Support for Deleting Core Policy 25:</b> The proposal to delete Core Policy 25 related to Old Sarum Airfield is supported, as development applications for this site are inappropriate.</p>	<p>Salisbury Area Music Co-operative; Wiltshire Wildlife Trust; Blue Fox Planning Ltd on behalf of Presscredit (Rudloe) Ltd; Individuals x10.</p>
<p><b>Harmful Impact of the Draft Plan:</b> The draft Plan negatively impacts the local economy, natural environment, traffic congestion, and flooding, without providing sufficient local amenities such as schools, doctors, and dentists for new occupants.</p>	
<p><b>Objections to the Current Plan:</b> The plan is objected to for failing to meet climate and UK emissions targets, conservation requirements, and true housing and road needs.</p>	
<p><b>Issues with Consultation Process:</b> The consultation process introduced new development sites without justification or notification, making the Plan unsound and legally non-compliant as all local residents were not notified or invited to comment.</p>	
<p><b>Outdated Data in the Plan:</b> The Plan is based on outdated and irrelevant data, particularly concerning legislative targets for carbon reduction, rendering it unsound.</p>	
<p><b>Definition of Sustainable Development:</b> Policy 1 lacks a clear definition of sustainable development. To align with national policy, it should emphasize restoring wildlife habitats and preserving existing sites and species.</p>	
<p><b>Overdue Local Plan:</b> The draft Local Plan is three years overdue and still lacks details on planned, approved, or proposed housing expansion in Mere.</p>	
<p><b>Amendments for Corsham and Rudloe:</b> The Plan should be amended to recognise the relationship between Corsham and Rudloe and acknowledge suitable proposals beyond local needs in Policy 1 and related sections.</p>	

Key issues raised (Policy 1 - Settlement Strategy)	Respondent(s)
<p><b>Environment:</b> The Spatial Strategy section of the Local Plan should prioritise the preservation of the environment upfront, ensuring this influences the strategies and allocation numbers.</p>	<p>Cranborne Chase Area of Outstanding Natural Beauty.</p>

Table 5.11 [Policy 2 - Delivery Strategy] key issues

Key issues raised (Policy 2 - Delivery Strategy)	Respondent(s)
<b>Plan period and level of planned growth</b>	
<p><b>Extend Plan period:</b> Extend the plan period to at least 2040 to ensure a minimum of 15 years post-adoption. This allows for robust strategic planning, supports growth requirements, aligns with national policy, and addresses past delays. The extension requires changes to housing and employment requirements.</p>	<p>Miller Homes; St Modwen Logistics; Go South Coast Ltd; Land Value Alliances; Barratt Bristol; Castlewood Venture Partnerships; TOF Corporate Trustees Ltd; St Philips Land Ltd; Bellway Homes; Bloor Homes South West; Castlewood Commercial Properties; Leda Properties Ltd; Woodhouse Developments and Bloor Homes; Hills Homes; Taylor Wimpey Strategic Land; Hallam Land Management; Barwood Land; Vistry Group; Barratt David Wilson Homes; David Wilson Homes; Redcliff Homes; Society of Merchant Venturers; Neston Park Estate; Paul Bowerman Discretionary Trust; RWB Town Council; Hannick Homes; Great Tew Bantham Estates; De Vernon Trustees; Wellbeck Strategic Land II LLP; St Modwen Logistics and the Sealy Family Trust; Lincoln College, Oxford; Persimmon Homes (South Coast) Ltd; Cala Homes (Thames) Ltd; Chippenham Riverside; Gladman; Presscredit (Rudloe) Ltd.; Quidhampton Developments Ltd; Barratt Homes and Vistry; Steven Graver Ltd; Waddeton Park Ltd; Messrs Gorrings, Bennett and Marks; Barratt Homes Group; Cala Homes; Mac Mic Group; Robert Hitchens; Individuals x10.</p>
<p><b>Timeframe for major settlement expansions:</b> A timeframe beyond 2040 is necessary for major settlement expansions like Showell Farm in Chippenham.</p>	<p>Castlewood Commercial Properties</p>

Key issues raised (Policy 2 - Delivery Strategy)	Respondent(s)
<b>Lack of clarity:</b> Policy 2 lacks clarity, with unjustified lower housing figures, misalignment with previous objectives and past housing delivery rates.	Melksham Without Parish Council; Swindon Borough Council; Go South Coast Ltd; Gladman; Wain Homes; Quidhampton Developments Ltd; Robert Hitchens; Individuals x10.
<b>Inconsistent with national policy:</b> The plan fails to meet NPPF requirements to boost housing supply, risking negative outcomes for Wiltshire. It prioritises employment land for housing without specific site identification, leading to potential inaccuracies. Testing site deliverability is needed for compliance.	Melksham Without Parish Council; Swindon Borough Council; Go South Coast Ltd; Gladman; Wain Homes; Quidhampton Developments Ltd; Robert Hitchens; Individuals x10.
<b>Housing trajectory</b>	
<b>Flexibility and realistic planning:</b> The plan should remain adaptable to changes and allocate additional sites if needed to maintain a diverse and robust land supply.	Go South Coast Ltd.
<b>Alignment with strategic objectives:</b> Ensure housing and employment growth aligns with the Local Plan's goals for economic growth, housing, and infrastructure.	Gleeson Land.
<b>Clarity on housing needs:</b> Clearly outline how local housing needs will be met, including a housing supply components table and detailed trajectory.	Bloor Homes SouthWest.
<b>Affordable housing provision:</b> Early housing delivery should be prioritised to address concerns about the impact on affordable housing due to stepped housing requirements.	South West Housing Association Planning Consortium; Bloor Homes (South West).
<b>Phased housing delivery:</b> Recommend a phased housing delivery approach to mitigate environmental impacts, especially on wastewater treatment and the River Avon.	Newland Homes.
<b>Phasing of housing requirement concerns:</b> The proposed phasing may lead to early and middle-stage shortfalls and over-reliance on later high delivery rates, failing to meet NPPF guidelines. Revise to ensure a steady delivery rate and identify additional deliverable sites for resilience. Appendix C should detail deliverable sites for 2025-2030, developable sites for 2031-2035, and potential growth locations for 2036-2040, re-evaluating the role of various sites early in the Plan period.	Berkeley Strategic Land, Barratt Homes; Castlewood Venture Partnerships; TOF Corporate Trustees Ltd; St Philips Land Ltd; Bellway Homes; Bloor Homes South West; Castlewood Commercial Properties; Woodhouse Developments and Bloor Homes; Hills Homes; Hallam Land Management; Barwood Land; Vistry Group; Barratt David Wilson Homes; Society of Merchant Venturers; David Wilson Homes; The Crown Estate; The

Key issues raised (Policy 2 - Delivery Strategy)	Respondent(s)
	Huggett Family; Rosconn Strategic Land; Wellbeck Strategic Land II LLP; Lincoln College; Oxford, Catesby Estates; Go South Coast Ltd; Persimmon Homes (South Coast) Ltd; Gladman; Wain Homes; Barratt Homes and Vistry; Steven Graver Ltd; Waddeton Park Ltd; Mac Mic Group; Robert Hitchens; Individuals x10.
<b>Housing numbers</b>	
<b>Buffer for housing:</b> Introduce a 5% buffer to the housing requirement to account for uncertainties.	Miller Homes.
<b>Contingency allowance:</b> Add a 10% contingency allowance in Chippenham and Melksham to ensure sufficient land for housing demands.	Bloor Homes SouthWest.
<b>Clarification on housing targets:</b> Address concerns about the alignment of government-set housing targets with Wiltshire's actual needs.	Tisbury Parish Council.
<b>Reassessing housing requirements:</b> Reevaluate the necessity of meeting the full target of 36,740 dwellings, considering local resistance and true housing needs.	Individuals x10.
<b>Five-Year housing supply policy:</b> Review policy to support community-led neighbourhood planning, considering Warminster Town Council's opposition.	Warminster Town Council.
<b>Housing supply post-2023:</b> Strategize to prevent a housing supply shortfall after 2028 to support community development.	Warminster Town Council.
<b>Housing needs assessment:</b> Prioritise assessing housing needs before considering constraints.	Miller Homes.
<b>Housing numbers in Trowbridge HMA:</b> Justify the reduction in housing numbers for Trowbridge HMA and ensure a transparent evaluation of alternatives.	Bellway Homes.
<b>Chippenham HMA housing strategy:</b> Assess alternative development strategies for Chippenham HMA, reassess housing numbers, and ensure the strategy meets local needs and infrastructure requirements.	Bellway Homes.
<b>Raising housing targets:</b> Increase housing targets beyond the government's standard method to meet NPPF directives, support affordable housing, economic growth, and public infrastructure. Set annual targets at a minimum of 2,200, include a 5% buffer, and distribute evenly across the county.	Land Value Alliances; Castlewood Venture Partnerships; Bellway Homes; Bloor Homes South West; Castlewood Commercial Properties; Woodhouse Developments and



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	Bloor Homes; Hills Homes; Taylor Wimpey Strategic Land; Hallam Land Management; Vistry Group; Redcliff Homes; Society of Merchant Venturers; The Crown Estate; Rosconn Strategic Land; Catesby Estates; Presscredit (Rudloe) Ltd; Newland Homes; Wyatt Homes; Metis Homes; European Property Ventures (Wiltshire); Chippenham Riverside; Redrow Homes; Gladman; Wain Homes; Messrs Goringe, Bennett and Marks; Mac Mic Group; Robert Hitchens; and Individuals x10.
<b>Environmental considerations:</b> Avoid overestimating housing needs to prevent environmental risks.	Chippenham Town Council; Save Chippenham.
<b>Chippenham housing and land use:</b> Reduce housing requirements for Chippenham, focusing on windfall sites and brownfield land for sustainable development.	Chippenham Town Council.
<b>Calculation of housing requirement</b>	
<b>Minimum housing requirement:</b> The plan should consider 36,740 dwellings as the absolute minimum, using 2014 projections to aim for at least 45,630 houses over 2020-2040, as suggested by the 2019 LHNA.	Mac Mic Group; Hills Residential Ltd; St Philips Land Ltd; Bellway Homes; Leda Properties Ltd; Taylor Wimpey Strategic Land; Hallam Land Management; Barwood Land; Redcliff Homes; Society of Merchant Venturers; Paul Bowerman Discretionary Trust; Rosconn Strategic Land; Master Land & Planning; Bloor Homes South West; Wain Homes, and Individuals x10.
<b>Increased housing requirement:</b> Recommend a 10-20% increase in housing to address affordable housing and elderly accommodation needs, aiming for 40,840 to 45,630 homes.	Mac Mic Group; Hills Residential Ltd; St Philips Land Ltd; Bellway Homes; Leda Properties Ltd; Taylor Wimpey Strategic Land; Hallam Land Management; Barwood Land; Paul Bowerman Discretionary Trust; Vistry Group; Great Tew Bantham Estates; Rosconn Strategic Land; Master Land & Planning, and Individuals x10.

Key issues raised (Policy 2 - Delivery Strategy)	Respondent(s)
<b>Certainty over 'approximate' targets:</b> Clearly identify housing requirements as net minimums, avoiding the use of 'approximately,' per NPPF guidelines.	Cotswolds Ecohomes; Metis Homes.
<b>Accurate data for projections:</b> Reconcile differences between LHNA figures and Council methodology using the April 2022 Housing Land Supply Statement and up-to-date data.	Paul Bowerman Discretionary Trust; Catesby Estates; Cala Homes (Thames) Ltd, and Individual x10.
<b>Affordable housing analysis:</b> The current affordable housing calculation is inadequate. A comprehensive analysis is necessary to meet the growing demand.	Mac Mic Group; Individuals x10
<b>Exclusion of pre-2022 developments:</b> Recalculate housing requirements excluding developments prior to 2022 for a clearer future needs picture.	De Vernon Trustees.
<b>Demographic projections:</b> Reevaluate 2014-based projections, considering newer evidence, and adjust standard method projections to reflect actual population growth, especially for those aged 65 and over.	Go South Coast Ltd; Metis Homes.
<b>Immigration and housing needs:</b> Broaden housing needs assessments to include sector-critical incoming individuals, refugees, and asylum seekers, reflecting diverse demographic needs.	Individuals x10.
<b>Economic impact on housing:</b> Clarify how economic growth and delivery influence housing calculations. Publish the full housing trajectory with site-by-site delivery data for transparency.	Society of Merchant Venturers; Great Tew Bantham Estates; Go South Coast Ltd, and Individuals x10.
<b>Housing supply sources:</b> Ensure assumptions behind housing supply sources are credible and detailed, backed by solid evidence, to avoid incorrect capacities or double counting.	Steven Graver Ltd; Waddeton Park; Barratt Homes Group; Robert Hitchens.
<b>Housing requirement figures:</b> Address discrepancies between Policy 2 figures and those in paragraphs 3.31/3.32 by aligning or clarifying to ensure consistency for effective housing planning.	Wiltshire Climate Alliance.
<b>Size and type of housing development</b>	
<b>Diverse housing solutions:</b> Advocate for a broader range of housing solutions, including smaller-scale developments to meet various community needs.	Pewsey Green.
<b>Smaller homes and renovations:</b> Promote smaller homes and renovate underutilized properties. Integrate Community Land Trusts and self-build schemes into Neighbourhood Plans.	Pewsey Green.
<b>Circular housing strategy:</b> Develop a circular housing strategy for suitable single or dual occupancy homes, promoting downsizing for older adults to free up family homes.	Pewsey Green.

Key issues raised (Policy 2 - Delivery Strategy)	Respondent(s)
<b>Downsizing for older adults:</b> Create smaller homes for older adults to downsize within their communities, freeing up larger homes for younger families.	Pewsey Green.
<b>Elderly accommodation:</b> Recognise the need for elderly accommodation and set specific targets, particularly in rural areas.	Mac Mic Group; Hills Residential Ltd; Leda Properties Ltd; Cotswolds Ecohomes.
<b>Affordable housing strategy:</b> Address affordable housing needs and delivery rates, noting Wiltshire's increased affordability ratio. Propose policies to manage the impact of second homes on market stability and affordability.	Presscredit (Rudloe) Ltd; Go South Coast Ltd; Metis Homes; European Property Ventures (Wiltshire); Individuals x10.
<b>Site allocations</b>	
<b>Reassess housing allocations:</b> Reevaluate housing allocations to support higher development levels and ensure certainty in meeting housing needs with additional site allocations.	Bloor Homes SouthWest; Miller Homes.
<b>Site allocations in Chippenham and Melksham:</b> Allocate additional sites, especially north of the A3102, to meet housing demands sustainably.	Bloor Homes SouthWest.
<b>Ford Farm development:</b> Update Key Diagram Figure 3.1 to designate Ford Farm as a Net Zero Carbon model community in the Salisbury Area.	The Bailey Family.
<b>Strategic allocation language:</b> Address concerns about the plan's language and approach to identifying strategic development allocations.	Go South Coast Ltd.
<b>Sustainability appraisal discrepancies:</b> Ensure thorough testing of strategic alternatives for Chippenham to support evidence-based decisions and infrastructure delivery.	L&Q Estates.
<b>Increase housing allocations:</b> Identify additional suitable land and include a 10% to 20% buffer in the housing supply, especially in Salisbury.	Castlewood Venture Partnerships; St Philips Land Ltd; Bloor Homes South West; Leda Properties Ltd; Woodhouse Developments and Bloor Homes; Vistry Group.
<b>Diversification of housing allocations:</b> Reduce reliance on large urban extensions by allocating medium and smaller housing sites across Market Towns, Service Centres, and Villages. Reconsider build-out rates and protect sites with planning consent.	Land Value Alliances; Barratt Bristol; Bloor Homes South West; Vistry Group; Gleeson Land; Individuals x10.
<b>Greenfield site benefits:</b> Recognise the potential of greenfield sites near existing settlements for family-sized and affordable housing.	European Property Ventures (Wiltshire).

Key issues raised (Policy 2 - Delivery Strategy)	Respondent(s)
<b>Sustainable development focus:</b> Focus on locations for sustainable development to meet identified needs throughout the plan period.	Gleeson Land.
<b>Scrutiny of assumptions and trajectories:</b> Thoroughly examine the plan's assumptions and detailed trajectories to ensure feasibility, especially for strategic allocations.	Barratt Homes; Vistry.
<b>Correction of allocation discrepancies:</b> Adjust proposed allocations to accurately reflect the housing supply as indicated in the Housing Delivery Paper.	Robert Hitchens.
<b>Distribution of growth</b>	
<b>Deferral justification needed:</b> The Local Plan lacks clear reasoning for delaying development land identification for larger settlements. A solid justification and commitment to identify and test potential sites are necessary.	Go South Coast Ltd.
<b>Strategy flexibility:</b> The settlement strategy should be flexible to foster sustainable growth.	Miller Homes.
<b>Housing distribution clarity:</b> The approach to housing distribution across Housing Market Areas (HMAs) is confusing. The spatial strategy should be evidence-based and consider a range of options to meet local housing needs.	Bellway Homes.
<b>Growth distribution and monitoring:</b> Growth should focus on main settlements like Chippenham, Salisbury, and Trowbridge to combat climate change and ensure sustainable development. Continuous dialogue with B&NES and regular monitoring are essential.	Bath and North East Somerset Council.
<b>Growth distribution:</b> There is a lack of an effective and coordinated strategy to deliver housing across the county, with a disproportionate number in and around Salisbury.	Individuals x10.
<b>Policy amendment for Salisbury HMA:</b> The policy for Salisbury HMA needs amending to address delayed site identification and ensure soundness.	Gleeson Land.
<b>Understanding constraints in settlements:</b> The plan must address constraints in settlements like Marlborough, Malmesbury, and Corsham and include measures to tackle them.	Individuals x10.
<b>Hilperton allocation removal:</b> Remove Hilperton housing allocation beyond its settlement boundary due to inconsistency. Consider alternative locations west of Trowbridge for sustainable development.	Trowbridge Town Council.
<b>Market Town development:</b> Develop plans to promote growth and development in Market Towns, not just serve as bedroom communities.	Individuals x10

Key issues raised (Policy 2 - Delivery Strategy)	Respondent(s)
<b>Amesbury classification review:</b> The classification of Amesbury as a constrained settlement lacks sufficient evidence and needs review. Remove Amesbury from Table 3.2 and address flaws in the council's sustainability appraisal.	Classmaxi Limited; Lincoln College Oxford.
<b>Tisbury housing reassessment:</b> Reevaluate Tisbury's housing allocation due to environmental constraints like flooding.	Tisbury Parish Council.
<b>Marlborough housing justification:</b> Reevaluate Marlborough's housing allocation of 600 houses based on transparent criteria and community involvement.	Individuals x10
<b>High-density sustainable housing:</b> Plan for smaller, high-density housing that promotes walking, cycling, and public transport, using less greenfield land and aligning with biodiversity and Climate Emergency Policies.	Campaign for a Better Trowbridge.
<b>Planning framework accuracy:</b> Amend the planning framework to support rural development, tourism, heritage conservation, and sustainable community growth.	De Vernon Trustees; Hills Homes; Conlon Ltd; Bloor Homes South West Ltd, and Individuals x10.
<b>Diverse housing delivery strategy:</b> Review the housing delivery strategy for a broader range of options and clarity on phasing and reallocating growth to less constrained areas.	Formula Land (Downton) Ltd; Newland Homes; Bellway Homes.
<b>Sustainability appraisal critique:</b> The Sustainability Appraisal should consider all reasonable alternatives, especially increased growth potential at Bradford-on-Avon.	Cala Homes (Thames) Ltd.
<b>Sustainable site allocation:</b> Allocate more sites in sustainable locations, following a clear spatial strategy to meet development needs and ensure adequate land allocation.	Robert Hitchens; Chippenham Riverside.
<b>Broad locations for growth</b>	
<b>Growth location reassessment:</b> Reevaluate broad growth locations to meet housing needs effectively.	Bloor Homes SouthWest.
<b>Housing delivery and growth clarity:</b> The Plan needs specific provisions and a clearer housing trajectory, focusing on less constrained areas.	Gleeson Land.
<b>Detail and planning extension:</b> Extend the plan period and provide viability evidence for a new community at Salisbury due to insufficient detail and deferred strategic planning.	Bloor Homes SouthWest; Persimmon Homes Wessex; Persimmon Homes SouthCoast.
<b>New site identification:</b> Identify and test suitable development sites near Chippenham, Melksham, and Trowbridge immediately.	Go South Coast Ltd.
<b>Local Plan revision:</b> Revise Paragraph 3.29 to allocate land for housing and employment until at least 2040.	Barratt David Wilson Homes.

Key issues raised (Policy 2 - Delivery Strategy)	Respondent(s)
<b>Housing delivery discrepancy:</b> Address the shortfall against identified needs in the Housing Delivery Paper with a more robust approach and short-term deliverable housing land.	Barratt Bristol; St Philips Land Ltd; Bloor Homes South West; Woodhouse Developments; Bloor Homes; Barratt David Wilson Homes.
<b>Site clarity and delivery:</b> Clarify specific sites or growth locations to avoid backloaded housing delivery.	Barratt David Wilson Homes.
<b>Broad location specification:</b> Detail how Broad Locations for Growth can meet increased housing needs or address delivery shortfalls early in the Plan period.	Barratt David Wilson Homes; Bloor Homes South West; The Huggett Family; David Wilson Homes.
<b>Infrastructure support concerns:</b> Address potential lack of infrastructure support for broad growth areas.	Individuals x10.
<b>New community impact:</b> Consider negative impacts of a new community north of Amesbury on Salisbury Plain.	Netherhampton Parish Council; Bloor Homes South West.
<b>New community clarity:</b> Clarify the location, contribution, and purpose of the new community within the Housing Delivery Paper.	Robert Hitchens Ltd.
<b>Identifying growth locations:</b> Specify the timing and process for identifying growth locations within settlements to comply with NPPF guidelines.	Robert Hitchens Ltd.
<b>Allocation deferral criticised:</b> Avoid deferred allocations to subsequent Site Allocations Plans to prevent unsustainable practices.	Robert Hitchens Ltd.
<b>Site detail required:</b> Provide specific site details to meet NPPF requirements and reduce uncertainty.	Robert Hitchens Ltd.
<b>Salisbury New Community planning:</b> Address the shortfall of 1,630 dwellings in the Salisbury HMA with a new community of 1,500-2,000 homes, ensuring adequate facilities and sustainable transport options.	New Forest District Council.
<b>Reserve sites</b>	
<b>Reserve site strategy critique:</b> The current strategy favors constrained settlements. An allowance for non-implementation is needed to meet housing requirements. Delete paragraphs 3.42 and 3.43 and amend Policy 3 for a more equitable approach.	Redrow Homes.
<b>Reserve site principle and implementation:</b> The principle is supported, but the limited number and location in constrained settlements are criticised. Reevaluation of their scale and location is suggested.	Bloor Homes SouthWest; Persimmon Homes Wessex & Persimmon Homes SouthCoast; and Gleeson Land.

Key issues raised (Policy 2 - Delivery Strategy)	Respondent(s)
<b>Reserve site allocation concerns:</b> Exclusion of reserve sites from allocations is a concern. Inclusion is needed for a comprehensive housing delivery approach.	Kitewood Estates Ltd.
<b>Reserve site delivery details:</b> More details on delivery during the Plan period are needed. Current status and effectiveness are questioned. Suggestions include identifying more reserve sites, avoiding constrained settlements, and favoring major growth centers, with an analysis of alignment with place-shaping priorities and settlement strategies.	TOF Corporate Trustees Ltd; Bellway Homes; Bloor Homes South West; Woodhouse Developments and Bloor Homes; Vistry Group; The Crown Estate; Hannick Homes; Robert Hitchens.
<b>Windfall development</b>	
<b>Windfall reliance caution:</b> Heavy reliance on windfall allowances, especially from large opportunities, is discouraged.	Bloor Homes SouthWest; Kitewood Estates Ltd.
<b>Windfall underestimation impact:</b> Underestimating housing delivery from windfall and small sites could lead to unnecessary allocations. Adequate consideration of small sites' housing potential is needed.	Melksham Town Council; Melksham Without Parish Council.
<b>Windfall overestimation risks:</b> Overestimating windfall and small site delivery may hinder a flexible and robust supply of major sites. A justified approach with explicit figures is necessary.	Woodhouse Developments; Bloor Homes; Hills Homes; Bloor Homes South West; PrimeTower Properties [2413]; The Huggett Family.
<b>Infill development definition:</b> The omission of the former infill definition may encourage overdevelopment. The Council should retain the current definition or clarify growth limits in small villages.	Wootton Rivers Parish Council.
<b>Neighbourhood Plan evidence:</b> Neighbourhood plans should back windfall site allowances with reliable evidence.	Redrow Homes.
<b>Windfall housing policy:</b> Propose a new policy for windfall housing and small sites, including specific figures for each settlement and evidence to support a steady supply.	Amesbury Town Council.
<b>Small site windfall validity:</b> Windfall allowance from small sites is considered a reliable housing supply source for main settlements.	Robert Hitchens.
<b>Salisbury sites 8 and 9</b>	
<b>Addressing transport concerns:</b> Traffic congestion at key locations and insufficient infrastructure improvements are problematic. Increased car usage from new developments could worsen congestion and impact emergency services. Safe routes to schools are lacking, leading to car dependency. Doubts are raised about the claim that new journeys will be car-free without better bus services. Coombe Road safety issues and a funding shortfall for traffic infrastructure improvements are noted.	Individuals x210.

Key issues raised (Policy 2 - Delivery Strategy)	Respondent(s)
<p><b>Prioritising brownfield development:</b> There is strong concern over the neglect of brownfield sites, leading to unnecessary greenfield development. The current housing allocations from brownfield sites are underestimated. The Local Plan is criticised for lacking commitment to sustainable development and adherence to the 2023 Housing Land Supply Statement. Removing Policies 27 and 28 is suggested to improve the plan's soundness.</p>	Individuals x210.
<p><b>Utilising windfall sites:</b> The council is criticised for not considering windfall sites to prevent unnecessary greenfield development. An increase in windfall site allowances is recommended, though this contradicts Salisbury's Neighbourhood Plan. The evidence for new homes from small sites in constrained areas like Salisbury is questioned due to unclear sources and lack of historical data.</p>	Individuals x60.
<p><b>Impact on local services:</b> Development adversely affects local services, notably education, with significant travel issues. Health facilities and emergency service access are also impacted, requiring careful consideration of local service infrastructure in development plans.</p>	Individuals x20.
<p><b>Community engagement shortcomings:</b> The consultation process is deemed inadequate, especially regarding Sites 8 &amp; 9. The lack of engagement is seen as a legal compliance breach. There are calls to rerun the Regulation 18 consultation for Site 8 and address website accessibility issues. Removing Sites 8 &amp; 9 from the plan is proposed to enhance community engagement and ensure legal compliance.</p>	Individuals x240.
<p><b>Developer engagement shortcomings:</b> There is a lack of evidence to demonstrate the Council has engaged with the development industry to establish realistic delivery rates, which has yielded inaccurate expectations.</p>	Bloor Homes (South West).
<p><b>Protecting rural landscapes:</b> Proposed developments may negatively impact Areas of Outstanding Natural Beauty (AONB) and rural character. Reconsideration of these proposals is urged to protect valuable landscapes.</p>	Individuals x30.
<p><b>Neighbourhood plans:</b> Concern that there is no guarantee that neighbourhood plans and their policies will be followed when planning applications are considered.</p>	Cranborne Chase Area of Outstanding Natural Beauty.
<p><b>Respecting the neighbourhood plan:</b> The Local Plan Review is accused of disregarding the Salisbury Neighbourhood Plan. Inconsistencies between Policy 22 and the Neighbourhood Development Plan, especially concerning dwelling designations, call for a revision of Policy 22 to respect the Neighbourhood Plan and consider brownfield sites.</p>	Individuals x40
<p><b>Housing allocation for new community:</b> The Plan lacks housing allocation for the proposed new community north of Salisbury. Clarity and inclusion of housing allocations for this new community are emphasized for balanced development.</p>	Individuals x40.



Key issues raised (Policy 2 - Delivery Strategy)	Respondent(s)
<b>Aligning housing with employment:</b> There is a lack of alignment between employment growth and housing development, leading to unsuitable commuting options and worsening congestion. Focused housing development closer to employment hubs is needed for sustainability.	Individuals x10.
<b>Pre-development infrastructure resolution:</b> Critical infrastructure issues on sites 6 and 8 must be resolved before development to ensure a sustainable living environment.	Individuals x10.
<b>Enhancing affordable housing:</b> The minimal affordable housing expected on Sites 8 and 9 questions Policy 22's effectiveness. The plan's goal of 36,740 new homes may exceed actual need and cater to higher-income buyers, potentially leading to a surplus. Focus should be on social, affordable, and low-cost homes to align with local demand and employment needs.	Individuals x10.
<b>Prioritising community and environment:</b> Concerns are raised about the profit-driven motives behind Site 8's development, potentially at the cost of the local community and environment. Removing Sites 8 & 9 from the Local Plan is recommended to prioritise people and the environment over profit.	Individuals x10.
<b>Salisbury New Community</b>	
<b>New community proposal examination:</b> The new community near Salisbury requires detailed examination to ensure alignment with the overall planning strategy and integrity.	Go South Coast Ltd.
<b>Strategic transport for new community:</b> Concerns about the lack of strategic transport options for the new community highlight the need to consider alternative sites with better connectivity to reduce travel and emissions.	Individuals x10.
<b>Inter-authority collaboration:</b> The proposal lacks cooperation with neighboring authorities like Hampshire. Collaboration is essential for addressing concerns and ensuring a unified development approach.	Individuals x10
<b>Principal Settlements</b>	
<b>Increased housing at Chippenham:</b> A call for a greater housing allocation at Chippenham to avoid reliance on Showell Farm.	David Wilson Homes.
<b>Reduced housing at Chippenham:</b> Concerns about high housing targets for Chippenham and their impact. The Local Planning Authority is urged to review its targets considering CPRE's findings and define "sustainable" development.	Save Chippenham; Individuals x10.
<b>Infrastructure improvements at Trowbridge:</b> Suggestion to prioritise road upgrades and building a secondary school in north Trowbridge, emphasizing comprehensive infrastructure planning over solely meeting housing targets.	Individuals x10.

Key issues raised (Policy 2 - Delivery Strategy)	Respondent(s)
<p><b>Increase housing at Salisbury:</b> Objection to lowering housing rates despite identified needs. Suggestion to increase housing delivery to address affordability and economic concerns.</p>	Vistry Group.
<p><b>Salisbury's housing approach conflicts with NPPF:</b> Conflict with NPPF 2023 regarding Salisbury's use of brownfield land. Suggestion to revise the plan to align with NPPF 2023 and reevaluate housing and commercial land needs.</p>	Salisbury City Council.
<b>Market towns</b>	
<p><b>Concerns about development in Calne:</b> There are worries that development will proceed before the Local Plan is adopted, making it ineffective. The plan doesn't fully consider previous high building rates, environmental constraints, lack of suitable sites, and impacts on traffic and services.</p>	Individuals x10.
<p><b>Insufficient housing growth in Marlborough:</b> Criticism arises due to insufficient housing growth and lack of brownfield land within the settlement boundary. There's a call for more affordable housing and an increased allocation at Barton Dene for homes and employment.</p>	Marlborough College.
<p><b>Housing delivery challenges in Netheravon:</b> Limited land availability hinders housing delivery. Suggestions include utilizing empty MOD properties and the former Coal Yard for affordable housing.</p>	Netherhampton Parish Council.
<p><b>Concerns about development in Amesbury:</b> The Local Plan Review notes possible modest extensions to employment at High Post but proposes no site allocations for Amesbury or High Post. The Council is urged to consider residents' concerns and previous planning experiences.</p>	Individuals x10
<p><b>Development constraints in Bradford on Avon:</b> Draft Policy 2 identifies Bradford on Avon as a "constrained settlement," viewed as overly restrictive and exaggerating development constraints.</p>	European Property Ventures (Wiltshire).
<b>Role and influence of Swindon</b>	
<p><b>Swindon development opportunities:</b> The Local Plan overlooks development opportunities at Swindon's western edge, assuming Swindon can meet its housing needs independently. The 8.3ha Washpool site is a viable alternative for housing.</p>	Persimmon Homes Wessex.
<p><b>Swindon's strategic role:</b> The plan fails to recognise Swindon as a Principal Settlement, indicating a need for a joint housing strategy that considers Swindon's unconstrained development potential.</p>	Thames Valley Chamber of Commerce Group.
<p><b>Cross-boundary collaboration:</b> Cooperation with Swindon Borough Council has diminished, with outdated agreements and less collaboration since adopting the Wiltshire LHNA in 2022. A comprehensive strategy, including development west of Swindon, is needed.</p>	Taylor Wimpey Strategic Land; Hallam Land Management

Key issues raised (Policy 2 - Delivery Strategy)	Respondent(s)
<p><b>Infrastructure coordination:</b> The plan should specify the need for cross-boundary infrastructure, detailing responsibilities and funding sources like the Community Infrastructure Levy (CIL) or Section 106 agreements.</p>	<p>Bloor Homes South West; Woodhouse Developments and Bloor Homes.</p>
<p><b>Role of rural areas and lower-order settlements</b></p>	
<p><b>Concerns about rural housing distribution:</b> The current approach to rural housing distribution is flawed, leading to over-supply or reduced requirements. There's a lack of clarity in rural housing strategies, risking no further development in villages. It is suggested that rural settlements should exceed minimum requirements where possible.</p>	<p>Persimmon Homes Wessex.</p>
<p><b>Housing provision in Steeple Ashton:</b> There is insufficient housing in Steeple Ashton, with criticism of reduced housing need in Trowbridge HMA. Increasing overall housing requirements and boosting Trowbridge HMA housing, particularly at sites like Edington Road in Steeple Ashton, is recommended.</p>	<p>Newland Homes.</p>
<p><b>Overemphasis on rural development:</b> Excessive rural development neglects Principal Settlements' growth potential. A focus on Principal Settlements and Market Towns is suggested.</p>	<p>Bloor Homes South West; RWB Town Council; Hannick Homes.</p>
<p><b>Neglect of rural areas in Plan:</b> The plan overly focuses on main settlements, neglecting rural areas by restricting development beyond settlement boundaries. Broader infill restrictions, supportive reuse policies for unsustainable sites, and a balanced housing distribution are recommended. Emphasis on windfall and small sites and more permissive community-led development policies in Small Villages are suggested.</p>	<p>Taylor Wimpey Strategic Land; Cotswolds Ecohomes; Urchfont LVA LLP; Main Square (Brinkworth) Ltd; Redcliff Homes; Society of Merchant Venturers; Acorn Construction (Newbury) Ltd; NJL Consulting; PrimeTower Properties; The Huggett Family; Master Land &amp; Planning; Gleeson Land; Waddeton Park, and Robert Hitchens, and Individuals x10.</p>
<p><b>Unmet housing need in New Forest Park:</b> The plan lacks a quantified figure for unmet housing need in New Forest Park. Further investigation is suggested, with no objections to policies supporting small-scale rural exception site development in Salisbury and Salisbury Rural areas.</p>	<p>New Forest National Park Authority.</p>
<p><b>Growth support in Local Service Centres and Large Villages:</b> More growth in Local Service Centres and Large Villages is suggested. Pewsey's growth potential to support the regional economy and alleviate housing pressure is highlighted. Clear land allocation for residential development in Pewsey and higher growth in Shrewton, Ramsbury, Semington, and Dilton Marsh is recommended.</p>	<p>Gleeson Land; St Philips Land Ltd; European Property Ventures (Wiltshire); Messrs Gorrings, Bennett and Marks; Cala Homes, and Dilton Marsh LVA LLP.</p>
<p><b>Village identity and neighbourhood plan conflicts:</b> Concerns about allocations affecting village identities and conflicts with neighbourhood plans are noted, particularly for Hilperton, North Bradley, Southwick, and Potterne. Lack of consultation in Potterne raises conflicts with its neighbourhood plan.</p>	<p>North Bradley Parish Council; Southwick Parish Council; Potterne Parish Council, and Individuals x10.</p>

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<b>Misclassification of rural settlements:</b> Some rural settlements are misclassified. Laverstock should be removed from Policy 30 as a 'Small Village,' and Lyneham should be reclassified from a Large Village to a Local Service Centre.	Barratt Bristol, and Individuals x10.
<b>New strategy for Large Villages:</b> The Local Plan introduces a “presumption for development” in Large Villages, removing previous restrictions. Consider the impact on local services and facilities, such as electricity and water supply.	Individuals x10.
<b>Role of brownfield land</b>	
<b>Brownfield site utilization:</b> The plan lacks emphasis on using brownfield sites in Melksham and Devizes. Prioritise these over greenfield sites to benefit villages like Worton and guide future development.	Rushall Parish Council.
<b>Brownfield vs. Greenfield development:</b> The plan should prioritise brownfield sites over greenfield to ensure sustainable planning.	Go South Coast Ltd.
<b>Green space preservation:</b> Prioritise brownfield site development to protect community green spaces.	Cheverell Magna Parish Council.
<b>Brownfield area exploration:</b> The plan minimally uses brownfield areas. Explore and utilize these areas more extensively for housing, such as the White Horse estate.	Individuals x10
<b>Greenfield development pause:</b> Halt all greenfield development until brownfield sites are fully utilized.	Individuals x10
<b>Brownfield site priority:</b> Prioritise brownfield sites to maintain a coherent housing strategy, as seen at Quidhampton Quarry Sites.	Quidhampton Developments; Individuals x10.
<b>Settlement Boundaries</b>	
<b>Updating settlement boundaries:</b> The plan lacks mechanisms for regular reviews of settlement boundaries, needed for timely development and plan flexibility.	Marlborough College; RWB Town Council; Durmast Ltd, and Individuals x10
<b>Definition and boundaries of Small Villages:</b> Clarify the definition and boundaries of Small Villages, amend policy to support infill development, and define settlement boundaries and criteria.	Main Square (Brinkworth) Ltd; Melksham Without Parish Council.
<b>Edge of settlement development:</b> Clarify the process for development outside settlement boundaries. Expand boundaries to include land with planning permission and support delivery sites adjoining settlement boundaries.	White Lion Land LLP; David Wilson Homes; Society of Merchant Venturers; Acorn Construction (Newbury) Ltd; Neston Park Estate; Hallam Land Management.
<b>Infrastructure (and development constraints)</b>	

Key issues raised (Policy 2 - Delivery Strategy)	Respondent(s)
<b>Infrastructure coordination clarity:</b> Address uncertainty in identifying and coordinating infrastructure for developments, defining processes clearly to tackle risks tied to large infrastructure-dependent allocations.	Go South Coast Ltd.
<b>Controlled care home development:</b> Oppose unrestricted care home construction on greenfield sites, advocating for controlled development and local business occupation through appropriate regulations.	Individuals x10.
<b>High Street revitalisation:</b> Emphasize revitalising high streets, improving local amenities, and refurbishing neglected properties to fill vacant shops and enhance community services.	Individuals x10.
<b>Sustainable travel integration:</b> Ensure new developments are well-connected with public transport networks to promote sustainable travel.	Go South Coast Ltd.
<b>Bath travel management:</b> Support managing travel into Bath from the east, including reopening Corsham Station and new road projects, to reduce congestion and promote sustainable travel.	Bath and North East Somerset Council.
<b>Traffic management in large towns:</b> Implement strategies to manage increasing traffic in large towns and principal settlements effectively.	Individuals x10
<b>A350 strategic recognition:</b> Recognise the A350's key role in the strategic road network for freight movement and advocate for its reclassification in transport planning.	Individuals x10
<b>Renewable energy and transport infrastructure:</b> Enhance sustainable transport infrastructure and adopt comprehensive renewable energy policies.	Chippenham Town Council; Go South Coast Ltd.
<b>Transport policy revision:</b> Revise existing transport policy to address current and future needs.	Individuals x10
<b>Development impact concerns:</b> Address concerns about the effects of large-scale developments on traffic, green spaces, and cycleways. Housing numbers should not be influenced by distributor road grant applications.	Individuals x10.
<b>Maximize public transport:</b> Increase public transport usage by working with providers to establish strategic corridors, nodes, and routes for high-quality service and connectivity.	Go South Coast Ltd.
<b>Flood Zone development precautions:</b> Follow the Strategic Flood Risk Assessment's recommendation to restrict development in Flood Zone 3, similar to Flood Zone 3b, allowing only essential infrastructure.	Tisbury Parish Council.
<b>Minerals and Waste Development</b>	
<b>Waste management infrastructure:</b> Address the lack of waste management infrastructure in housing developments.	The Hills Groups Ltd.

Key issues raised (Policy 2 - Delivery Strategy)	Respondent(s)
<b>Sand and gravel reserves:</b> Tackle concerns over low sand and gravel reserves, which impact sustainability due to the need for importation.	The Hills Groups Ltd.
<b>Coordination with minerals and waste strategies:</b> Improve coordination between the Plan and minerals and waste strategies by including a policy on minerals and waste safeguarding.	The Hills Groups Ltd.
<b>Historic Environment</b>	
<b>Area of Search and historic environment:</b> Revise the Area of Search to avoid encroaching on the historic environment, aligning with the aspiration to conserve and enhance it.	National Trust.
<b>Encroachment on World Heritage Sites:</b> Avoid encroachment on the setting of the Stonehenge, Avebury, and Associated Sites WHS by utilizing findings from the upcoming WHS Setting Study.	National Trust.
<b>Landscape</b>	
<b>Rare Chalkland Grassland in South Wiltshire:</b> Prioritise ecological importance when searching for a new settlement location to protect nationally significant chalkland grassland.	National Trust.
<b>Contradictions in the Plan for Marlborough:</b> Address the contradiction of recognising Marlborough's AONB constraints while proposing substantial developments. Properly assess environmental impacts, road access, and visual aesthetics under Policy 46.	Individuals x10
<b>Recognition of AONB settlements:</b> Adopt a landscape-led approach to development planning in AONB settlements like Marlborough and Pewsey, emphasizing preservation and enhancement of unique landscapes.	North Wessex Downs AONB.
<b>Biodiversity</b>	
<b>Biodiversity and environmental conservation:</b> Support environmental and wildlife conservation, focusing on water management, landscape protection, and climate change adaptation strategies. Align terminology with "National Landscapes" and enhance environmental protections in the Sustainability Appraisal.	Natural England.
<b>Environment:</b> This part of the Local Plan should prioritise the preservation of the environment upfront, ensuring this influences the strategies and allocation numbers.	Cranborne Chase Area of Outstanding Natural Beauty
<b>Climate Change</b>	
<b>Climate Change mitigation and adaptation:</b> Rewrite the Plan to comply with climate change mitigation and adaptation guidelines, focusing on reducing emissions and promoting sustainability.	Chippenham Town Council; Individuals x10
<b>Figure 3.1</b>	

Key issues raised (Policy 2 - Delivery Strategy)	Respondent(s)
<b>Clarification on New Forest National Park Area:</b> Clarify the shaded area within New Forest National Park on Figure 3.1, as it is not within Wiltshire Council's planning remit.	New Forest National Park Authority.
<b>Inclusion of Bedwyn Station:</b> Amend Figure 3.1 to include Bedwyn station by name for accurate representation of transportation infrastructure.	Individuals x10.
<b>Figure 3.2</b>	
<b>Inclusion of canals on map:</b> Show Kennet & Avon Canal and Wilts and Berks Canal on Figure 3.2 and add 'canal and towpath' to the map key to highlight their importance in the green and blue infrastructure network.	Wiltshire Climate Alliance.
<b>Inclusion of National Cycle Routes:</b> Include National Cycle Routes, such as NCN4 and NCN 403, on the map and key for their strategic importance. Address their omission in the Duty to Cooperate Statement.	Wiltshire Climate Alliance.
<b>Indications of road or rail improvements:</b> Incorporate road and rail service improvements, including new stations, into the strategic transport plan.	Individuals x10
<b>Role of neighbourhood planning</b>	
<b>Neighbourhood plans and housing supply:</b> Neighbourhood plans are important but relying on unpermitted sites risks housing supply.	Bloor Homes SouthWest; Persimmon Homes (Wessex), and Thames Valley Chamber of Commerce Group.
<b>Clear policy mechanism:</b> Plans ending in 2026 need a clear policy mechanism if not progressing as planned.	Bloor Homes SouthWest, and Persimmon Homes (Wessex).
<b>Specific site allocations over reliance on neighbourhood plans:</b> Propose specific site allocations like Site 582 at Upavon instead of relying on neighbourhood plans.	Kitewood Estates Ltd.
<b>Reducing reliance on neighbourhood plans for housing delivery:</b> Remove reliance on neighbourhood plans for housing numbers, using alternative methods to meet the Council's housing needs due to uncertainties.	Bellway Homes.
<b>Government intervention and green spaces:</b> Prevent government overruling local planning, protect green spaces, and adhere to local plans developed with community input.	Cheverell Magna Parish Council.
<b>Practical recommendations for rural housing:</b> Align recommendations with Neighbourhood Plans and village characteristics to address infrastructure and sustainability concerns.	Individuals x10
<b>Extending neighbourhood plan effectiveness:</b> Extend neighbourhood plan effectiveness beyond two years for stability and recognition of volunteer efforts.	Individuals x10

Key issues raised (Policy 2 - Delivery Strategy)	Respondent(s)
<b>Enhancing Local Plan support for neighbourhood plans:</b> Introduce a policy to support Neighbourhood Plans, detailing aims, content, and support mechanisms.	Wiltshire Community Land Trust.
<b>Guidelines for neighbourhood plan roles and priorities:</b> Provide clear guidelines on Neighbourhood Plan roles and priorities for volunteers in Wiltshire's towns and villages.	Wiltshire Community Land Trust.
<b>Medium to smaller site allocation in rural areas:</b> Allocate more medium to smaller sites in rural areas and clarify mechanisms for rural growth.	NJL Consulting; The Crown Estate; Land Value Alliances; Castlewood Venture Partnerships; St Philips Land Ltd; Woodhouse Developments and Bloor Homes; Bloor Homes South West; Urchfont LVA LLP.
<b>Removing arbitrary site size limits and addressing reliance on windfalls:</b> Remove site size limits in neighbourhood plans for efficient housing delivery and clarify their role regarding windfalls.	David Wilson Homes; Land Value Alliances; Castlewood Venture Partnerships; St Philips Land Ltd; Woodhouse Developments and Bloor Homes; Bloor Homes South West; Urchfont LVA LLP.
<b>Strategic direction and neighbourhood plans:</b> Emphasize aligning Neighbourhood Plans with the Local Plan to meet housing needs and accommodate specific community needs.	Master Land & Planning; Neston Park Estate.
<b>Clarifying housing requirements and roles:</b> Clarify Policy 2 to outline housing requirements for Principal Settlements, Market Towns, Local Service Centres, and Large Villages, applying to entire neighbourhood areas.	Melksham Without Parish Council; Melksham Town Council.
<b>Object to additional housing allocations through neighbourhood plans:</b> Object to Policy 2's mention of additional housing allocations through neighbourhood plans and site allocation documents.	Go South Coast Ltd.
<b>Reliance on neighbourhood plans and guidance:</b> Provide clearer guidance and support for Neighbourhood Plan development.	European Property Ventures (Wiltshire).
<b>Reducing reliance on neighbourhood plans for housing supply:</b> Reduce reliance on neighbourhood plans for housing supply and develop support mechanisms for their timely preparation and delivery.	Redrow Homes.
<b>Ramsbury's growth and non-existent neighbourhood plans:</b> Address the lack of provisions for Ramsbury's growth in the Housing Delivery Strategy due to non-existent Neighbourhood Plans.	Messrs Gorringe; Bennett and Marks.
<b>Role of neighbourhood plans in rural areas:</b> Clarify the role of Neighbourhood Plans in rural housing supply and devise delivery strategies.	Barratt Homes Group.



Key issues raised (Policy 2 - Delivery Strategy)	Respondent(s)
<b>Strategy for housing allocation:</b> Support using Neighbourhood Plans for development locations with mechanisms for monitoring and review.	Cala Homes.
<b>Policy modification for neighbourhood planning:</b> Modify policy to allocate housing requirements for all designated neighbourhood areas and provide evidence for Neighbourhood Plans.	Mac Mic Group.
<b>Compliance with NPPF and Plan modification:</b> Ensure strategic policies outline housing requirements for neighbourhood areas per NPPF guidelines and correct Policy 2's references for accurate housing growth levels.	Robert Hitchens.
<b>Clarity and reliance in housing allocation:</b> Implement a policy ensuring Neighbourhood Plans allocate sufficient housing sites and provide clear housing allocation direction in designated areas.	Dilton Marsh LVA LLP.
<b>Uncertainty in neighbourhood plan allowance:</b> Address uncertainties by introducing policies to ensure housing delivery through Neighbourhood Plans or other means, considering past performance.	Robert Hitchens.
<b>Alignment between housing and employment strategies</b>	
<b>Local Plan objectives Alignment:</b> The proposed housing and employment growth may not align with the Plan's objectives for economic growth, housing provision, and infrastructure development.	Gleeson Land.
<b>Housing strategy alignment:</b> The proposed housing approach may inadequately support forecasted job growth, with concerns that the housing target is too low to align with employment projections and aspirations.	Presscredit (Rudloe) Ltd; Persimmon Homes (South Coast) Ltd; Gladman Land; Dilton Marsh LVA LLP; Redcliff Homes; Land Value Alliances; Castlewood Venture Partnerships; Woodhouse Developments and Bloor Homes; Urchfont LVA LLP; Rosconn Strategic Land; Hannick Homes; Great Tew Bantham Estates.
<b>Employment demand</b>	
<b>Growth scenario exceedance:</b> The plan's employment land demand exceeds the highest growth scenarios, while housing provision is based on minimum requirements, not higher growth ambitions.	Gleeson Land.
<b>Economic growth factors:</b> Economic growth factors should inform housing requirements.	Miller Homes.
<b>Employment land requirements:</b> The plan lacks emphasis on economic growth and sufficient employment land allocations to meet forecasted needs over the Plan period.	St Modwen Logistics; Quidhampton Developments Ltd; Spitfire Enterprises Ltd; Society of Merchant Venturers.

Key issues raised (Policy 2 - Delivery Strategy)	Respondent(s)
<b>Castledown Business Park demand:</b> There are doubts about the need for additional employment land at Castledown Business Park due to weak demand and potential high upgrade costs.	Property Alliance Group Ltd.
<b>Employment demand unmet:</b> The forecasted employment demand, especially under higher growth scenarios, is unmet, indicating shortages in Salisbury HMA and Wiltshire. Sufficient employment allocations are needed.	Spitfire Enterprises Ltd.
<b>Rural employment policy discrepancies:</b> There are concerns about policy inconsistencies regarding rural employment, necessitating a clear framework for rural employment development.	Conlon Ltd.
<b>Large Villages employment growth:</b> The Plan lacks guidance on appropriate employment growth in Large Villages like Hullavington.	Barratt David Wilson Homes.
<b>Employment land allocations:</b> There are discrepancies between proposed employment land allocations and the settlement hierarchy.	Property Alliance Group Ltd.
<b>Marlborough allocation:</b> Policy 46's allocation of housing and employment land in constrained Marlborough contradicts the principle of minimizing allocations in such areas.	Individuals x10
<b>Calne Spatial Strategy:</b> Calne's Spatial Strategy is overly constrained, with insufficient assessment of growth benefits and discrepancies in growth rates compared to places like Melksham.	Persimmon Homes Wessex.
<b>Employment supply</b>	
<b>Employment land provision:</b> The Local Plan provides insufficient employment land, needing between 160 ha and 206 ha as per the Employment Land Review (ELR).	Property Alliance Group Ltd.
<b>Policy 2 clarity:</b> Clarity is needed in Policy 2, with a dynamic approach to employment land provision that aligns with national policies.	St Modwen Logistics; St Modwen Logistics; The Sealy Family Trust; Waddeton Park Ltd; Conlon Ltd.
<b>Policy 2 revision:</b> Revise Policy 2 to prioritise housing over employment land release, following NPPF guidelines on land use.	Robert Hitchens.
<b>Planning application restrictions:</b> Restrict planning applications where employment allocations are not fully utilized.	Peter Curtis.
<b>Mixed-use site assumptions:</b> Concerns exist about assuming mixed-use sites are suitable for employment without considering barriers like proximity to residences and accessibility.	Gleeson Land.

Key issues raised (Policy 2 - Delivery Strategy)	Respondent(s)
<b>Intensification criteria:</b> Clarify criteria for intensification and renewal of Principal Employment Areas and employment development near Principal Settlements and Market Towns.	Corsham Town Council.
<b>Amesbury growth:</b> The plan lacks adequate employment land allocation for Amesbury, despite its potential for significant growth.	Classmaxi Limited; Lincoln College Oxford.
<b>Cricklade employment allocations:</b> There is a lack of employment allocations in Cricklade.	Conlon Ltd.
<b>Employment land distribution:</b> Concerns about the distribution of employment land, particularly impractical sites in the Salisbury area, including the New Community and Tidworth/Ludgershall.	Property Alliance Group Ltd.
<b>Housing distribution concerns:</b> Issues with housing distribution across HMAs, changes in strategy for Chippenham HMA, and concerns about affordability.	L&Q Estates.
<b>Planning policy flexibility:</b> Planning policies need flexibility to adapt to changing economic conditions and specific sector requirements.	St Modwen Logistics.
<b>Flexible approach proposal:</b> Propose a flexible approach to delivering additional employment space, mainly on the outskirts of existing settlements and main identified settlements.	Bath and North East Somerset Council.
<b>Policy 65 ambiguity:</b> Clarify Policy 65 regarding the release of employment land and remove Council involvement in site marketing and land appropriation.	Barratt Homes and Vistry; Barratt Homes Group; Marlborough College.
<b>Existing allocations deliverability:</b> Concerns exist about the deliverability and suitability of existing allocations due to high costs, unsuitability for industrial use, and landowner reluctance to develop.	Society of Merchant Venturers.
<b>Employment land release prioritisation:</b> The policy prioritises releasing employment land, risking under-delivery and compromising Plan objectives.	Society of Merchant Venturers.
<b>Previously developed land prioritisation:</b> Policy 2's focus on previously developed land, including former employment sites, may lead to high-density developments with less affordable housing due to viability issues.	European Property Ventures (Wiltshire).
<b>Brownfield sites redevelopment:</b> Include a policy to support redeveloping brownfield sites in the countryside that are well-connected to existing settlements.	Individuals x10
<b>Previously developed land re-use:</b> Prioritise the re-use of previously developed land.	Society of Merchant Venturers.
<b>Strategic Logistics</b>	
<b>Logistics employment requirements:</b> Policy 2 lacks clear quantification of employment needs for logistics. The Plan should establish the need and allocate suitable sites.	GLP.

Key issues raised (Policy 2 - Delivery Strategy)	Respondent(s)
<b>Strategic distribution demand:</b> Consider additional demand for strategic distribution and logistics floorspace.	Great Tew Bantham Estates.
<b>Phase 3 land importance:</b> Phase 3 land is crucial for strategic logistics employment, expanding St Modwen Park Chippenham (SMPC) within the Plan period.	St Modwen Logistics.
<b>B8 logistics demand:</b> More consideration is needed for national and regional B8 logistics and distribution demand, especially along the M4 corridor.	St Modwen Logistics.
<b>Strategic locations growth:</b> Allocate sites at strategic locations like Junction 17 for further growth instead of relying on developers to secure planning permissions.	St Modwen Logistics.
<b>Economic evidence concerns:</b> There are concerns about the economic evidence underpinning the plan, especially regarding market demand for industrial and logistics uses.	St Modwen Logistics.
<b>Employment Land Review</b>	
<b>Demand calculation:</b> The ELR underestimates new employment land needs due to methodological weaknesses. Savills recommends 188-211ha of industrial and logistics land over 18 years based on market trends.	St Modwen Logistics.
<b>Existing sites demand:</b> The assumption that 20% of demand can be met on existing sites is unrealistic due to limited development potential, with only one site identified as viable.	St Modwen Logistics.
<b>Strategic B8 uses:</b> The 23ha figure for strategic B8 uses lacks analysis and evidence. The Sustainability Appraisal relies on outdated data and fails to consider strategic logistics or assess suitable employment development locations.	St Modwen Logistics.
<b>Employment forecasts alignment:</b> Employment forecasts should extend to a longer Plan period to avoid underestimating future job growth and ensuring sufficient housing provision.	St Modwen Logistics; Persimmon Homes (South Coast) Ltd; Gladman.
<b>Economic forecasts variation:</b> The ELR/LHNA projects 21,300 job growth between 2020 and 2038 by averaging wide variations in economic forecasts.	Metis Homes.
<b>Higher growth scenario adoption:</b> The LHNA considers only the 'central' scenario, overlooking other growth factors. Re-assessment suggests a 147ha employment land requirement under Scenario 2a, less than Policy 2 proposes.	Great Tew Bantham Estates.
<b>ELR conservatism:</b> The ELR is conservative, influenced by trends like remote working due to COVID-19, and should adopt a more optimistic view of employment growth.	Redcliff Homes; Individuals x10.

Key issues raised (Policy 2 - Delivery Strategy)	Respondent(s)
<b>ELR uncertainty:</b> The ELR shows conflicting forecasts without firm recommendations, indicating uncertainty in future employment growth.	Redcliffe Homes; Individuals x10.
<b>Other comments</b>	
<b>Direct engagement with communities:</b> Planners should visit villages and towns to understand local issues and concerns firsthand.	Cheverell Magna Parish Council.
<b>Transparency in consultation process:</b> Improve the consultation process by providing access to evidence, enabling communities to comment effectively on proposed developments.	Individuals x10.
<b>Vigilance against self-serving practices:</b> Residents should remain vigilant against self-serving councillors and developers, advocating for community involvement in decision-making.	Individuals x10.
<b>Commenting in specific document section:</b> An option is needed for commenting between paragraph 4.209 and paragraph 4.214.	Tisbury Parish Council.
<b>Unrealistic plan timetable:</b> The Local Development Scheme timeline is unrealistic, with Local Plans typically taking 7 years to produce and examination periods lasting about a year.	De Vernon Trustees; Robert Hitchens.
<b>Complexity of online portal:</b> Simplify the online portal for easier use.	Individuals x10.
<b>Planning applications and committee reform:</b> Refuse applications with errors and misleading information, and reform the Strategic Planning Committee.	Individuals x10.
<b>Lack of implementation evidence:</b> The plan lacks concrete strategies for achieving objectives, leading to uncertainties and high commuting rates.	Individuals x10.
<b>Utilization of ONS data:</b> Use ONS data to model demographic changes and determine the need for smaller properties and family homes.	Pewsey Green.
<b>Complexity of paragraph 3.47:</b> Rewrite paragraph 3.47 to simplify language and improve readability.	Individuals x10.
<b>Consultation process criticism:</b> There is criticism of the consultation process for the Economic Land Availability Assessment (and Rural Housing Paper) due to withheld evidence, making it difficult for communities to provide satisfactory comments.	Individuals x10.
<b>Absence of definitive plans:</b> The absence of a definitive Economic Development Plan (and Transport Plan) impacts the soundness of the policies outlined in the Local Plan.	Individuals x10.

**Table 5.12 [Policy 3 - Reserve sites for housing and broad locations for growth] key issues**

Key issues raised (Policy 3 - Reserve sites for housing and broad locations for growth)	Respondent(s)
<b>Plans and evidence base</b>	
<b>Assessment and identification:</b> It is noted that these locations will be assessed and identified through policies within a subsequent development plan document.	Natural England.
<b>Lack of clear triggers and housing monitoring:</b> There is concern about the absence of a clear trigger to address any housing supply shortfall. It is suggested that housing monitoring should be undertaken both county-wide and on an area-by-area basis to effectively track and manage housing supply.	HBF; Robert Hitchens Ltd; Bellway Homes; Go South Coast Ltd; L&Q Estates.
<b>Policy issues:</b> Policy 3 is considered unsound, ineffective, unjustified, and inconsistent with national policy. There is a recommendation to amend Bullet Point 3 of Policy 3 to change the word "credible" to "effective community engagement" in accordance with the NPPF. Additionally, it is suggested to delete the wording from Paragraphs 3.47 and 3.48, as no evidence supports restricting the size of sites to small and medium sites in Neighbourhood Plans, aligning with NPPF Paragraph 29.	Chippenham Riverside (Formerly Chipppenham 2020 LLP)]; Barratt Homes (Bristol); Kier Group; Taylor Wimpey Strategic Land; Hilperton Parish Council; Trowbridge Town Council; Society of Merchant Venturers.
<b>Sustainability Appraisal (SA):</b> The Sustainability Appraisal process is criticised for lacking thoroughness. It is suggested that the West of Swindon option, which is only lightly developed in the latest SA version and contains limited details, should be more thoroughly evaluated at a strategic level. There is also a call to consider new settlements within the SA, balanced against other preferred strategic growth options. Concerns are raised about SA Paragraph 6.5, which proposes Trowbridge as one of three broad locations for growth, enabling significant urban extensions that do not respect the individual identities of villages, particularly in conjunction with Policy 52. Furthermore, it is noted that the SA has not considered all reasonable alternatives, especially the potential for increased growth at Bradford on Avon and Trowbridge.	Swindon Borough Council; Southwick Parish Council; Cala Homes (Thames) Ltd.
<b>Support further sustainable development</b>	
<b>Edge of settlement sites:</b> Reword Policy 3 to emphasize the potential of greenfield sites at the edge of settlements. These sites can deliver both market and affordable housing, especially if there's a shortage of housing land supply over a 5-year period.	Land Value Alliances LLP (LVA); J Huggett, R Huggett; Q Huggett; S Huggett; Heirs Stuart Huggett; Kington Farms Ltd.
<b>Presumption in favour of sustainable development:</b> Introduce a presumption in favour of sustainable development. By incorporating this into Policy 2 and revising Policy 3, proposals within a particular Housing Market Area (HMA) would receive favourable consideration.	Robert Hitchens Ltd; Bellway Homes.
<b>Deliverability:</b> Need for clarity on developable areas within the plan period. A more detailed policy, including specific site allocations, would better support housing and economic growth.	Swindon Borough Council.

Key issues raised (Policy 3 - Reserve sites for housing and broad locations for growth)	Respondent(s)
<p><b>Housing requirement and land supply:</b> Existing policy is unjustified and unsound. Support higher housing requirement and a realistic land supply. Site allocations are crucial for ensuring growth.</p>	<p>Great Tew Bantham Estates LLP; Hill Residential Ltd; Bloor Homes South West; Barratt David Wilson (Land at Hullavington); Bloor Homes South West (Melksham); Rosconn Strategic Land Ltd; Hannick Homes and Developments Ltd; Bloor Homes South West (Land to the SW of A3102, Melksham); Robert Hitchens Ltd; Welbeck Strategic Land II LLP; Vistry Group; Go South Coast Ltd; Cala Homes (Thames) Ltd; L&amp;Q Estates; Waddeton Park; Terra Strategic Land Ltd.</p>
<p><b>Reserve sites</b></p>	
<p><b>Effectiveness and sufficiency of reserve sites:</b> Policy 3 is deemed ineffective because the number of dwellings from the three reserve sites is insufficient to meet housing needs or provide an effective contingency. Reserve sites currently account for only about 1% of the overall housing requirement, but to ensure a robust buffer and maintain a 5-year land supply, they should constitute at least 10%. Additionally, the existing list of reserve sites is considered inadequate for providing realistic contingency and supporting community priorities.</p>	<p>TOF Corporate Trustees Ltd; Bellway Homes; SW Housing Association Consortium; Castlewood Commercial Properties; Hills Homes; Barwood Land (Planning Executive); Hannick Homes and Developments Ltd; Hallam Land Management; Persimmon Homes Wessex and Persimmon Homes South Coast; Society of Merchant Venturers; Bloor Homes South West Ltd; Quidhampton Developments Ltd; Rosconn Strategic Land Ltd; Individuals x10.</p>
<p><b>Allocation of reserve sites:</b> Some comments suggest that reserve sites in constrained settlements should be fully allocated to address housing shortfalls, while others propose removing reserve sites altogether in favour of additional site allocations. It is advised to allocate sufficient land first and then identify further reserve sites sequentially. There are calls to delete Policy 3 and allocate reserve sites to increase overall housing supply and reduce the Salisbury HMA requirement. Furthermore, the process for identifying reserve sites should consider all options for sustainable development, not just those on the edge of settlement boundaries, and additional reserve sites should meet needs in neighbouring HMAs, such as Lay Wood in Devizes.</p>	<p>Cala Homes (Thames) Ltd; Welbeck Strategic Land LLP; White Horse County Club Ltd; Persimmon Homes Wessex &amp; Persimmon Homes South Coast; Barratt Homes (Bristol); Harnham Housing Steering Group; Society of Merchant Venturers, and The Crown Estate.</p>
<p><b>Planning and delivery issues:</b> The policy assumes planning applications for reserve sites, and without these applications, the policy is ineffective. There is criticism that reserve sites are pseudo allocations, misleadingly included in housing supply calculations. It is suggested that reserve sites should only be activated if proposed</p>	<p>Robert Hitchens Ltd; HBF; Bloor Homes South West; Taylor Wimpey Strategic Land; Great Tew Bantham Estates LLP; The Crown Estate.</p>

Key issues raised (Policy 3 - Reserve sites for housing and broad locations for growth)	Respondent(s)
<p>allocations underperform, with a contingency of 10% of the housing requirement. If reserve sites are included in the housing supply, they should be released as needed, not restricted by policy provisions. Additionally, inconsistency arises as reserve sites are included in the total supply but not in the housing trajectory.</p>	
<p><b>Spatial distribution and suitability of reserve sites:</b> It is suggested that there should be at least one or two reserve sites in each of the four housing market areas to add to the existing housing supply. Reserve sites should be identified in Principal Settlements and Market Towns, where housing delivery risks are highest. There is a recommendation to focus on less constrained settlements with potential development capacity, such as Warminster, to address housing shortfalls. The impracticality and unrealism of adding sites in locations like Large Villages, e.g., Worton, are noted, and the appropriateness of reserve sites in constrained settlements like Bradford-on-Avon, Corsham, and Malmesbury is questioned. Additionally, while reserve sites are shown on the policies map, they lack specific policies and are in constrained settlements, and some reserve sites are not identified on the map at all.</p>	<p>HBF; Barwood Land; Bloor Homes South West; Hannick Homes and Developments Ltd; Rushall Parish Council; Rosconn Strategic Land Ltd; Presscredit (Rudloe) Ltd; Redrow Homes; Welbeck Strategic Land II LLP.</p>
<p><b>Lack of evidence and clarity:</b> There is no evidence provided on how reserve sites fit into the overall housing hierarchy, and there is specific concern over the absence of a reserve site in the Salisbury HMA.</p>	<p>Bellway Homes; L&amp;Q Estates; Bloor Homes South West.</p>
<p><b>Objections to Corsham Reserve Site:</b> There is a clear objection to including Corsham as a constrained settlement in Table 3.2, as well as a specific objection to the proposed reserve site in Corsham.</p>	<p>Great Tew Bantham Estates LLP; Corsham Town Council.</p>
<p><b>Analysis and rationale for Corsham Reserve Site:</b> One concern is that the Corsham reserve site is larger than the proposed allocation, with no explanation of how it supports place-shaping priorities. There is also objection to the exclusion of brownfield sites, including former MOD sites, from development consideration, questioning why a large greenfield site in a constrained settlement like Corsham is preferred despite available brownfield alternatives. Furthermore, despite ongoing engagement, the Council has not considered development opportunities at Azimnghur Barracks and Colerne Airfield as reserve site options or broad locations for growth.</p>	<p>Bloor Homes South West; Presscredit(Rudloe)Ltd; Persimmon Homes Wessex; Persimmon Homes South Coast; Defence Infrastructure Organisation.</p>
<p><b>Qualified support for Corsham Reserve Site:</b> There is conditional support for the Corsham reserve site, contingent upon allocating more sites, including reserve sites, to meet housing needs. Additionally, there is a call to maximize the allocation of more houses in market towns like Corsham and to provide sufficient employment land to support this growth.</p>	<p>De Vernon Trustees; Kier Group Ltd.</p>
<p><b>Objections to Bradford on Avon Reserve Site:</b> Objections to the Bradford on Avon reserve site argue that it is not an appropriate tool to deliver housing land in the town, as there are no allocations and the plan relies heavily on windfall and neighbourhood plan sites, which fall short of the required 140 homes. Additionally, the identified reserve site is unlikely to be triggered for release as it depends on a larger under provision across the housing market area (HMA) and the county. There is also a general objection to the reserve site. The value</p>	<p>Vistry Group; Waddeton Park Ltd; Bradford on Avon Town Council; and Individuals x10.</p>



Key issues raised (Policy 3 - Reserve sites for housing and broad locations for growth)	Respondent(s)
<p>of open space and wildlife is highlighted with the comment that the area in question is a much-valued open space and an important wildlife haven. The former golf course site is specifically noted as unworthy of inclusion due to past planning application refusals in 2008.</p>	
<p><b>Objections to Malmesbury Reserve Site:</b> Objections to the Malmesbury Reserve Site argue that Malmesbury is not the right location for further housing due to already completed and pending housing projects. Critics disagree with the Planning for Malmesbury Table 7 assessment, suggesting that a site with better access to the A419 should be chosen instead.</p>	Malmesbury Town Council.
<p><b>Broad locations of growth</b></p>	
<p><b>Conditional support for Broad Locations of Growth:</b> Support for broad locations of growth is expressed in principle, but there is a clear emphasis on the need for sufficient certainty that these areas will deliver over the plan period. This conditional support hinges on the assurance that the proposed developments will indeed meet their targets.</p>	Rosconn Strategic Land Ltd.
<p><b>Lack of explanation and clarity:</b> Comments highlight a significant lack of explanation and clarity regarding the broad locations of growth, noting that these areas are not adequately explained or depicted on Figure 3.1. Additionally, there is a concern about the lack of certainty and justification for the location and scale of additional urban extensions, which undermines confidence that housing and employment needs will be met later in the plan period.</p>	Persimmon Homes Wessex; Persimmon Homes South Coast; Land Value Alliances LLP (LVA); Bloor Homes South West Ltd.
<p><b>Need for specific allocations and long-term planning:</b> There is a strong call for allocating specific sites within the broad locations of growth and the area of search to support long-term planning for growth and infrastructure. Some comments suggest replacing broad locations of growth with additional specific sites to deliver the required housing and jobs over the plan period. The current approach is criticised for being vague and lacking substantive justification, which could lead to an ineffective plan. Including small sites in the early part of the plan period is also recommended.</p>	Bloor Homes South West Ltd; Baker Estates Ltd; Hallam Land Management.
<p><b>Concerns about delivery and timescales:</b> Concerns about delivery and timescales focus on the anticipated decline in delivery rates from 2031/32, highlighting the need for broad locations of growth to come forward at that time. However, the Local Plan's proposal to identify these areas in a future DPD is seen as problematic due to unrealistic timescales and conflicts in the wording of Policy 2, Policy 3, and Paragraph 3.54. The current timeline, which is unlikely to conclude until Quarter 2 of 2026, is deemed unjustified, ineffective, and unsound, with a call for clearly and unambiguously stated timescales.</p>	Bloor Homes South West (Melksham).

Key issues raised (Policy 3 - Reserve sites for housing and broad locations for growth)	Respondent(s)
<p><b>Objections to Trowbridge Broad Location of Growth:</b> There is an objection to further broad areas for growth in Trowbridge, citing a surplus of housing and a lack of necessary infrastructure development, particularly with overstretched roads at Sites 4 and 5. Concerns are raised that the entire site could potentially be developed with 2,100 homes, which is seen as excessive and potentially problematic. The current approach is seen as encouraging developers to promote development between Trowbridge and Hilperton without necessary road improvements. There is a strong emphasis on the need for broad locations for growth to be fully justified and discussed with local communities.</p>	Hilperton Parish Council; Individuals x10.
<p><b>Impact of Trowbridge Broad Location of Growth on Village Character and Neighbourhood Plans:</b> Significant concerns are expressed about undefined urban extensions threatening the separate character and identity of villages. Comments stress the importance of considering the vision, objectives, and policies of neighbourhood plans influencing Trowbridge, particularly regarding landscape setting gap policies. Additionally, Policy 3 is deemed unsound, with fears that extensive development in Hilperton and Staverton would urbanize the villages and reduce greenspaces. The proposal to build outside the Hilperton settlement boundary is seen as failing to follow government guidelines and based on flawed site selection.</p>	Southwick Parish Council; Individuals x10.
<p><b>Allocate more housing at Trowbridge:</b> There is support for Trowbridge as a broad location for growth, with suggestions to increase the proposed allocation size and identify additional land for future growth to maintain a 5-year housing land supply. This includes identifying adjacent land as reserve sites to provide flexibility if the land supply falls below five years. Delays are cautioned against, with a reference to the under delivery experienced at Ashton Park as a potential outcome to avoid.</p>	Barwood Land (Planning Executive); Taylor Wimpey Strategic Land.
<p><b>Allocate more housing at Chippenham:</b> Supporters of further growth at Chippenham recommend modifying Policy 3 and Paragraphs 3.52 and 3.53 to clearly outline growth locations at Chippenham and to identify these on the Policies Map at Figure 4.1. They advocate for allocating additional sites at Chippenham as part of a wider defined growth area, including Gate Farm and/ or Land North of Stanley Lane. There is a general call to direct more growth to Chippenham.</p>	David Wilson Homes; Chippenham Riverside (Formerly Chippenham 2020 LLP).
<p><b>Allocate more housing at Melksham:</b> There is support for the broad location of growth at Melksham in principle, but not towards the end of the plan period, as it does not meet NPPF or PPG requirements. Supporters urge allocating sites to kickstart the vital Melksham bypass. While there is support for long-term growth at Melksham, Policy 3 is criticised for being too ambiguous and non-specific. There are calls to include specific locations to provide more certainty and deliver land for the Melksham Link Canal. Additionally, there are recommendations to allocate additional land, such as at Shaw and Whitley.</p>	Gladman; Melksham Link Ltd; Terra Strategic Land Ltd; Waddeton Park.

Key issues raised (Policy 3 - Reserve sites for housing and broad locations for growth)	Respondent(s)
<p><b>Allocate more housing in Salisbury HMA:</b> Concerns are raised that the Salisbury Area of Search is meaningless, and there is dissatisfaction with neither a broad location of growth nor a reserve site being identified in the Salisbury HMA. It is argued that growth in Chippenham and Trowbridge cannot meet the needs of the Salisbury HMA, hence additional sites should be allocated in this area.</p>	<p>Bloor Homes South West; Persimmon Homes Wessex; Persimmon Homes South Coast.</p>
<p><b>Allocate more housing in Swindon HMA:</b> Policy 3 is criticised as unsound and ineffective due to the absence of identified reserve sites or broad locations of growth in the Swindon HMA, which results from ineffective cross-boundary working with Swindon Borough Council. Comments call for identifying Swindon as a Principal Settlement because it is the most sustainable settlement in Wiltshire, and for including Swindon HMA as a broad location of growth or allocating specific sites, such as The Pry.</p>	<p>Taylor Wimpey Strategic Land; Mac Mic Group.</p>
<p><b>Omission sites</b></p>	
<p><b>Deletion and replacement of Policy 3 with new site allocations:</b> There is a call to delete Policy 3 and instead allocate new sites to meet local housing needs. Additional sites should also be allocated to address the necessary increase in demand and to provide a buffer against potential slowdowns in delivery or lapses in permissions.</p>	<p>Mac Mic Group; Hill Residential Ltd; Great Tew Bantham Estates LLP.</p>
<p><b>Recognition and allocation for Large Villages/ Local Service Centres:</b> Comments suggest recognising the role of housing allocations at large villages and local service centres like Lyneham, which should be designated as a Local Service Centre. Additional land, including a site at Lyneham, should be allocated to address delivery gaps.</p>	<p>Barratts Bristol.</p>
<p><b>Promotion and consideration of omission sites:</b> Several sites have been promoted as omission sites to be considered for allocation. Additionally, the West Warminster Urban Extension is noted as having opportunities for further development within the existing allocation area.</p>	<p>Hannick Homes and Developments Ltd; Quidhampton Developments Ltd; Rosconn Strategic Land Ltd; Hallam Land Management; Society of Merchant Venturers; Baker Estates Ltd; Cala Homes (Thames) Ltd; Chippenham Riverside (Formerly Chippenham 2020 LLP); TOF Corporate Trustees Ltd; Bellway Homes; Castlewood Commercial Properties; Acorn Construction (Newbury) Ltd; David Wilson Homes (Gate Farm); David Wilson (Land North of Stanley Lane).</p>
<p><b>Increase in housing requirement and site capacities:</b> There is a suggestion to increase the housing requirement figure by 10%, enhance the capacity of existing sites, and allocate new sites, with Melksham cited as an example.</p>	<p>Bloor Homes Southwest Melksham.</p>

Key issues raised (Policy 3 - Reserve sites for housing and broad locations for growth)	Respondent(s)
<p><b>Consideration of new settlements or mixed growth areas:</b> Consideration is urged for the benefits of establishing sustainable new settlements or mixed growth areas. Specific suggestions include developing Kemble Airfield on land within Wiltshire adjacent to the existing airfield and creating a mixed growth area at Hullavington to leverage its unique employment focus, which differs from those at the Principal Settlements.</p>	<p>CEG; Barratt David Wilson Homes (Hullavington).</p>

Table 5.13 [Policy 4 - Addressing climate change] key issues

Key issues raised (Policy 4 - Addressing climate change)	Respondent(s)
<b>General policy comments</b>	
<b>Support:</b> Fully support the policy and welcome the clear link between carbon sequestration and the protection, enhancement and restoration of habitats.	Natural England.
<b>Policy 4 does not go far enough in its ambitions</b>	
<b>The Council are not doing enough in relation to the climate emergency:</b> The council are opposed to energy conservation. Policy wording amendments were suggested by the Representor(s).	Individuals x10.
<b>The Policy wording should be more forceful, in order to result in change:</b> Developers should be obliged, rather than encouraged, to bring about significant change	Individual x1; Wiltshire's Climate Alliance.
<b>The climate change policies of the AONB Partnership, have not been implemented with implications for the carbon footprint of new development:</b> The council have not implemented the AONB policies, which has resulted in new buildings that are not reducing the carbon footprint.	North Wessex Downs Area of Outstanding Natural Beauty; Cranborne Chase Area of Outstanding Natural Beauty.
<b>Sustainability targets need to be more rigorous:</b> Targets should demand high levels of sustainability.	Bradford on Avon Town Council.
<b>Building more flats:</b> Maximise building density. This should be reflected within the Policy.	Individuals x10.
<b>Insulation and energy retrofitting:</b> The Plan should have policies which support the retrofit of insulation and renewable energy generation.	Individuals x10.
<b>Re-use of existing buildings and no more greenfield development:</b> There are a lot of empty shops which could be utilised.	Individuals x10.
<b>The Plan should be setting aside land for self and custom-build development:</b> Self builders often build their homes to the highest standard of low/net-zero energy. There is no evidence to suggest the Plan is setting land aside for self or custom-build homes that require high levels of sustainability. Policy wording amendments were suggested by the Representor.	Individuals x10.
<b>Additional detail is required regarding overheating:</b> The policy does refer to overheating briefly (at Criterion C iii & v) but this needs expanding to provide further support or guidance and that more detail is provided for an adaption strategy.	Chippenham Town Council.

Key issues raised (Policy 4 - Addressing climate change)	Respondent(s)
<p><b>The evidence base needs to be updated to reflect the current environmental issues facing the UK:</b> The evidence base in the Wiltshire Local Plan is out of date and does not reflect the issues currently being faced by the UK in relation to the reduction of greenhouse gases and environmental protection. The housing needs forecast is not supported by appropriate evidence and high numbers of new builds will negatively impact Wiltshire's carbon footprint. The Plan is currently not sustainably focused and updated information is needed to effectively reflect the wider UK targets for climate change.</p>	Individuals x10.
<p><b>The Plan is lacking in evidence relating to carbon emissions:</b> There is no evidence base assessing carbon emissions. The Sustainability Appraisal (SA) does not reference the removal of carbon sink. Supporting documents should include an audit of the predicted carbon emissions over the lifetime of the plan.</p>	Bradford on Avon Town Council; Chippenham Town Council.
<p><b>The potential of wind generation should be further examined:</b> There should be further investigation into potential sites in Wiltshire for wind generation on a larger scale.</p>	Bradford on Avon Town Council.
<p><b>Climate change, allocating sites, increased rainfall and flooding:</b> Increased rainfall has brought increased flooding. The Plan should introduce methods to reduce runoff from buildings by increasing the re-use of grey water and rainwater and by implementing more water butts. Site allocations in the Local Plan do not appear to plan for flooding or overheating as a result of climate change.</p>	Pewsey Green; Individuals x10.
<p><b>The Policy should detail how community benefit organisations will be supported in their aims:</b> Further detail is required within the Plan, as to how community benefit organisations will be supported to reach their potential. These companies develop renewable energy projects, whilst seeking to protect and increase biodiversity. Their work should be supported.</p>	Wiltshire Wildlife Community Energy.
<p><b>'Right Tree, Right Place' principals should be advocated within the Policy:</b> There is an over reliance on planting trees to solve climate issues. Better soil management can lead to better carbon capture and therefore it is important to consider the 'right tree, right place' principal.</p>	North Wessex Down Area of Outstanding Natural Beauty.
<p><b>The Policy should be strengthened in relation to public transport provision:</b> Policy 4 seeks to discourage car use; buses encounter the same level of delay as cars. Some Representors suggest introducing bus lanes to make these modes of transport more appealing, increasing bus frequency and for routes to align with new developments.</p>	Alderbury Parish Council; Individuals x10; Chippenham Town Council.
<p><b>Further clarity is required in relation to the preparation of a Sustainable Energy Statement:</b> Policy 4 (Part E) requires the preparation of a Sustainable Energy Statements for all new development. Further clarity with regards the requirements of this document is needed, particularly in relation to how embodied carbon it to be</p>	South West Housing Association Planning Consortium; St Mowden Logistics and The Sealy Family Trust; The Hills Group Ltd.

Key issues raised (Policy 4 - Addressing climate change)	Respondent(s)
taken into account and the need to distinguish between the requirements for major and minor developments. Clarification on the types of a development where a Sustainable Energy Statement would not be necessary is also required.	
<b>Policy wording amendments are required to ensure the aims of net zero are achieved:</b> To properly address climate issues , the policy must be significantly reinforced, fully taking into account the Council's commitment to seek to be carbon neutral by 2030, the recommendations made by Anthesis, the UK government's commitments on carbon reduction and the guidance given by the Climate Change Committee. The Representor recommends that Policy 4 is significantly revised, along with the remaining draft policies, to ensure consistency in relation to the aims of achieving net zero.	Wiltshire Climate Alliance.
<b>Policy 4 goes too far in its requirements</b>	
<b>The policy, as worded, is not flexible enough and may prohibit development:</b> There will be circumstances where it is not viable or technically feasible for a development to fully comply with the criteria in the policy. In order to deliver this policy, an element of flexibility needs to be integrated into it. The respondent suggests that changing the word <i>"must"</i> to <i>"should"</i> would make this policy justified.	Gleeson Land x2.
<b>'Must'/'should':</b> The preface of 'must', with the expectation that all criteria will be addressed without exception risks the policy not being followed fully - the word 'must' should be changed to 'should'.	Cranborne Chase Area of Outstanding Natural Beauty; North Wessex Downs Area of Outstanding Natural Beauty.
<b>Additional cost will have impacts on deliverability and small sites:</b> Deviating from national requirements should be carefully considered. The additional costs appear reasonable however this will have some effect on deliverability in the short term and on small sites.	Paul Bowerman Discretionary Trust; David Wilson Homes; Hills Residential Ltd; Mac Mic Group.
<b>Duplication of national planning policy:</b> It is unnecessary to provide policy on agricultural land when the NPPF provides a clear position.	TOF Corporate Trustees Ltd; St Mowden Logistics; St Mowden Logistics and The Sealy Family Trust.
<b>The Policy goes too far in relation to the protection of agricultural land:</b> A blanket 'protection' of agricultural land is not appropriate or justified.	Barratt Homes Group; Vistry.
<b>Reference to other policies within the Policy is confusing and contradictory:</b> Reference within the policy to other LPR policies is considered an unnecessary duplication and may lead to confusion or contradiction which does not accord with the NPPF requirements.	Miller Homes; Home Builders Federation; Hallam Land Management; Gladman; Terra Strategic Ltd; Bellway Homes; TOF Corporate Trustees Ltd; Barratt Homes Group; Society of Merchant Venturers (SMV); Waddeton Park Ltd; The Stonehenge Alliance; St Mowden

Key issues raised (Policy 4 - Addressing climate change)	Respondent(s)
	Logistics; St Mowden Logistics and The Sealy Family Trust; Wyatt Homes; Bloor Homes (South West) Ltd; Persimmon Homes (South Coast) Ltd; Persimmon Homes (Wessex) Ltd.
<b>Housing/ housing figures related concerns</b>	
<b>The housing figures need to be amended in order to reduce environmental damage:</b> Housing need has been over-estimated and should be reflective of the Wiltshire Local Housing Needs Assessment of 24,455 to reduce environmental damage.	Chippenham Town Council.
<b>Utilising a greenfield site for large scale residential development is in conflict with the environmental aims of the council:</b> The new community of 2,500 homes on a greenfield site is not consistent with the environmental aims of the Council. The new community should be built where residents can utilise local transport infrastructure and are not car dependent suburbs.	Individuals x10.
<b>Transport/ traffic related concerns</b>	
<b>There is conflict between Policy 4 and the transport policies:</b> The Policy will not be achievable because the Plan needs to be developed and reflective of Local Transport Plan 4 policies.	Individuals x10.
<b>Allocations that utilise greenfield sites will result in more, not less, car journeys:</b> The focus on greenfield sites is contrary to this policy because it causes more car journeys due to lack of available transport infrastructure.	Salisbury City Council.
<b>Additional investment is required:</b> There needs to be more investment in non-car based transport throughout Wiltshire.	White Horse Alliance.
<b>Other related points of concern</b>	
<b>Concerns over the Policy's deliverability:</b> Although the policy is commendable, concerns are raised over deliverability.	Individuals x1.
<b>Reference to development management policies within the Policy, is supported:</b> The fact that Policy 4 is supported by development management policies is commended.	Hills Residential Ltd; Mac Mic Group.
<b>New Policy required:</b> There is a need for a new policy that specifically addresses the carbon footprint of the existing built environment to give structure to the actions required.	Wiltshire Climate Alliance.
<b>Policy wording concerns</b>	



Key issues raised (Policy 4 - Addressing climate change)	Respondent(s)
<p><b>Definition required of the term 'carbon neutrality':</b> The term 'carbon neutrality' has not been defined within the Local Plan and is generally not used in UK Net Zero guidance. To avoid confusion the representor suggests replacing with the term 'net zero carbon'.</p>	<p>Miller Homes; Bellway Homes; TOF Corporate Trustees Ltd; Society of Merchant Venturers (SMV); St Mowden Logistics; St Mowden Logistics and The Sealy Family Trust; Barratt Homes; Vistry.</p>
<p><b>The Policy wording is too vague:</b> Policy wording amendments were suggested by the Representor.</p>	<p>South West Housing Planning Consortium.</p>
<p><b>Clarity is required in relation to the term 'circular economy':</b> The term '<i>circular economy</i>' is welcomed. However, the Representor suggests it needs to be defined in the Policy to provide greater clarity on the expected requirements.</p>	<p>Bellway Homes; TOF Corporate Trustees Ltd; Society of Merchant Venturers (SMV); Waddeton Park Ltd; St Mowden Logistics; St Mowden Logistics and The Sealy Family Trust; Barratt Homes; Vistry.</p>
<p><b>Policy wording amendments are required to Part C of the Policy:</b> The wording needs to be amended, particularly in Part C. Policy wording amendments were suggested by the Representor.</p>	<p>The Environment Agency.</p>
<p><b>Any amendments to the development management policies must be reflected in Policy 4:</b> Any proposed amendments to the development management policies (as referenced within Policy 4) must be followed through with subsequent amendments to the wording of Policy 4 to ensure alignment with the new development management policies.</p>	<p>Gleeson Land x2; Miller Homes.</p>
<p><b>Sustainability Assessments (SA) concerns</b></p>	
<p><b>Clarity is required with regard to details within the SA, Appendix A:</b> The SA's Appendix A, Objective 5 references minimising impact on climate change (mitigation) and reducing the vulnerability to future climate change effects (adaptation). These are distinct from each other, and for clarity and soundness, should be listed separately.</p>	<p>Wiltshire Climate Alliance.</p>
<p><b>The SA's Decision Aided Questions (DAQs) are inadequate in relation to climate change mitigation:</b> Only one of the DAQs within the SA, addresses climate change mitigation and it only asks about one approach. Its scope is inadequate. Other important and well-known approaches are described in Policy 4, government guidance and other sources. Without balanced DAQs on climate mitigation, the SA objectives are unsound and so its appraisal is defective.</p>	<p>Wiltshire Climate Alliance.</p>
<p><b>Site specific concerns</b></p>	
<p><b>(Note, site specific concerns submitted against Policy 4 have been summarised here but a detailed consideration of the key issues raised for these site allocations may be found in the relevant allocation policy table)</b></p>	

Key issues raised (Policy 4 - Addressing climate change)	Respondent(s)
<p><b>Policy 27 - Land south of Harnham and Policy 28 - Land west of Combe Road, Salisbury:</b> These sites are not consistent with Policy 4, particularly with regard to transport, as there is a lack of accessibility to the city centre and potential for the site(s) to be highly car dependent which would negatively impact on air quality.</p>	Individuals x10.
<p><b>Sites in Harnham, Salisbury (Policies 24, 26, 27 &amp; 28):</b> The IDP and Atkins Local Plan review do not support the Local Plan proposal for sites in Harnham which rely on the Harnham Gyratory as the key junction, causing traffic and deteriorating air quality. The Representor suggests that all four of these allocations are deleted from the Plan.</p>	Individuals x10.
<p><b>Policy 53 - Land north-east of Hilperton, Trowbridge:</b> The proposed allocation at Hilperton fails to contribute to sustainable active travel between neighbourhoods and relies on private vehicles. This is contrary to Policies 4, 70 and 71 and is therefore is unsound. Additionally, the allocation will negatively impact on surrounding habitats and green and blue infrastructure, which is vital for carbon storage. The allocation should be deleted and a more sustainable location found in Trowbridge which benefits from good access to sustainable transport and active travel methods.</p>	Trowbridge Town Council; Hilperton Parish Council with Hilperton Area Action Group.
<p><b>Policy 26 - Land north of Downton Road, Salisbury:</b> The allocation (and any subsequent development) of this site, goes directly against Policy 4 and will negatively impact on air quality. There are also flooding issues due to the south of Downton Road being on higher ground.</p>	Individuals x10.
<b>Omission Site</b>	
<p><b>Land at Swan Road, Pewsey:</b> This site has been designed to respond positively to planning policy in line with economic sustainability benefits, including careful consideration of measures to mitigate and adapt to climate change.</p>	Paul Bowerman Discretionary Trust; David Wilson Homes.

**Table 5.14 [Policy 5 - Securing infrastructure provisions from new development] key issues**

Key issues raised (Policy 5 - Securing infrastructure provision from new development)	Respondent(s)
<b>Developer contributions (CIL and Planning Obligations)</b>	
<p><b>Transparency and accountability in infrastructure funding:</b> Paragraph 3.73 of the plan mentions that an infrastructure funding statement will be published annually, but it seems this may only be implemented in the future. Providing information on what has been collected from developers and how it is being spent would enhance transparency and accountability, helping stakeholders understand and trust the process of infrastructure funding and allocation.</p>	Cycling Opportunities Group Salisbury.
<p><b>Clarity and roles of funding mechanisms:</b> Questions arise about whether the Community Infrastructure Levy (CIL), a key funding mechanism for local infrastructure, adds financial burdens on council taxpayers. The policy outlines various mechanisms for infrastructure delivery, such as planning conditions, S106 obligations, and CIL. It is crucial for the plan to clearly differentiate these funding mechanisms to avoid duplication or ambiguity, ensuring the effective and viable delivery of necessary development.</p>	Bloor Homes South West; Woodhouse Developments (Amesbury) Ltd; Bloor Homes Ltd (Southern Region); Individuals x10.
<p><b>Developer contributions and infrastructure challenges:</b> Developer contributions often fall short of addressing broader county infrastructure challenges, as they focus on immediate concerns. Large-scale changes are frequently delayed or rejected by LHFIC and Area Board decisions. The plan should recognise existing significant infrastructure challenges and develop effective measures to implement necessary changes to address these broader issues.</p>	Individuals x10.
<p><b>Compliance with NPPF and planning obligation tests:</b> Policy 5 must ensure planning obligations meet the tests outlined in paragraph 57 of the National Planning Policy Framework (NPPF), including being necessary, directly related, and fairly related in scale and kind to the development. These criteria should be clearly recorded in the supporting text to ensure the plan's soundness and compliance with NPPF standards.</p>	Miller Homes; Society of Merchant Venturers; Hill Residential Ltd; Mac Mic Group; David Wilson Homes; Leda Properties; Paul Bowerman Discretionary Trust.
<p><b>Role and significance of CIL:</b> Policy 5 should emphasize the significance of CIL in meeting infrastructure needs from new development, with additional S106 obligations sought only when not covered by CIL and meeting planning obligation tests. Allocations in parishes that will form part of the Royal Wootton Bassett urban area should receive CIL to support community infrastructure. Most essential and place-shaping infrastructure should be delivered through CIL, and this approach should be clearly recognised in the policy.</p>	The Stantonbury Building and Development Company; Royal Wootton Bassett Town Council.
<b>Prioritising infrastructure delivery</b>	

Key issues raised (Policy 5 - Securing infrastructure provision from new development)	Respondent(s)
<p><b>General support for securing ‘essential’ and ‘place-shaping’ infrastructure’:</b> There is general support for Policy 5, which aims to secure both essential and place-making infrastructure through new development. This support underscores the policy’s importance in facilitating comprehensive community development and sustainability.</p>	<p>L&amp;Q Estates; Castlewood Property Ventures Ltd; Cranborne Chase Area of Outstanding Natural Beauty; Hilperton Parish Council with Hilperton Area Action Group; Miller Homes.</p>
<p><b>Importance and prioritisation of place-shaping infrastructure:</b> Policy 5 requires modifications to align with paragraph 3.71, emphasizing that place-shaping infrastructure is as crucial as essential infrastructure for the sustainability and vitality of new communities. Without these changes, the policy may fail to effectively deliver necessary cultural, community, leisure, and recreation facilities, potentially rendering the plan unsound.</p>	<p>Chippenham Town Council.</p>
<p><b>Policy amendments and clarity:</b> Policy 5 needs amendment to explicitly require all new developments to provide necessary on-site and, where applicable, off-site infrastructure. Clarifications are needed on prioritising developer contributions, especially where viability is an issue. The policy should avoid referencing outdated documents like the Planning Obligations SPD and better define infrastructure priorities, including legal requirements like CIL and Biodiversity Net Gain. Additionally, the term "infrastructure" should be clearly defined to avoid ambiguity within the plan.</p>	<p>Trowbridge Town Council; Bloor Homes South West; Ludgershall Homes; Sustainable Calne.</p>
<p><b>Timeline for long-term planning:</b> The current Local Plan Review, covering only up to 2036, is criticised for not accommodating a sufficiently long-term perspective for economic and spatial development strategy and infrastructure planning. This short-sighted approach may hinder the area’s ability to plan effectively for future needs and growth.</p>	<p>Thames Valley Chamber of Commerce Group.</p>
<p><b>Planning Obligations SPD</b></p>	
<p><b>Update and consistency of Planning Obligations SPD:</b> The Planning Obligations SPD, adopted in October 2016, aligns with the growth requirements and spatial strategy of the current core strategy but is now outdated. It must be updated in parallel with the new local plan to ensure consistency with the plan’s objectives and requirements for essential infrastructure and place-shaping. The SPD references the outdated Regulation 123 list, replaced by the ‘Infrastructure List’ in the 2019 CIL amendments, necessitating updates for alignment with the 2023 IDP.</p>	<p>Bloor Homes (South West) Ltd; Persimmon Homes (South Coast Ltd); and Persimmon Homes (Wessex Ltd).</p>
<p><b>Role and reference of Planning Obligations SPD:</b> The policy indicates that SPDs will provide detailed guidance on securing developer contributions, which is appropriate. However, linking the policy to an existing SPD related to an earlier development plan document is contrary to national policy. Planning policy should be established through the local plan process, with SPDs offering additional advice post-adoption. References to the Planning Obligations SPD should be moved to the supporting text to maintain the SPD’s supplementary status to the local plan.</p>	<p>Gleeson Land; Home Builders Federation</p>

Key issues raised (Policy 5 - Securing infrastructure provision from new development)	Respondent(s)
<b>Infrastructure Delivery Plan</b>	
<p><b>Infrastructure Planning and documentation:</b> Documents providing necessary infrastructure information must be available, especially for Salisbury, detailing active travel requirements and funding sources. The Infrastructure Delivery Plan (IDP) needs further detail on healthcare infrastructure to support growth and ensure planning obligations and CIL effectively fund required infrastructure. An appendix in the IDP lists key infrastructure schemes, costs, funding sources, and gaps, but there are concerns about premature assumptions of secured funding for some projects.</p>	<p>Cycling Opportunities Group Salisbury; NHS Bath and North East Somerset and Swindon and Wiltshire Integrated Care Board; NHS Property Services; Highways England.</p>
<p><b>Costing and funding of infrastructure:</b> Evidence for infrastructure costing is deemed unreliable, with significant funding gaps for sustainable infrastructure like walking and cycling measures. The IDP review highlights discrepancies between identified needs and available funding, questioning the deliverability of many transport infrastructure schemes within the plan period. The IDP is criticised for listing undeliverable projects without aligning with the emerging local plan. Salisbury's key infrastructure requirements show concerning funding shortfalls, posing risks to essential infrastructure delivery. Additionally, a key infrastructure project for Westbury, a bridge over the railway off Mane Way, is missing from the IDP and CIL Funding Statement, needing updates to address financial burdens on developers.</p>	<p>Wiltshire Climate Alliance; Salisbury City Council; Persimmon Homes (South Coast) Ltd; and Persimmon Homes (Wessex) Ltd; Individuals x10.</p>
<p><b>Developer contributions and clarity on funding sources:</b> The IDP's Appendix 1v lacks clarity on whether developer contributions are via S106 or CIL, necessitating clear distinctions to justify and effectively seek contributions while avoiding duplication. Grouping Salisbury transport projects within the IDP would be beneficial, addressing concerns about funding allocation towards highways over sustainable transport modes and the completeness of accumulated funding information.</p>	<p>Bloor Homes (South West) Ltd, Persimmon Homes (South Coast Ltd); Persimmon Homes (Wessex Ltd); Cycling Opportunities Group Salisbury.</p>
<b>Viability appraisal</b>	
<p><b>Support Policy 5 consideration of viability:</b> Policy 5 is supported for its allowance of future consideration of viability through the decision-making process, ensuring that necessary adjustments can be made to accommodate changing circumstances and maintain development feasibility.</p>	<p>Ludgershall Homes.</p>
<p><b>Developer contributions and viability testing:</b> The policy recognises that developer contributions may not always be possible due to viability challenges, but the current process for viability testing is seen as unnecessarily cumbersome. Amendments are needed to follow industry standards. The policy should prioritise essential infrastructure when development is unviable but currently creates ambiguity regarding the priority between affordable housing and essential infrastructure. Flexibility is needed for post-submission negotiations on viability matters, and points i-iii should be deleted as they allow developments to proceed without required infrastructure, contradicting sustainability appraisals. Viability assessments should be site-specific and consider essential infrastructure and clawback policies.</p>	<p>Castlewood Venture Partnerships; Baker Estates Ltd; Bloor Homes South West Ltd; Bewley Homes; Woodhouse Developments (Amesbury) Ltd; Bloor Homes Ltd (Southern Region); Bloor Homes South West; Gleeson Land; Harnham Housing Steering Group; Home Builders Federation; Swindon Borough</p>

Key issues raised (Policy 5 - Securing infrastructure provision from new development)	Respondent(s)
	Council; NHS Bath and North East Somerset and Swindon and Wiltshire Integrated Care Board; NHS Property Services; Hills Homes.
<p><b>Site-specific viability assessments and infrastructure delivery:</b> The policy fails to identify key sites for viability testing, making it difficult to deliver essential infrastructure, particularly education. Viability assessments for smaller sites are inadequate, with unrealistic development densities and inconsistent build costs. The Local Plan Viability Assessment does not fully assess strategic allocations in Royal Wootton Bassett, requiring review to ensure proper funding for strategic infrastructure. Definitions for essential and place-shaping infrastructure are needed to prioritise contributions, and paragraph 3.69 should be amended to reference CIL or replacement levies and mandatory biodiversity net gain.</p>	Lydiard Tregoze Parish Council; Gaiger Bros; Royal Wootton Bassett Town Council; Gleeson Land; Ludgershall Homes.
<p><b>Strength Policy 5 to fully reflect NPPF emphasis on considering viability at the Plan stage:</b> NPPF paragraph 58 (September 2023) is clear that where up to date policies have set out contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether circumstances justify the need for a viability assessment at the application stage. The policy needs to be more confidently drafted to ensure that appropriate weighting is attached to up to date policies in terms of viability considerations and exceptional circumstances used in consideration of reasons to consider a viability assessment at a planning application stage. A weak approach to policy in this area could have impacts for the collection of financial contributions to development proposals, including wider strategic infrastructure requirements.</p>	Swindon Borough Council.
<b>Joint and partnership working</b>	
<p><b>Responsibility for joint working on strategic infrastructure:</b> The policy mandates joint working with other authorities for wider strategic infrastructure needs, but it is unclear who is responsible. The council should lead as the local planning authority, as suggested in paragraph 3.64. The updated infrastructure delivery plan should identify specific infrastructure needing joint efforts, providing clarity on responsibilities and funding mechanisms through CIL and S106.</p>	Castlewood Venture Partnerships; Baker Estates Ltd; Bloor Homes South West Ltd; Bewley Homes; Woodhouse Developments (Amesbury) Ltd; Bloor Homes Ltd (Southern Region); Hills Homes.
<p><b>Collaboration with Swindon Borough Council:</b> Collaboration with Swindon Borough Council is crucial for addressing strategic infrastructure needs. The policy's encouragement of joint working is essential to prevent adverse impacts on Swindon. The Statement of Common Ground is not adequate alone; a comprehensive joint strategy is needed for housing, employment, and infrastructure to support Swindon's economic growth and long-term expansion. The current Spatial Strategy fails to recognise Swindon's significance and future infrastructure needs, making the plan ineffective and non-compliant with the Duty to Cooperate.</p>	Swindon Borough Council; Thames Valley Chamber of Commerce Group.

Key issues raised (Policy 5 - Securing infrastructure provision from new development)	Respondent(s)
<p><b>Involvement of local stakeholders and parish councils:</b> Liaison with town and parish councils and local stakeholders through area boards is often overlooked in large development applications. It is essential for establishing local infrastructure priorities, especially in areas like Royal Wootton Bassett. The policy should be amended to ensure direct and consistent involvement of these councils and stakeholders, reflecting their critical role in community planning.</p>	<p>Melksham Without Parish Council; Royal Wootton Bassett Town Council; Trowbridge Town Council.</p>
<p><b>Policy wording and amendments:</b> The first paragraph of policy 5 should be revised to emphasize that joint working with adjoining authorities is essential for addressing wider strategic infrastructure needs. This amendment will clarify the policy's intention and ensure a coordinated approach to infrastructure planning and delivery.</p>	<p>Swindon Borough Council.</p>
<p><b>Transport</b></p>	
<p><b>Infrastructure development and highways improvements:</b> comments emphasize the need for infrastructure development to keep pace with new developments to avoid delays and manage traffic effectively. National Highways supports policies ensuring necessary infrastructure delivery, secured by planning conditions or funding agreements. Concerns include the need for major redevelopment of Junction 16 and the A3102 in Coped Hall, and the impact of new developments in Royal Wootton Bassett on road infrastructure. Specific junction improvements through the Infrastructure Delivery Plan (IDP) and sufficient developer contributions are called for.</p>	<p>Highways England; Salisbury City Council; Persimmon Homes (South Coast) Ltd; Persimmon Homes (Wessex) Ltd; Individuals x10.</p>
<p><b>Sustainable transport:</b> comments highlight the need for sustainable transport solutions to support a sound local plan. Certainty about walking and cycling links and funding for active travel infrastructure is called for, with criticism of the local plan as unsound due to insufficient evidence. Wiltshire's transport policy is seen as lacking solid sustainable measures, with a need for integrated footpaths, cycle paths in new developments, and improved public transport in rural areas. Sustainable transport links are important to support tourism and reduce carbon emissions.</p>	<p>Cycling Opportunities Group Salisbury; Salisbury Area Greenspace Partnership; Amesbury Town Council; Wiltshire Climate Alliance; Individuals x10.</p>
<p><b>Freight routes and car use:</b> comments focus on the need to strengthen freight routes to reduce damage and pollution in rural areas. Concerns are also raised about increased car use due to the lack of local facilities and services, leading to more commuting.</p>	<p>Individuals x10.</p>
<p><b>Transport policy and strategic transport assessments:</b> concerns are raised about the effectiveness and justification of current policies and strategies. Policy 70 is criticised for not requiring developers to ensure infrastructure links between developments. The lack of detailed walking and cycling routes and insufficient funding for these measures render the plan unsound. Updates and thorough evaluations are needed for the Salisbury Transport Strategy and the Local Cycling and Walking Infrastructure Plan (LCWIP). The Transport Evidence Base needs to better assess local traffic impacts and strategic highway junctions.</p>	<p>Salisbury Area Greenspace Partnership; Sustainable Calne; Wiltshire Climate Alliance; Cycling Opportunities Group Salisbury; Highways England.</p>

Key issues raised (Policy 5 - Securing infrastructure provision from new development)	Respondent(s)
<p><b>Specific area concerns:</b> Local issues are highlighted for specific areas. South Chippenham faces concerns about gridlocked roads and lack of pavement connections. Salisbury's topography is seen as unsuitable for road widening. Westbury needs a railway bridge as a key infrastructure project. Warminster's increased parking charges affect local shops, and Trowbridge lacks parking facilities for local churches. The importance of rail infrastructure for sustainable development is also emphasised.</p>	<p>National Rail; Persimmon Homes (South Coast) and Persimmon (Wessex) Ltd; Hilperton Parish Council with Hilperton Area Action Group; Individuals x10.</p>
<p><b>General transport and infrastructure issues:</b> General comments point to the need for improved road and pavement maintenance, addressing flooding issues caused by clogged drains, and considering the impacts of schools on traffic. Better integration of infrastructure provided by different developers is called for to create a cohesive transport network.</p>	<p>Sustainable Calne; Individuals x10.</p>
<p><b>A350 strategic route:</b> The policy is counter to that of the Western Gateway sub-regional Transit Board in relation to the development of the A350 as a new strategic route. In their draft plan it explicitly states that the development of the A350 should not be allowed to facilitate new housing developments or urban sprawl. The policy should be reworked to consider this.</p>	<p>Individual x10.</p>
<p><b>Mineral extraction:</b> In areas where railway infrastructure is nearby to any new or existing schemes affected by the WLP that Network Rail should be contacted. In the case of mineral extraction, the influence zone for the railway may be significantly larger than for other development proposals so early engagement would be requested.</p>	<p>Network Rail.</p>
<p><b>Education</b></p>	
<p><b>Lack of strategic planning and justification for educational facilities in Melksham:</b> Concerns highlight that the proposals for expanding Melksham Oak secondary school, the new primary school (policy 18), and the 100-place nursery (policy 20) lack strategic planning. There is no evidence of considering reasonable alternatives, making the proposals unsound. Issues include children needing to cross the A3102 and questioning the expansion of Melksham Oak over starting a new school. Policy 19 is also deemed inconsistent with national policy and lacks detailed justification.</p>	<p>Melksham Without Parish Council.</p>
<p><b>Lack of viability assessment and proper site evaluation for educational facilities:</b> The Infrastructure Delivery Plan (IDP) is criticised for not identifying key sites in the Local Plan Viability Assessment, resulting in no viability testing for essential education infrastructure at sites 2 (Midge Hall) and 8 (Woodshaw). This lack of assessment undermines Policy 5's ability to deliver the necessary educational facilities, making the plan's viability and effectiveness questionable.</p>	<p>Lydiard Tregoze Parish Council.</p>
<p><b>Healthcare</b></p>	



Key issues raised (Policy 5 - Securing infrastructure provision from new development)	Respondent(s)
<p><b>Funding and resource allocation for healthcare services:</b> There is concern about the lack of demonstrated funding for County and Local Councils to resource increased services, with no plans for new hospitals despite growing population levels. The NHS faces significant funding constraints, exacerbated by new housing developments. It is suggested that new developments should contribute proportionately to healthcare funding, especially in rural areas. Effective area strategies would consistently identify needed healthcare infrastructure to support growth, ensuring policy 5 is well-prepared and provides a sound basis for securing developer contributions toward healthcare.</p>	<p>NHS Bath and North East Somerset and Swindon and Wiltshire Integrated Care Board; NHS Property Services; Individuals x10.</p>
<p><b>Local healthcare service deficiencies:</b> In Warminster, there is a two-week wait for doctor's appointments, highlighting the need for a new surgery, and only two chemists, neither open on Sundays. In Chippenham, securing a GP appointment takes weeks due to shortages, and there is also a shortage of NHS dentists, with no availability for children. In Trowbridge, poor healthcare provision is a major concern, with staffing shortages and no health provision in the Paxcroft estate. The nearest main hospital is in Bath, difficult to reach without a car. There is a notable shortage of GPs, which should be considered when planning new surgeries. The partner for the Trowbridge Health Centre has identified staffing shortages as a major constraint on increasing services, even though the building can accommodate more patients. This highlights the broader issue of GP shortages affecting the ability to expand healthcare services effectively.</p>	<p>Hilperton Parish Council with Hilperton Area Action Group; Individuals x10.</p>
<p><b>Integration of healthcare planning with development:</b> Health provision should be integrated into sustainable development strategies, ensuring access to healthcare services, and securing necessary developer contributions toward healthcare infrastructure. The ability to continually review and optimise the healthcare estate is crucial. Planning policies should support the development and modernisation of healthcare facilities in line with integrated NHS strategies, ensuring effective consultation with the NHS estate transformation.</p>	<p>NHS Bath and North East Somerset and Swindon and Wiltshire Integrated Care Board; NHS Property Services.</p>
<p><b>Climate change adaptation</b></p>	
<p><b>Climate change mitigation and adaptation:</b> The plan should ensure infrastructure development reduces carbon emissions and assists in climate change mitigation, in line with NPPF 153. It must include proactive requirements for developers to consider climate impacts. Infrastructure management lacks clarity and should prioritise climate adaptation and mitigation rather than following an unstructured list. A positive strategy is needed, per NPPF 155, to increase renewable and low carbon energy and heat, making this a part of essential infrastructure.</p>	<p>Wiltshire Climate Alliance.</p>
<p><b>Renewable energy and low carbon infrastructure:</b> The plan should include a positive strategy for increasing renewable and low carbon energy and heat, in line with NPPF 155. This type of infrastructure should be considered essential and integrated into the overall infrastructure strategy to ensure sustainable development.</p>	<p>Wiltshire Climate Alliance.</p>

Key issues raised (Policy 5 - Securing infrastructure provision from new development)	Respondent(s)
<p><b>Electric vehicle charging facilities:</b> Essential infrastructure must include electric vehicle charging facilities and necessary power upgrades. Policy wording amendments are needed to incorporate these elements, ensuring the infrastructure supports the transition to low carbon transportation.</p>	<p>Wiltshire Climate Alliance.</p>
<p><b>Clarity and proactiveness in infrastructure provision:</b> There is a need for greater clarity in managing infrastructure provision. The plan should be proactive in securing infrastructure delivery, adhering to NPPF 153, and prioritising infrastructure that mitigates and adapts to climate change. This will ensure a structured and effective approach to infrastructure development.</p>	<p>Wiltshire Climate Alliance.</p>
<p><b>Green and blue infrastructure</b></p>	
<p><b>Inclusion and expansion of green infrastructure:</b> The list of infrastructure requiring protection and enhancement should be expanded to include green infrastructure, as suggested in Paragraphs 3.66 and 3.69. Additionally, the list of place-shaping infrastructure should consider local nature reserves, allotments, urban street trees, and pocket parks to further support green infrastructure and improve urban environments.</p>	<p>Natural England.</p>
<p><b>Relationship between green infrastructure and sustainable transport:</b> Greater clarity is needed regarding the relationship between green infrastructure and sustainable transport measures. This integration is crucial for developing a cohesive strategy that supports both environmental sustainability and effective transportation systems.</p>	<p>Salisbury Area Greenspace Partnership.</p>
<p><b>Infrastructure in Areas of Outstanding Natural Beauty (AONBs):</b> Paragraph 3.69 does not adequately address the limitations of providing infrastructure in AONBs, which require special care and innovative techniques. The local plan should establish principles ensuring new developments in the Cranborne Chase AONB contribute to sustaining its character and qualities, providing compensation for any impacts to meet conservation and enhancement goals.</p>	<p>Cranborne Chase Area of Outstanding Natural Beauty.</p>
<p><b>Development and integration of Green and Blue Infrastructure Strategy:</b> The Green and Blue Infrastructure Strategy complements Wiltshire's Climate Change Strategy, focusing on the Wiltshire-wide Strategic GBI Network. It plans to develop Settlement GBI Frameworks to address key needs and opportunities for enhancing Local GBI Networks around Principal Settlements and Market Towns. However, these crucial frameworks are missing from the Local Plan Review. Additionally, the 'Working towards a Green and Blue Infrastructure Strategy Plan' envisions creating a Peripheral Greenway to link key local services and improve access to greenspaces, as included in Salisbury's draft Neighbourhood Plan.</p>	<p>Salisbury Area Greenspace Partnership.</p>
<p><b>Community infrastructure</b></p>	

Key issues raised (Policy 5 - Securing infrastructure provision from new development)	Respondent(s)
<p><b>Heritage assets and place-shaping infrastructure:</b> There is strong support for the inclusion of place-shaping initiatives in policy 5, emphasising the need to improve heritage assets and provide long-term archaeological storage. These measures are seen as essential for preserving cultural heritage and enhancing community identity.</p>	Wiltshire Museum.
<p><b>Support strategic planning for community infrastructure:</b> General support is expressed for having a strategic plan for infrastructure, including educational, sporting, and other facilities. Such planning is viewed as vital for helping communities and the county develop effectively, ensuring coordinated growth and development.</p>	Wiltshire Scullers.
<p><b>Sports and leisure infrastructure:</b> Sport England is collaborating with Wiltshire Council on a new playing pitch strategy and hopes for a built facility strategy to determine future leisure provision needs. The importance of having a sound evidence base for new infrastructure is emphasized to meet the needs of the growing population.</p>	Sport England.
<p><b>Community services and spiritual needs:</b> needs in the Canal Benefice, which includes Staverton, Hilperton, and Semington. The community provides various support services, including those for church-affiliated primary schools and elderly support groups, highlighting a need for adequate facilities.</p>	Hilperton Parish Council with Hilperton Area Action Group.
<p><b>Waterways/ utilities</b></p>	
<p><b>Water resources and flooding:</b> In Salisbury, water is being taken from rivers to meet population needs, causing an overburden of nitrates. Great Cheverell faces drainage and flooding issues, along with utility pressures, including water pressure. Housing development on Salisbury's flood plain exacerbates problems due to high water tables and pooling after rain, with no mention of improvements in sewage and rainwater runoff services.</p>	Cheverell Magna Parish Council; Individuals x10.
<p><b>Canal infrastructure and restoration:</b> Policy 94 allows for financial contributions toward improving or restoring Wiltshire's canal network, which can provide essential facilities, including active travel routes, green and blue infrastructure, and leisure spaces. The restoration of Wilts and Berks and Thames and Severn Canals, omitted in the plan, should be included in section 3.7.</p>	Wilts and Berks Canal Trust; Wiltshire Swindon and Oxfordshire Canal Partnership.
<p><b>Development and utility pressure:</b> Great Cheverell faces drainage and flooding concerns, along with pressure on utilities such as water pressure. The plan lacks details on how water services will be improved concerning sewage and rainwater runoff, indicating a need for clearer infrastructure planning.</p>	Cheverell Magna Parish Council; Individuals x10.
<p><b>Undeveloped areas and potential for development:</b> Cotswold Water Park is currently underdeveloped, and its planning status should be reconsidered to leverage development opportunities linked to increased housing levels in the county, which can provide necessary funding for its enhancement.</p>	Wiltshire Scullers.
<p><b>Access to high-speed broadband:</b> There is a significant lack of access to high-speed broadband, which is crucial for modern living and development, indicating a need for improvement in digital infrastructure.</p>	Cheverell Magna Parish Council.

Table 5.15 [Area Strategies Explained] key issues

Key issues raised (Area Strategies Explained)	Respondent(s)
<b>Area Strategies Explained</b>	
<p><b>HMA description:</b> The wide functional HMAs are not referenced in Paragraphs 4.1 to 4.14 in the same way that the FEMAs are explained. Including commentary on the functional HMAs is important to reflect the work taken to align boundaries as best fit and influencing sub regional work on the duty to cooperate and infrastructure delivery.</p>	Ludgershall Homes.
<p><b>A lack of imagination, strategy and awareness of Wiltshire's culture and heritage:</b> There is no questioning of Governments requirements and little regard to climate change and social trends. There is no evidence that the following have been considered: MOD land; 15 minute cities; M4 corridor; infrastructure.</p>	Individuals x10
<p><b>Object to moving Semington from the Chippenham HMA to Trowbridge HMA and the use of out of date commuting data:</b> Given the problems in finding land to develop around Trowbridge, the change was done to facilitate the spread of Trowbridge boundaries into the countryside to the north/north east of the town. Semington continues to be in the Melksham Community Area but is linked to Trowbridge for development and is the only area split in this way.</p>	Westwood, Semington and Wingfield Parish Councils.
<b>Employment</b>	
<p><b>Employment evidence is out of date:</b> The evidence base for Functional Economic Market Areas refers to the Hardisty Jones report which notes their definition is fuzzy with boundaries that overlap and they were defined in 2018. The report does not update these boundaries. Fully review these boundaries in light of post pandemic influences on working patterns, the effects of Brexit becoming apparent, census data being published and changing retail habits. Ensure there is sufficient flexibility built into the policy framework to anticipate the impacts of these factors on the relative functionality of the FEMA post 2024/25 when the Plan is adopted. The distribution of growth to the four HMAs should be applied flexibly in recognition data is not sufficiently up to date.</p>	Gleeson Land (Planning Manager; Gleeson Land).
<p><b>Greater link needed between housing and employment policy:</b> There is a need for greater link on an area by area basis between housing and employment policy.</p>	Home Builders Federation.
<p><b>Heavy reliance on M4,A350 and A3030 corridors:</b> The three FEMA's appear to rely heavily upon the M4, A350 and A303, all of which do not appear to have a level of investment to support the anticipated employment. It is unclear how any of the strategies help to achieve site details in Paragraph 4.17</p>	Individual x1
<b>Rural Areas</b>	

Key issues raised (Area Strategies Explained)	Respondent(s)
<p><b>Large Villages strategy is overly reliant on past rates of delivery and extant commitments:</b> It should take into account the opportunities for villages to grow and thrive especially where this will support local services in line with national policy. The existing allocations could come forward and be delivered relatively quickly. A past completions led approach could limit the ability of Yatton Keynell and Hullavington to accommodate any further growth towards the middle and back end of the plan period. Allocate additional sites at Yatton Keynell and Hullavington.</p>	Cotswold Homes.
<p><b>The subdivision of the area and growth has not been incorporated into strategic policies. Redirect growth:</b> There is no locus for assessing housing land supply at the sub area level and the standard method for setting housing needs does not disaggregate accordingly. Constraints in meeting growth in Salisbury HMA, means that consideration should be given to redirecting some of that HMA growth elsewhere. Trowbridge should be the first focus for this.</p>	Lightwood Strategic.
<p><b>Role of National Landscapes:</b> Paragraph 4.10 should be amended to better reflect the role of National landscapes for their national importance, covering all land uses with the purposes of conserving and enhancing natural beauty.</p>	Cranborne Chase Area of Outstanding Natural Beauty.
<b>Housing and Employment Need</b>	
<p><b>Consider each HMA separately linked to a monitoring framework:</b> It is currently unclear how any under-delivery of housing would be addressed and whether a reserve site in one area of the HMA would be able to be used to meet a housing demand or need in a different area. Each HMA requires its own buffer in the form of allocated sites. The failure to include additional sites means the plan is ineffective and unsound.</p>	Homes Builders Federation.
<p><b>Increase Chippenham HMA and Melksham housing requirement. It is not justified to constrain growth at Melksham:</b> This is due to recent rates of development; the need for the town to benefit from a period of slower growth; and the adequacy of the local infrastructure to support higher levels of growth. There are a number of methodological weaknesses with the transport assessment. Evidence presented within the SA suggests there would be more positive outcomes for a higher rate of development within the Chippenham HMA including at Melksham.</p>	Bloor Homes South West Land to the North of the A3102, Melksham; Bloor Homes South West.
<p><b>The HMA figures do not form part of any Policy and haven't been tested through the Sustainability Appraisal:</b> The status of the HMA figures is unclear and as drafted do not form part of the Spatial Strategy. There is no mechanism for ensuring that housing delivery confirms with the HMA figures other than cumulatively of the individual settlements. This may be intentional. but if the intention that the HMAs do form part of the Spatial Strategy, this should be made clear by specific policy reference, whilst recognising that the 5 year housing land supply is assessed for the whole Plan area. Amend the paragraph or Policy accordingly.</p>	Redrow Homes.

Key issues raised (Area Strategies Explained)	Respondent(s)
<b>Swindon HMA</b>	
<p><b>The duty to cooperate has not been satisfied with regard to potential unmet needs from Swindon:</b> The impact of West of Swindon on population trends has been excluded on the basis that it provided for the population of Swindon rather than Wiltshire. Each HMA based around a single urban centre is not considered sound. The plan also seeks to actively exclude the past influence that meeting the needs of Swindon has on housing need in the Swindon HMA.</p>	Richborough Estates.
<p><b>Swindon isn't identified as a Principal Settlement. There isn't a policy for development in the Swindon area located in Wiltshire:</b> Paragraph 4.12 addresses estimated need for Swindon, however the subsequent policies relating to the Swindon HMA only regard Marlborough and Royal Wootton Bassett, with no policy addressing development in the Swindon area located on Wiltshire's land. Paragraph 4.14 makes no reference to Swindon as a Principal Settlement.</p>	Taylor Wimpey Strategic Land; Taylor Wimpey Strategic Land; Thames Valley Chamber of Commerce Group.
<b>MOD Colerne sites</b>	
<p><b>A failure of the plan is not to include Azimghur Barracks and Colerne Airfield.</b> Table 4.1 is not considered correct. More detail has been provided on this from an employment perspective.</p>	Defence Infrastructure Organisation.
<b>Table 4.1 HMA Figures</b>	
<p><b>The figures should be a minimum. Unlike the Core Strategy CP2, there are no policies for the strategy:</b> The needs within each HMA and levels of growth for settlements and rural areas are not referenced at all in policy and therefore the spatial strategy does not need to be complied with when allocating sites or determining planning applications. They are ineffective. It should be made clear or if not compliance with the spatial strategy will need to be added as a policy requirement. If proposed levels of growth are intended to be material to the site allocations or determination of planning applications, this will need to be explained.</p>	Robert Hitchens Ltd.
<p><b>Supports the proposed distribution across the HMA:</b> Considered to be sound, positively prepared and justified.</p>	Melksham Without Parish Council.
<p><b>The figures haven't been tested through the SA, growth is not in policy and flexibility could affect transport and movement:</b> Express figures as a minimum. These are at best a statistical construct. They should properly be seen as one of many inputs, in addition to which it would among other things be necessary to have regard to a range of other factors before arriving at a final high level disaggregation. This is not robust and sound.</p>	Go South Coast Ltd.

Key issues raised (Area Strategies Explained)	Respondent(s)
<p>No policies underpin the area strategies, unlike the Wiltshire Core Strategy CP2. The needs within each HMA and the levels of growth for settlements and rural areas are not referenced at all in policy. This approach is not robust and unsound. Whilst the plan should offer a degree of scope for flexibility, this is different to inference that a development in the Trowbridge or Chippenham HMA can meet the needs arising in Salisbury HMA. It will unmoor the process of site allocation from crucial principles set out in NPPF Chapter 9 about transport and movement. Provide a clear policy steer.</p>	
<p><b>Reliance on subsequent Development Plan Documents will only make a limited contribution to the housing supply in this plan period:</b> To be found sound a number of modifications will be required: Clarity on whether or not there is flexibility to meet the needs of rural areas across HMA boundaries, or if not, the rural area requirements will need to be introduced into policy; A contingency mechanism to allow the shortfalls in one high-order settlement to be addressed at other locations; Identify and allocate the new community or if not, alternative sites will need to be identified to remedy the resultant shortfall of 1,600 homes; Allocated additional sites or Introduce a permissive policy to supplement the supply of housing that arises from the deferral of sites; Demonstrate that the allowances for Neighbourhood Plans and the rural allowance are reliable.</p>	Mac Mic Group.
<p><b>Missing single distribution policy:</b> There is no single policy that sets and explains the distribution of housing and employment need between the HMAs in order to meet the needs set out in Policy 2. Not does it set out the response if a shortfall was to arise over the plan period in one or more of the HMAs. This is critical given the the very constrained nature of some main settlements. The Chippenham HMA should direct significantly more development to Chippenham itself in the plan period. Chippenham has the capacity. Allocate Land East of Chippenham.</p>	Chippenham Riverside (Formerly Chippenham 2020 LLP).
<p><b>Delivering Allocated Sites</b></p>	
<p><b>Masterplanning approach is ineffective:</b> it unnecessarily adds another post Local Plan approval state, which will delay the delivery of new homes and lead to housing supply shortfalls. The Local Plan should be as flexible as possible and should not incorporate policy requirements that will delay housing delivery. Site allocation policy should incorporate sufficient detail on the key site deliverables but leave as much flexibility as possible to the planning application stage. There is no need for a separate masterplanning process and no need to incorporate a Concept Plan within the Local Plan. If relying on concept plans, such plans must be as flexible as possible and only include sufficient detail to meet genuine and clearly identified policy objectives and only enough information to avoid the need for subsequent masterplan documents to be prepared.</p>	Gleeson Land (Planning Manager); Gleeson Land.
<p><b>The masterplan approach isn't clear:</b> It is considered to approve each masterplan will lead to delay in the preparation of planning applications, resulting in an unnecessary slowing down of the delivery of housing and undermining the housing trajectory. Planning applications are being prepared in parallel with the drafting of the</p>	Pegasus Planning Group.

Key issues raised (Area Strategies Explained)	Respondent(s)
Local Plan, so that it can be submitted as soon as possible and development can support the delivery of housing in a timely manner. The approach is not justified and will delay the preparation of planning applications and the delivery of housing. Alternative wording is suggested.	
<b>Concept plans must be treated as purely indicative:</b> Paragraph 4.16 wording is somewhat more open and non committal in nature. Concept plans have some use, but there must be caution that they are highly indicative and that no planning application must be determined in accordance with them.	Ludgershall Homes.
<b>Chippenham Area Distribution of Growth</b>	
<b>Delivery of Chippenham sites is unrealistic:</b> Table 4.2 proposal is in addition to rolling forward an existing allocation CH1 SW Chippenham. These two sites are located adjacent to one another. CH1 remains unimplemented. Delivery from these sites is unlikely to commence for many years to come. Question whether it is reasonable to expect these sites to be built out by 2038. Additional sites including sites at Large Villages will be needed to ensure the housing needs of the HMA are to be met.	Cotswold Homes.
<b>Appendix C Housing Trajectory</b>	
<b>Delivery:</b> Appendix C housing trajectory should clearly show where and when the delivery the housing will occur, but it currently does not.	Home Builders Federation.



## Local Plan section 4: Strategy for the Chippenham HMA

**5.24** Please see below the key issues tables listing the key issues raised for the parts of the plan within section 4: Strategy for the Chippenham HMA, namely:

- Strategy for the Chippenham Housing Market Area
- Policy 6: Chippenham Principal Settlement
- Policy 7: Land South of Chippenham and East of Showell Farm
- Policy 8: Chippenham Town Centre
- Policy 9: Calne Market Town
- Policy 10: Land off Spitfire Road, Calne
- Policy 11: Land to the North of Spitfire Road, Calne
- Policy 12: Corsham Market Town
- Policy 13: Land South of Dicketts Road
- Policy 14: Devizes Market Town
- Policy 15: Land at Devizes Wharf
- Policy 16: Malmesbury Market Town
- Policy 17: Melksham Market Town
- Policy 18: Land East of Melksham
- Policy 19: Land off Bath Road
- Policy 20: Land North of the A3102

Table 5.16 [Strategy for Chippenham HMA] key issues

Key issues raised (Strategy for Chippenham HMA)	Respondent(s)
<b>Soundness of Plan</b>	
<b>Plan is not sound</b> : The Plan is not consistent in its Strategic Objectives	Gleeson Land (Planning Manager).
<b>Plan is not based on up to date evidence:</b> A high housing requirement is not in keeping with the identity of the County. Will damage the local environment. Further car dependence. Abandon the Melksham Bypass and instead use funds to improve public transport and active travel. Improve employment opportunities across the HMA, including in Melksham.	Chris Tweedle; Individuals x10.
<b>Overarching lack of forward planning; Allocate additional sites:</b> for example in Sutton Benger	Gladman.
<b>Chippenham HMA</b>	
<b>Supports Chippenham as a Principal Settlement and higher growth in the Chippenham HMA. Allocate further sites. Focus on Chippenham and Melksham:</b> Compensate for housing shortfalls within other HMAs, notably Salisbury. In relation to employment provision, it is important to recognise that proximity and ready access to the SRN (motorways/trunk roads) is a necessary prerequisite for swift take up and development. At Chippenham, evidence demonstrates that sites are well located to the north and west of the town, and in close proximity to the M4 have achieved higher rates than less well located/mixed use sites.	Gleeson Land (Planning Manager); Gleeson Land.
<b>Housing Distribution</b>	
<b>Table 4.2 lacks clarity with the rural area providing second highest contribution to the housing supply. Adjust to focus on main settlements:</b> This is not consistent with a delivery strategy that aims to balance homes and jobs and to address the causes of climate change.	Gleeson Land (Planning Manager); Gleeson Land.
<b>Allocate additional sites at Large Villages:</b> Already Includes new allocations and carries forward existing allocations including unimplemented CH1 at Chippenham. Additional sites at the large villages will be needed to ensure the housing needs of the HMA are met.	Cotswold Homes.
<b>Update Table 4.2</b> : It is an odd table presentation.	Melksham Without Parish Council.
<b>Further Consultation</b>	
<b>Proposals are significant and should have been subject to further Regulation 18 consultation:</b> Distribution between towns has changed and are significant. These should have been subject to further consultation for communities to express their views.	Great Tew Bantham Estates LLP.

Key issues raised (Strategy for Chippenham HMA)	Respondent(s)
<b>Employment Distribution</b>	
<b>Table 4.3 lacks clarity and apportionment does not follow the Councils evidence base:</b> One potential employment site identified at Melksham, but this isn't included as an allocation. Need to recognise for Chippenham and Melksham that proximity and ready access to the SRN is a necessary prerequisite for swift take up and development of employment land.	Gleeson Land (Planning Manager); Gleeson Land.
<b>Employment Figures are inaccurate Insufficient employment and housing has been provided:</b> Allocate Azimghur Barracks and Colerne Airfield.	Defence Infrastructure Organisation.
<b>Chippenham</b>	
<b>Objections to Policy 7 Chippenham site:</b> Object to the scale and timeframe of development including in the context of climate crisis. Site will take long time to build out. Roads will be busy. Reduce the housing requirements and build infrastructure.	Individuals x10..
<b>Corsham</b>	
<b>Do not agree with Paragraph 4.23 that Corsham has accommodated greater levels of housebuilding than originally planned and has constraints.</b> Corsham has accommodated exactly the amount of new homes that was originally planned. Corsham is not constrained. Severe reduction in the housing target will have implications for people in need in the town, by constraining supply. Allocate Land North of Bath Road	Great Tew Bantham Estates LLP.
<b>Melksham</b>	
<b>Support Paragraph 4.22 Melksham:</b> Compared to other settlements, Melksham is less constrained.	Terra Strategic Ltd.
<b>Melksham Bypass:</b> Paragraph 4.22 refers to but makes no provision for a bypass. Delete these references. Consider in a future plan.	Gleeson Land; Gleeson Land(Planning Manager).
<b>Employment Land Distribution</b>	
<b>Object to employment land distribution and lack of recognition for Kemble Airfield/Cotswold Business Park:</b> The function of the airfield has not been recognised as a significant location for employment not logically associated with the remainder of the HMA. Allocate Cotswold Business Park for expansion. Concerned about employment land distribution in Paragraph 4.26 and Table 4.3, with the majority awarded to Chippenham and none within the Rural Area. Revising the Spatial Strategy document says figures are highly indicative, but there is no warning in the text. The interaction between the Functional Economic Market Area (FEMA) and HMA is not addressed. There is a substantial need for employment development in the M4/Swindon FEMA where there is a shortage of employment land.	Kemble Business Park Estates.

Key issues raised (Strategy for Chippenham HMA)	Respondent(s)
<b>Incorrect Photo</b>	
<b>Page 43:</b> Photo for the Chippenham HMA is Malmesbury.	LD&PC Ltd.

Table 5.17 [Insert policy number / local plan reference] key issues

Key issues raised (Policy 6 - Chippenham Principle Settlement)	Respondent(s)
<b>Principal Settlement</b>	
<b>Supports proposals for Chippenham:</b> Supports southern link road that will relieve traffic in Chippenham and Bremhill.	Bremhill Parish Council
<b>Broadly support Chippenham as a Principal Settlement and primary focus for growth:</b> Chippenham has few environmental constraints and does have strategic linkages.	Hallam Land Management; Bloor Homes South West; Glleeson Land (Planning Manager); Gleeson Land Robert Hitchems Ltd; David Wilson Homes (Gate Farm); Waddeton Park Ltd.
<b>Chippenham's role as a Principal Settlement hasn't been justified. It is a dormitory town:</b> There are few jobs so people commute out; Use brownfield sites and restrict development to meet local needs.	Save Chippenham; Individuals x10.
<b>Omission Sites</b>	
<p><b>The following sites, already assessed through the site selection process, have been promoted as omission sites:</b></p> <ul style="list-style-type: none"> <li>• Gate Farm,</li> <li>• Rawlings Farm extension</li> <li>• Land West of Chippenham</li> <li>• Barrow Farm</li> <li>• Land West of Chippenham Adj A420</li> <li>• Land off Saltersford Lane</li> <li>• Hunters Moon Site parcel of land</li> <li>• East Chippenham</li> <li>• North of Stanley Lane</li> <li>• East Chippenham</li> </ul>	David Wilson Homes (Gate Farm); Crest Nicholson South West & Summix; Bloor Homes South West Ltd; Robert Hitchens Ltd; Richborough; Waddeton Park Ltd; Bloor Homes (South West); Chippenham Riverside(Formerly Chippenham 2020); David Wilson Homes (North of Stanley Lane); Chippenham Riverside (Formerly Chippenham 2020).
<b>Housing Requirement</b>	

Key issues raised (Policy 6 - Chippenham Principle Settlement)	Respondent(s)
<b>Increase the housing requirement for Chippenham and allocate a greater number and range of sites</b>	David Wilson Homes (Gate Farm); Crest Nicholson South West & Summix; Bloor Homes South West Ltd; Robert Hitchens Ltd; Richborough; Waddeton Park Ltd; Bloor Homes (South West); David Wilson Homes (North of Stanley Lane); Chippenham Riverside (Formerly Chippenham 2020).
<b>Number of dwellings is above the residual housing requirement required with no justification:</b> Reduce the site allocation housing requirement. By not including small windfall sites does not provide a true and accurate figure.	Lacock Parish Council; Chippenham Town Council; Individuals x10; Save Chippenham.
<b>Residual requirement:</b> Chippenham's residual requirement should be reduced by including a windfall allowance and more optimistic assumptions about the scale of brownfield development coming forward over the Plan period.	Chippenham Town Council.
<b>Brownfield Site opportunities</b>	
<b>Brownfield opportunities are higher when considering premises vacated following the pandemic and the change of use provisions:</b> Investigate further brownfield opportunities	Individuals x10
<b>Older people:</b> It has not been explained how the housing needs of older people will be met at Chippenham.	Individuals x10
<b>Site Selection Process</b>	
<b>Site selection is unsound and does not meet legal requirements:</b> Evidence shows East Chippenham Site 1 should be the preferred option. Planning for Chippenham Paragraph 61 issue in relation to deliverability and availability relates to access to Rawlings Green is entirely unevidenced. Increase the housing requirement and allocate East Chippenham either alongside or together with South Chippenham.	Chippenham Riverside (Formerly Chippenham 2020).
<b>Site Selection Conclusions</b>	
<b>Disagree with the site selection assessment conclusions:</b> For new pathways and the River Avon corridor.; vehicle movements should be scored and infrastructure costings be included and the public be allowed to decide what is a strength, weakness or neutral.	Individuals x10
<b>Disagree with the rationale for selecting South Chippenham site, which reinforces a car culture:</b> The site is 2.5miles from the train station and town centre and 1.9miles from the community hospital and this reinforces a car culture that is not justified and fails to comply with policy requirements.	Save Chippenham; Individuals x10.

Key issues raised (Policy 6 - Chippenham Principle Settlement)	Respondent(s)
<b>Placeshaping Priority 1 Employment</b>	
<b>Employment opportunities are limited and allocating employment land does not guarantee employers will locate in Chippenham:</b> Opportunities are limited with little growth in quality jobs, resulting in an increasing number of commuters, who will drive up housing costs and increase traffic and pollution.	Individuals x10.
<b>Southpoint Business Park has permission, but no development has taken place:</b> Allocate for mixed use employment and housing development instead.	Individuals x10.
<b>Development at M4 J17 -</b> This will provide a significant amount of new employment land and thus less is required in other areas of Chippenham.	Individuals x10.
<b>The proposed figure of 42ha across Chippenham and 15ha allocated is far too high and will far outstrip demand:</b> Taking the allowance from Corsham is unsound and unjustified. Unclear what effects will be had on commuting. Additional evidence is required regarding this, and any impacts that 'working from home' may have on this.	Save Chippenham.
<b>Proximity and ready access to the SRN (motorway) is a necessary prerequisite for take up and development of allocated land:</b> Sites located to the north and west and in close proximity to the M4 have achieved more than less well located/mixed use sites. Include a new second criterion [New Criteria Wording suggested]	Gleeson Land(Planning Manager); Gleeson Land.
<b>Allocate brownfield sites:</b> There are brownfield commercial sites not being utilised and new employment will not wish to come to the area.	Individuals x10.
<b>Placeshaping Priority 2 Town Centre</b>	
<b>Highlighting vacant units and impact of loss of car parking:</b> There are lots of vacant units in the town centre. The Bath Road Car Park is used by parents of Ivy School Children and losing it would be a safety risk.	Individuals x10.
<b>Explore higher density housing and mixed use development on Bath Road Car Park and Bridge Centre Site [Bullet Point 3]:</b> Proposal for retail led development is unsound and would disadvantage the retail areas.	Individuals x10.
<b>Lack of potential investment evidence for Bridge Centre site and Emery Gate:</b> Where is the evidence that the owners or potential development will wish to invest in Bridge Centre site and Emery Gate?	Individuals x10.
<b>Placeshaping Priority 3 River Corridor</b>	
<b>River Avon placeshaping:</b> By strengthening the recreational role of the River Avon area in the town, opportunities exist to establish a strong relationship with open space for all residents and support its growth.	Wiltshire Council (as landowner).

Key issues raised (Policy 6 - Chippenham Principle Settlement)	Respondent(s)
<b>Doesn't mention protected route of the Wilts and Berks Canal:</b> Although a diversion route to the River Avon north of the town centre is shown on the proposals map. Amend Policy 6 to include a reference to the Wilts and Berks canal.	Individuals x10; Wiltshire, Swindon and Oxfordshire Canal Partnership.
<b>Supports Policy 6, but bullet point could be strengthened:</b> To ensure that there is mention of improvements for biodiversity, amenity and flood risk.	Environment Agency.
<b>Place shaping Priority 4 Connectivity</b>	
<b>Bullet point 4 contradicts separate document about footpath and cycling network:</b> Bullet point 4 says Sustrans route between Chippenham and Calne is in poor repair, not suitable for commuting and unlikely to be improved.	Sustainable Calne.
<b>Supports place shaping priorities 4 (Ensuring a network of well-connected footpaths and cycleways) and 5 (Link A4 to A350)</b>	Highways England.
<b>Placeshaping Priority 5 New Road</b>	
<b>Delivering one site with significant infrastructure will be challenging and risks under delivery:</b> A site with significant road infrastructure will have environmental effects that would not arise where existing roads can be used and with a focus on active and public transport options.	Bloor Homes South West Ltd.
<b>Support Chippenham as a Principal Settlement but the proposals will present delivery risks due to the dependence on a southern link road:</b> Without this link road, it is unclear how development could be accommodated without creating traffic congestions across the town and will affect bus service operations.	Go South Coast Ltd.
<b>There is an overriding focus on having a new road with housing and employment used to justify it.</b>	Individuals x10.
<b>Provide an alternative link road through Rowden Park site:</b> Relying on a link which crosses several landownerships, includes a bridge and causes harm to the setting of Lackham House is not viable and could impact on site deliverability.	Redcliffe Homes.
<b>Support East and Southern Road to link A4 with A350:</b> To provide long term solution to traffic congestion, long term policies must include a relief road.	Chippenham Without Parish Council.
<b>Bullet Point 5 and Paragraph 4.29 is not supported by evidence:</b> Specific traffic modelling hasn't been included for the proposed new road. Its purpose is not understood.	Chippenham Town Council; Save Chippenham; Individuals x10.
<b>Sustainability:</b> The Local Plan wrongly states that the new road would encourage sustainable travel - the road is unjustified by evidenced need.	Individuals x10.



Key issues raised (Policy 6 - Chippenham Principle Settlement)	Respondent(s)
<b>Road is uncosted:</b> It will place a burden on the delivery of the site.	Bloor Homes South West Ltd; L&Q Estates.
<b>Healthcare</b>	
<b>Healthcare Infrastructure is missing from place shaping priorities:</b> The Infrastructure Delivery Plan does not identify key healthcare infrastructure projects in this location. Modify Policy 6 to include another place shaping priority.	NHS Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board.
<b>Employment Land at M4 Junction 17</b>	
<b>Introduce policies for M4 Junction 17 to avoid developer led piecemeal development.</b>	Chippenham Without Parish Council.
<b>Existing Employment Sites</b>	
<b>Draft Policy 6 does not specifically identify Langley Park Industrial Estate.</b> The explicit support for Langley Park Industrial Estate has not been carried through to this updated emerging draft document.	Schroders Real Estate Management); SREIT Property Ltd.
<b>New Allocation [also Policy 7]</b>	
<b>Supports Policy 7 site allocation in principle, but delete 15ha employment land and replace with more housing to boost supply.</b> There is no evidence to support employment land and the plan is not positively prepared or effective.	Hallam Land Management; Gleeson Land (Planning Manager); Gleeson.
<b>Supports Policy 7 site allocation.</b>	Langley Burrell Parish Council; Chippenham Without Parish Council.
<b>Focussing on only one site is unambitious:</b> Fails to reflect the focus for growth that the vision and evidence requires of the town.	Bloor Homes South West Ltd.
<b>Focussing on one site in an expanding floodplain is high risk:</b> It was not the top scoring site in the selection process and poses a major additional flood risk south to Lacock that Sustainable Urban Drainage Systems (SuDS) could not alleviate. Climate change impacts have not been fully researched.	Individuals x10.
<b>Delivery Trajectory is likely to be slow:</b> Evidence needed to show how 2500 homes can be delivered in the plan period to 2038. Actual delivery rates for Rawlings Green and South West Chippenham are below the planned rates. Alternative strategies are likely to be more effective. Updated trajectories should be provided. [Appendix C]	Bloor Homes South West Ltd.
<b>Amend bullet point:</b> To refer to master planning by developer consortium and that the area has the potential to accommodate approximately 4000 homes.	Gleeson Land (Planning Manager).

Key issues raised (Policy 6 - Chippenham Principle Settlement)	Respondent(s)
Remove Policy 7 South Chippenham allocation until the sequential test is passed.	Environment Agency.
<p><b>Settlement boundary</b></p> <p><b>The following amendments have been suggested:</b></p> <ul style="list-style-type: none"> <li>• The A350 to remain the strategic western boundary between Chippenham Town and Chippenham Without Parish.</li> <li>• There should be no further incursion into Langley Burrell Without Parish.</li> <li>• Include Land North of Chippenham and Hunters Moon sites, which are both completed or nearing completion.</li> </ul>	Chippenham Without Parish Council; Langley Burrell Parish Council; Persimmon Homes Wessex; Chippenham Town Council.
<b>Farms</b>	
Opposed to the sale of publicly owned farms for short term gain.	Individuals x10.
<b>Figure 4.2 Concept Plan [Policy 7]</b>	
<p><b>Proposed concept plan amendments suggested including:</b></p> <ul style="list-style-type: none"> <li>• Replace the blanket 35dph with a mix of densities.</li> <li>• Delete the reference to LEAPs, because they are poor and equipment unsuitable for families.</li> <li>• Important views into and out of site allocation, air quality and noise impacts haven't been considered. Doesn't reflect Figure 8 Chippenham Landscape Setting Assessment Report for the Chippenham Site Allocations Plan</li> </ul>	Individuals x10.
<b>Neighbourhood Plan Designation</b>	
<p><b>Object to reliance on neighbourhood planning to meet the requirement for 200 homes:</b> It is unclear, whether, how, where and when this requirement will be provided.</p>	Richborough.
<p><b>Express the Neighbourhood Plan requirement as a minimum :</b> To avoid under delivery caused by a lack of clarity, [Wording proposed].The existing Chippenham NP doesn't allocate sites. and to avoid backloading of housing delivery, the Local Plan should address the gap.</p>	David Wilson Homes(North of Stanley Lane).
<p><b>The NP figure is unjustified by the evidence.</b> Likely to be small and medium sized brownfield sites not taken into consideration. An increase in brownfield dwellings could then result in a more accurate residual requirement.</p>	Chippenham Town Council.

Key issues raised (Policy 6 - Chippenham Principle Settlement)	Respondent(s)
<b>Climate</b>	
<b>Tackle the climate emergency:</b> Provide further evidence and commitment.	Individuals x10.

**Table 5.18 [Policy 7 - Land south of Chippenham and East of Showell Farm] key issues**

Key issues raised (Policy 7 - Land south of Chippenham and East of Showell Farm)	Respondent(s)
<b>Supports Policy 7</b>	Bremhill Parish Council.
<b>Support:</b> Support the allocation, with commitment to work with the multiple landownerships to bring the site forward. Commitment to partnership working is established through a Memorandum of Understanding. The council has been working with other promoters to create a collective masterplan for the whole of the site allocation.	Wiltshire Council (as landowner).
<b>Bullet Point 1 (New Road)</b>	
<b>Funding for the road:</b> Following withdrawal from the Grant Determination Agreement with Homes England there is currently no external funding to support delivery of the A4-A350 distributor road, which is likely to impact on when the road is delivered, particularly in light of the reduction of proposed allocation for 2,525 homes. It is therefore suggested that an increase in housing numbers to around 4000, acknowledging this uplift would come forward post 2038, be made to the plan. This would allow the infrastructure funding and viability of the site to be secured.	Wiltshire Council (as landowner).
<b>Supports the broad alignment of the route of the new road. Land has been safeguarded:</b> A separate vehicular access is secured off the Patterdown Road (B4528) north of the Lackham Roundabout which supports early delivery of the western part of the allocation, ahead of the wider transport corridor needing to be in place. The transport assessment that supports the application demonstrates that the proposals submitted by Hallam are not reliant on this route for connectivity nor to mitigate the impact of the proposals on the existing road network.	Hallam Land Management.
<b>Lack of funding for new road</b> - Supports the principle of the new road, but the withdrawal of external funding will likely impact on the timing of its delivery, especially in light of the reduced proposed allocation.	Gallagher Developments Ltd.
<b>Objections raised about the deliverability and viability of the proposed road route and an alternative road route through adjacent CH1 Rowden Park is promoted:</b> The proposed route traverses several ownerships, includes a bridge, will cause harm to the setting of Lackam house and is not deliverable or viable. No evidence has been provided that there is funding in place for this significant piece of infrastructure. The alternative route would utilise existing infrastructure, be shorter in length and costs would be reduced. It would impacts on the setting of any listed buildings and avoid the use of best and most versatile agricultural land.	Redcliffe Homes.
<b>Support the principle of a new road connecting the A4 and A350:</b> However, the route shown is just one possible alignment. The council accepts that additional assessments are required to ascertain any trigger points needed for the delivery of the transport corridor.	Wiltshire Council (as landowner).

Key issues raised (Policy 7 - Land south of Chippenham and East of Showell Farm)	Respondent(s)
<p><b>Objections raised about the new road, transport modelling and viability evidence including:</b></p> <ul style="list-style-type: none"> <li>• Need for a road including bridges is due to an excessive housing requirement</li> <li>• No traffic modelling for the new road or costs for the road and bridges has been provided.</li> <li>• The policy will increase traffic into the town, exacerbating congestion at the Bridge Road roundabout. Address this and include transport links for the A4 northwards to the A350 in Chippenham.</li> <li>• The proposed road will not encourage sustainable transport and is not justified. Most journeys will be by car. Bus services are poor and the area will not attract people who do have their own transport.</li> </ul>	individuals x10.
<p><b>A road link is important, but this should be designed to provide for through traffic.</b></p>	National Trust.
<p><b>Broadly support focus for growth at Chippenham, but concerned that the approach taken continues to present significant delivery risks owing to the dependence on a southern link road:</b> Without this road could cause increased traffic congestion across the town and would jeopardise the operation of existing bus services. Trigger points to delivery the road for the development trajectory are needed. Bring forward the land closest to the A4 London Road and existing bus corridor first.</p>	Go South Coast Ltd.
<p><b>Infrastructure Delivery Plan and Viability Assessment</b></p>	
<p><b>Viability:</b> Requests that wording be included in Policy 7 that allows flexibility in any masterplan to respond to any local market conditions that might subsequently affect viability of the development.</p>	Wiltshire Council (as landowner).
<p><b>No road costs and no trigger points for the road delivery have been provided, overselling the benefits of the southern distributor road:</b> L&amp;Q have carried out their own detailed review. There must be certainty as to the viability of South Chippenham and associated infrastructure. This does not appear in the draft Local Plan or evidence base.</p>	L&Q Estates.
<p><b>Delivery challenges</b> - The site faces significant delivery challenges that must be taken into account in terms of the delivery timings and quantum of housing that will be provided within the plan period. Major infrastructure would be required and this schemes viability has not been robustly demonstrated in the Local Plan evidence base.</p>	Chippenham Riverside (Chippenham 2020).
<p><b>The Council's assumptions about housing delivery are unrealistic</b> - Policy 7 site size and scale will take years before a planning permission is in place and work has commenced, potentially towards the end of the Plan Period and beyond. Development delivery is complicated, for example Policy 7 requires a river crossing</p>	Metis Homes.

Key issues raised (Policy 7 - Land south of Chippenham and East of Showell Farm)	Respondent(s)
which requires not only planning permissions but other approvals negotiated and coordinated. There is a significant cost which will need to be equalised across the land owners and will likely have implications for planning application and other infrastructure delivery. The Council's approach is illogical and unsound.	
<b>Infrastructure costs</b> - Infrastructure costs have not been adequately dealt with.	Individual x10.
<b>Potential cumulative impacts for the SRN are not sufficiently evidenced:</b> The potential cumulative impacts for the SRN are not sufficiently evidenced at this stage. Would welcome further discussion with Wiltshire Council to better understand potential SRN impacts, and the risks associated with current funding constraints for infrastructure.	Highways England.
<b>Bullet Point 2 Sustainable Transport</b>	
<b>Urban form and travel:</b> To facilitate positive placemaking, new development should be arranged as compact areas consolidated around local centres to create sense of place and functionality. The urban form should be designed to encourage more active and sustainable travel choices. Support policy requirement for the improvement of cycling/walking connections, which should link to the town centre, employment, neighbourhood hubs, schools and sports facilities.	Wiltshire Council (as landowner).
<b>Policy 7 is not effective:</b> The site development proposals are heavily car dependent / distant from the town centre and facilities. A comprehensive Cycling, Walking and Public Transport strategy is required.	Save Chippenham; Individuals x10.
<b>The Chippenham Local Cycling and Walking Improvement Plans needs to be published:</b> These should also be reviewed to ensure that it provides appropriate schemes that can be applied as mitigation for the allocation site.	Cycle Chippenham.
<b>The site could substantially exacerbate current bus journey problems around the town:</b> Include specific mitigation measure to ensure existing and new bus services can operate efficiently.	Go South Coast Ltd.
<b>Policy 7 Site Boundaries</b>	
<b>Proposed amendment to exclude the Forest Farm complex and two properties known as "Gorley" and "The Gables" from the site:</b> These areas are not part of the Gleeson land interest.	Gleeson Land (Planning Manager); Gleeson Land.
<b>The development boundaries should be final and not be changed in the next review of the Local Plan</b>	Individuals x10.
<b>Objections to the loss of greenfield land including:</b>	

Key issues raised (Policy 7 - Land south of Chippenham and East of Showell Farm)	Respondent(s)
<p><b>Would cause unacceptable damage to the local environment through the destruction of high quality farmland and wildlife habitat:</b> It is important that green buffers to the surrounding countryside are substantially planted with trees, in line with the Chippenham Neighbourhood Plan policy. Existing green corridors which cross Pewsham Way need to be improved.</p>	Individuals x10.
<p><b>The proposed Green and Blue Corridor is a token gesture in the context of loss of green fields:</b> The biodiversity net gain policies mitigate to some extent, but are not enough to resolve the urbanisation on this scale.</p>	Individuals x10.
<p><b>Habitats will not be created. Any development will remove and impact existing habitat areas.</b></p>	Individuals x10.
<p><b>Extension of the River Avon Country Park:</b> Support the requirement for the extension of the River Avon Country Park but request that the minimum area of the extension required (as set out in the concept plan) is specified within the policy.</p>	Natural England.
<p><b>Extension of the River Avon Country Park:</b> Support requirements relating to the expansion the River Avon country park, improvements to green and blue infrastructure across the site, and buffer zones, which will be reflected in the masterplan.</p>	Wiltshire Council (as landowner).
<p><b>Welcome improvements to cycling and walking and GI infrastructure, but given the scale of the proposed development, there should be greater strategic ambition:</b> For improvements for nature and public access along the River Avon corridor from Chippenham to Lacock and beyond.</p>	National Trust.
<p><b>Bullet Point 7 Protection of former canal route</b></p>	
<p><b>Policy 7 only protects the route and given the size of the allocation, development should fully restore this section of the canal from A4 to Naish Hill through financial contributions:</b> Amended criteria wording suggested and amendments to Figure 4.1 and Figure 4.2</p>	Wiltshire, Swindon & Oxfordshire Canal Partnership; Individuals x10.
<p><b>Bullet Point 9 Ecology</b></p>	
<p><b>This requirement is premature:</b> This is because master planning informed by future ecological surveys should dictate the precise composition and location of habitats within the site.</p>	Gleeson Land (Planning Manager).
<p><b>Bullet Points 10 and 11 Heritage Impact</b></p>	
<p><b>Further heritage assessment work required:</b> Assess how the heritage assets might be affected and measures to ensure harm is minimised and benefits optimised.</p>	Historic England.

Key issues raised (Policy 7 - Land south of Chippenham and East of Showell Farm)	Respondent(s)
<p><b>Planning Application for Land East of Showell Farm includes heritage analysis evidence and mitigation measures that respond positively to the need to protect the heritage setting of Showell Farm:</b> This has directly informed the masterplan in this part of the site. The provision of a community orchard along the site frontage, framed and contained within land that is already defined by a planted hedge provides a robust and appropriate response that positively responds to the setting of the Grade 2 listed Showell Farm.</p>	Hallam Land Management.
<p><b>Concerned about the negative impact on the setting of Lacock and Showell Farm listed buildings:</b> The site falls outside the limits of development for Chippenham and is located in Lacock Parish. It is of great historic significance and the negative impacts of such proposed development on the listed buildings and the setting of Lacock should not underestimated.</p>	Individuals x10.
<b>Land Contamination</b>	
<p><b>Include a detailed land contamination assessment within the mitigation measures:</b> The land north of the Sewage Works between the River Avon and Pewsham Way is historical former landfill site. Amend the policy to include within the mitigation measures a detailed land contamination assessment.</p>	Environment Agency.
<b>Omission Sites</b>	
<p><b>Omission sites have been promoted including:</b></p> <ul style="list-style-type: none"> <li>• Land North of Stanley Lane</li> <li>• Gate Farm</li> <li>• East Chippenham</li> <li>• Land South of Showell Farm</li> <li>• Land West of Chippenham</li> </ul>	David Wilson Homes(North of Stanley Lane); David Wilson Homes (Gate Farm);Chippenham Riverside (Formerly Chippenham 2020); Telling Family and Wiltshire College; L&Q Estates; Bloor Homes.
<p><b>Reassess sites in Calne and Chippenham in the context of specific constraints and priorities for both settlements:</b> Reconsider the balance of housing between the two settlements on the basis of the findings.</p>	Feltham Properties Ltd.
<b>Flood Risk</b>	
<p><b>This allocation should be removed until the sequential test is shown to be passed.</b></p>	Environment Agency.



Key issues raised (Policy 7 - Land south of Chippenham and East of Showell Farm)	Respondent(s)
<p><b>Concerns raised about potential flood risk on the site and downstream at Lacock and Reybridge including:</b> The floodplain and requirement for sequential testing has been ignored and is not considered to be a significant issue. It will have an effect on the Sewage Treatment work, Lacock and Reybridge. Reduce the housing requirement to allow the flood plain to be retained.</p>	Individuals x10; Councillor x1.
<p><b>Concerned the plan hasn't considered the effect of development on potential for River Avon to flood:</b> Object to 15ha employment due to the increased hardstanding resulting in an increased risk of flooding: Delete the employment land.</p>	Lacock Parish Council.
<p><b>There is no evidence how effective SUDs are, both in flood and pollution control:</b> They alter the hydrology of the land or affect the existing ecology and how biodiversity net gain would be achievable.</p>	Save Chippenham.
<p><b>An environmental assessment, site assessment, site survey and technical work for the western part of the site is available:</b> Provided as part of the planning application.</p>	Hallam Land Management.
<p><b>Site Selection Stage 4 Place Shaping Priorities Assessment</b></p>	
<p><b>Amendments to PSPS3 and PSP5 assessment scores suggested:</b> PSP3 River Corridor is an important blue green corridor and should be assessed as negative impact, not positive; PSP5 New Road is likely to result in a higher flow of traffic from west to east along the A4, having an adverse impact on congestion and air quality in Calne.</p>	Calne Without Parish Council
<p><b>Policy 7 Paragraph 1 Housing Requirement Figure</b></p>	
<p><b>Reduce the Housing Requirement Figure:</b> This should be to reflect the objectively assessed housing need.</p>	Lacock Parish Council.
<p><b>The proposed housing and employment requirement figures are too high :</b> It is not justified. It does not cater for local needs and does not achieve the aims in a suitable or sustainable way. It compromises greenspace and bulldozes through greenbelt land, which should be protected. It is environmentally damaging, unsustainable and ineffective.</p>	Individuals x10.
<p><b>Use the latest household projection based estimate of need as a starting point to calculate housing need. The site allocation is more than residual homes required in the Plan period and should be reduced:</b> The Town Council consider household projection to be more reflective of Wiltshire's true housing needs. Use this approach in preference to the existing standard method. The site allocation is more than the residual homes required for the Plan period. Include a windfall allowance and increase brownfield land likely to come forward for residential development in Chippenham over the Plan period. The reduction in the site allocation housing</p>	Chippenham Town Council.

Key issues raised (Policy 7 - Land south of Chippenham and East of Showell Farm)	Respondent(s)
figure would allow the size of this site on greenfield land to be reduced and would likely affect the list of infrastructure and mitigation requirements, for example a new link road may not be necessary. Do not identify areas of development for the next plan period. Identify land required for this plan period only.	
<b>Simply allocating employment land does not guarantee employers will locate there or attract the skilled employment opportunities to allow people to live near where they work:</b> The proposal does not appear sufficient to support the new 'sustainable communities' being proposed, when compared to the 26.5ha of employment land required under the current Core Strategy and where fewer houses were being proposed. This is unsound and requires further evidence.	Individuals x10.
<b>The plan doesn't state how it will benefit existing residents and there is no need for a huge expansion:</b> It has been singled out because it has the most employment, but the reality is people commute or work from home and that will not change with the new area. Distribute housing more evenly around other settlements and create more employment in areas with suitable existing infrastructure, utilising existing brownfield sites and minimising environmental damage.	Individuals x10.
<b>Have significant concerns about the scale of growth at Chippenham and Melksham:</b> Specifically regarding the impact of large scale development on the wider setting of Lacock.	National Trust.
<b>South West Chippenham will continue to provide housing stock beyond the plan period:</b> However, a detailed delivery trajectory or explanation explaining this is missing and there is no evidence to show it can be relied upon to provide homes as envisaged.	David Wilson Homes (North of Stanley Lane).
<b>Allocate the full 4000 homes with infrastructure to achieve better sustainability and placemaking outcomes:</b> To reflect the fact that a proportion of the allocation would come forward post 2038 without compromising on the opportunities provided by a strategic allocation of this scale. This would ensure infrastructure is planned comprehensively, delivered when required, costs shared across a greater number of dwellings. A collective masterplan for the whole site allocation has been prepared and informed by previous public consultation.	Gallagher Developments Ltd; Wiltshire Council as landowner.
<b>Policy 7 Paragraph 1 Employment Land Requirement</b>	
<b>Objections raised to the amount of new employment land proposed within the site:</b> Alternative proposals include to locate employment land to the north and west of the town at M4 Junction 17 or to increase employment supply at Calne and replace employment land at Chippenham with more housing.	
<b>Object to 15ha employment land. Locate employment land elsewhere:</b> The work carried out so far by the developers includes a considerably lower quantum of employment land because the most appropriate location for employment is to the north and west of the town.	Gleeson Land (Planning Manager); Gleeson Land.

Key issues raised (Policy 7 - Land south of Chippenham and East of Showell Farm)	Respondent(s)
<p><b>Delete 15ha employment land and replace with more housing to boost supply:</b> There is no evidence to support employment land and the plan is not positively prepared or effective. The plan identifies a shortage of supply in Calne whilst the ELR identifies a potential oversupply in Chippenham which fundamentally points to a need to allocate land away from Chippenham rather than within it. Analysis of Employment Land Review by Avison Young provided.</p>	Hallam Land Management.
<p><b>The council welcomes the allocation of employment land in conjunction with housing development:</b> Along with the provision of walking and cycling links, this will allow opportunities for residents to walk or cycle to work. The provision of employment locally reduces the need for 'out commuting' and the location provides a good onward connection to the M4 via the A350. Locally located employment is a key means of reducing individual car journeys and by association carbon emissions and tackling climate change.</p>	Wiltshire Council (as landowner).
<p><b>Paragraph 1 Housing Types</b></p>	
<p><b>Self Build housing is missing:</b> There should be a clear commitment to supporting this type of housing.</p>	Individuals x10.
<p><b>Figure 4.2 Concept Plan</b></p>	
<p><b>Supports arranging development as compact areas around well located local centres, providing a sense of place and functionality:</b> In his way it will encourage more active and sustainable travel choices within the town. Growing Chippenham in this way will ensure that connections between neighbourhoods are both maintained and enhanced. Importantly, by helping strengthen the recreational role of the River Avon and the river area within the heart of Chippenham, opportunities exist to establish a strong relationship with open space for all residents in the town and in its future growth.</p>	Wiltshire Council (as landowner).
<p><b>Infrastructure and mitigation measures identified as being unnecessary or missing from the concept plan and proposed amendments to the Concept Plan include:</b></p> <p>Unnecessary items: Local Equipped Play areas;</p> <p>Missing items: Off site transport connections to the town centre, railway station and hospital; health services; renewable solar energy</p> <p>Proposed Amendment: Increase Wilts and Berks Canal corridor buffer.</p>	Individuals x10; Cycle Chippenham; Go South Ltd; Chippenham Town Council.
<p><b>The concept plan does not align with the Chippenham Neighbourhood Plan Design Guide:</b> The blanket density 35dph is dense and does not leave much scope for gardens for food or biodiversity. Better to ensure a mix of densities. Should be dealt with by the Chippenham Neighbourhood Plan</p>	Individuals x10.

Key issues raised (Policy 7 - Land south of Chippenham and East of Showell Farm)	Respondent(s)
<p><b>The site is ecologically sensitive with wonderful views. The masterplan does not accurately how effective mitigation would be:</b> There is no accurate baseline ecological assessment and no evidence to show how effective mitigation would be.</p>	Save Chippenham.
<p><b>Delete or simplify Figure 4.2 Concept Plan. The concept plan is not justified by a robust and credible evidence base:</b> The concept plan hasn't been designed in accordance with either the draft Wiltshire Design Guide or the draft Chippenham Neighbourhood Plan Design Guide. There is no evidence of local community participation and others including the Town Council being involved in meaningful discussion and the design of the concept plan. There is no robust evidence base to explain the rationale and design choices of the concept plan, taking into consideration existing site constraints and environmental, ecological and landscape visual impact assessments.</p>	Chippenham Town Council.
<p><b>The concept plan is too detailed and isn't necessary in advance of a planning application with a full masterplanning exercise:</b> There is the need for flexibility in the masterplan to respond to local market conditions that might effect viability of the development.</p>	Gleeson Land (Planning Manager)' Gleeson Land; Gallagher Development Ltd; Hallam Land Management Wiltshire Council (as landowner).
<b>Local Centre</b>	
<p><b>Supports the inclusion of a 'local centre' subject to retaining some flexibility on its location :</b> Provides a focal point for local residents that includes community infrastructure alongside small scale commercial provision. Request that the location of the local centre remains flexible to ensure sustainable employment is provided locally.</p>	Wiltshire Council (as landowner).
<b>Education</b>	
<p><b>Supports the provision of education settings, subject to the location remaining flexible to optimise their accessibility, enabling walking and cycling:</b> Concerned that safeguarding a site for a secondary school will leave a "hole" in the development. Suggest that a site is located instead on the periphery of the site.</p>	Wiltshire Council (as landowner).
<b>Green and Blue Infrastructure</b>	
<p><b>Supports the provision of landscape and green and blue infrastructure:</b> Identified through Policy 7</p>	Wiltshire Council (as landowner).
<b>Collaborative Working</b>	
<p><b>The consortium have confirmed they are working collaboratively:</b> Have provided a memorandum of understanding. This position was formalised by Wiltshire Council Cabinet in December 2022</p>	Gleeson Land (Planning Manager); Gleeson Land; Hallam Land Management; Gallagher Developments; Wiltshire Council (as landowner).

Key issues raised (Policy 7 - Land south of Chippenham and East of Showell Farm)	Respondent(s)
<b>County Farms</b>	
<b>Objections to the loss of farms located within the site:</b> Exploitation of publicly owned county farms for short term financial gain and livelihood of the tenants will not be protected.	Individuals x10.
<b>Climate</b>	
<b>The development should include carbon targets:</b> In view of the loss of greenfields, any proposal would need to be rigorously holistically sustainable with ambitious and absolute sustainability energy and carbon targets for operational carbon and embodied carbon. These targets should be defined and agreed at the outline planning stage.	Individuals x10.
<b>Land East of Showell Farm Planning Application</b>	
<b>The Land East of Showell Farm planning application submitted highlights the lack of a clear and coordinated approach regarding the proposed allocation:</b> Lack of certainty of housing delivery, and questions raised regarding the deliverability of the Policy 7 infrastructure requirements.	L&Q Estates.
<b>Air Quality and Light Pollution</b>	
<b>Concerns raised about site location near to Sewage Treatment Works;</b> Concerns relate to smells emitted by Sewage Treatment Works experienced across Pewsham area.	Individuals x10.
<b>Concerns raised about potential risk of an enhanced light glow in the night skies to the north of Lacock:</b> Add a requirement to address this. [Criteria wording suggested]	National Trust.
<b>Site Selection</b>	
<b>The site is the least logical extension to the town:</b> It is not sustainable, will do untold damage to the landscape reducing the existing rural, physical and visual separation between Chippenham, Old Derry Hill, Lacock and Naish Hill.	Individuals x10.

Table 5.19 [Policy 8 - Chippenham Town Centre] key issues

Key issues raised (Policy 8 - Chippenham Town Centre)	Respondent(s)
<b>Town Centre</b>	
<b>Support for Policy 8:</b> Supports first paragraph, supports Policy 8 pedestrian and cycle links, Supports opening up development opportunities at Bath Road and and frontage development opportunities at Emery Gate.	Chippenham Town Council.
<b>Historic Environment</b>	
<b>Historic Environment:</b> Refer to these sites being within the Chippenham Conservation Area and the positive influence the designation should have on future proposals.	Historic England.
<b>Cycling</b>	
<b>Cycling improvements missing:</b> Improvements to cycling links are not mentioned in Bath Road and Bridge Centre Site Bullet Point 2 and Emery Gate Shopping Centre Bullet Point 4. This is not in accordance with NPPF. [Amended wording suggested]	Cycle Chippenham.
<b>Comparison Shopping</b>	
<b>Paragraph 4.38 is not justified because it does not make reference to evidence or support for the independent sector in Chippenham:</b> It does not recognise independent businesses on New Road and Union Road and the formation of the Town Quarters, even though they are shown on Figure 4.3. Amend Paragraph 4.38.	Chippenham Town Council.
<b>Chippenham Neighbourhood Plan</b>	
<p><b>Lack of reference to Chippenham Neighbourhood Plan policies and proposals:</b></p> <ul style="list-style-type: none"> <li>• Paragraph 4.39 does not refer to Neighbourhood Plan evidence and Policy TC1 parameters plan;</li> <li>• Reference to Chippenham Neighbourhood Plan Policy TC3 and parameters plan is missing from Paragraph 4.41 and elsewhere in the plan;</li> <li>• Protect and enhance Island park for the movement of wildlife in accordance with Chippenham Neighbourhood Plan Policies GI3 and TC2. Amend Bullet points 3 and 5 with caveat that any redevelopment is sympathetic to the existing environment and recognises and seeks to protect and enhance the special characteristics of Island Park.</li> </ul>	Chippenham Town Council.
<b>River Avon</b>	

Key issues raised (Policy 8 - Chippenham Town Centre)	Respondent(s)
<b>Reflect Paragraph 4.42 wording within Policy 8:</b> Paragraph 4.42 alludes to the project already underway to improve the River Avon including re-evaluation of the radial weir gate structure.	Environment Agency.
Paragraph 4.42 refers to the riverfront area. There is a danger inappropriate leisure activities may be supported on part of the riverfront where this is not appropriate because of environmental, ecological or heritage impacts. Delete Paragraph 4.42 or align with with Chippenham Neighbourhood Plan Policy TC2 proposals.	Chippenham Town Council.
<b>Car Parking</b>	
<b>Mitigate for loss of car parking at Bath Road Car Park:</b> Bath Road Car Park provides car parking for parents of children who attend Ivy School, which has no alternative car parking available. If modified, provide safe alternatives. Also, adding more retail units with a high rate of unused retail units already within the town centre will not help.	Individuals x10.
<b>Bath Road and Bridge Centre Site</b>	
<b>Including residential uses will increase vulnerability on the site:</b> Unless the sequential test has been passed for this site, include this change in vulnerability in the policy. Either remove residential uses, delete the site or undertake a Level 2 SFRA.	Environment Agency.
<b>Emery Gate Shopping Centre</b>	
<b>Safe access and escape must be achieved:</b> Emery Gate falls partially within flood zones 2 and 3. Subject to the sequential test been passed for this site, include wording to ensure that safe access and escape for the residential uses on upper floors is achieved.	Environment Agency.
<b>Use of the word "anchor" is ambiguous: Amend Policy 8 to remove this word to allow greater flexibility.</b> Acorn is currently undertaking feasibility work on a comprehensive rebuild approach at Emery Gate due to the inefficient existing layout and limited architectural contribution the building brings to the surrounding area. Revise the boundary to include the servicing area: [Wording amendments suggested].	Acorn Property Group.
<b>Railway Station and Cocklebury Road Area</b>	
<b>Policy 8 and Paragraph 4.43 are too vague about the type of investments proposed and would not be effective:</b> There is no evidence base. Delete this section or include sites rather than a large area.	Chippenham Town Council.
<b>Figure 4.3 and Appendix E Figure E2 Primary Shopping Area</b>	

Key issues raised (Policy 8 - Chippenham Town Centre)	Respondent(s)
<p><b>Does not adequately reflect the vitality and viability of the present town centre nor that a town centre should continue to grow:</b> Expand the boundary to the north and south to include Upper and Lower Market Places, Timber Street, Union Road, Old Road and Upper New Road.</p>	<p>Chippenham Town Council.</p>



Table 5.20 [Policy 9 Calne Market Town] key issues

Key issues raised (Policy 9 - Calne Market Town)	Respondent(s)
<b>Chippenham Housing Market Area (HMA) and strategy for Calne</b>	
<b>HMA housing strategy:</b> The distribution of housing numbers between and within the HMAs is challenged as not considering needs and not being an appropriate strategy.	Individual x10.
<b>Housing shortfall in the Chippenham HMA:</b> The current strategy could lead to a significant housing shortfall across the wider HMA, particularly given the reliance on the strategic housing delivery at Chippenham. A more effective strategy would be a dispersed spatial strategy allocating additional sites at the Market Towns in the HMA, including Calne.	Hills Homes; Robert Hitchens Ltd.
<b>HMA distribution:</b> The Chippenham HMA should accommodate at least an additional 3,252 dwellings. These should be accommodated in accordance with the towns which have the capacity like Calne and not at constrained towns or by increasing the distribution to the rural areas.	Robert Hitchens Ltd.
<b>Over-reliance on Chippenham within the HMA:</b> Imbalance in housing allocation between Chippenham and Calne. A large allocation at Chippenham has detrimentally informed the rigour and objectivity given to the assessment of Calne. Sites in Calne and Chippenham should be reassessed and the balance of housing between the two settlements should be reconsidered.	Feltham Properties Ltd.
<b>Level of growth at Calne should be higher</b>	
<b>Higher housing growth at Calne required:</b> The strategy within the Chippenham HMA is flawed and there is a need and opportunity for higher housing growth at Calne	Hills Homes; Persimmon Homes Wessex.
<b>Suitable location for higher level of growth:</b> As a market town that has potential for significant sustainable growth, Calne is well placed to accommodate further residential development and address Wiltshire's historic unmet housing need.	Gleeson Land; Persimmon Homes Wessex; Go South Coast Ltd.
<b>Scale of growth too low:</b> Object to the low 'scale of growth' for Calne as it is not justified by the evidence and is not positively prepared. The scale of growth at Calne should be increased.	Valencia Waste Management Ltd.
<b>Balance of housing and employment:</b> The approach to provide a more balanced growth between housing and employment is not justified. The 'Planning for Calne' Paper demonstrates that the town has substantial capacity and available sites to accommodate additional housing in conjunction with the planned supply of employment land.	Hills Homes; Robert Hitchens Ltd; Persimmon Homes Wessex; Go South Coast Ltd.

Key issues raised (Policy 9 - Calne Market Town)	Respondent(s)
<p><b>Development can support place shaping priorities:</b> Development at Calne can support the place shaping priorities, being well connected to the town centre and promoting sustainable travel. Options for higher growth should be considered to support the delivery of infrastructure to relieve congestion in the town centre and Air Quality Management Area (AQMA).</p>	<p>Robert Hitchens Ltd; Persimmon Homes Wessex; Go South Coast Ltd.</p>
<p><b>Lack of affordable housing provision:</b> The strategy is not positively providing affordable housing at Calne (with a significant reduction expected in the latter part of the plan period) and this could have social and economic consequences which do not appear to have been appropriately considered.</p>	<p>Hills Homes.</p>
<p><b>Scale of growth will not address town centre issues:</b> The scale of growth for Calne proposed would be inadequate to address town centre congestion and associated poor air quality.</p>	<p>Hills Homes; Persimmon Homes Wessex; Go South Coast Ltd.</p>
<p><b>Increased scale of growth to maintain market town role:</b> An increased scale of growth at Calne will enable an achievable scale of growth at Chippenham and it would support and maintain Calne's position as a Market Town.</p>	<p>Hills Homes; Persimmon Homes Wessex.</p>
<p><b>Availability of land:</b> The services on offer and land available in the Strategic Housing and Economic Land Availability Assessment (SHELAA) suggest Calne can accommodate significant and sustainable growth.</p>	<p>Hills Homes.</p>
<p><b>Development 'held back':</b> The level of growth at Calne is "held back" pending further assessments and the level of growth is reduced to that below the Core Strategy. This does not reflect the need to boost housing supply or reflect the role of Calne as a market town and its potential for growth.</p>	<p>Robert Hitchens Ltd; Persimmon Homes Wessex; Feltham Properties Ltd; Go South Coast Ltd.</p>
<p><b>Core strategy level of growth was higher:</b> Historic rates of delivery demonstrate Calne can accommodate higher levels of growth. Whilst these historic rates were higher than envisaged within the Core Strategy, this represents a failure of the Core Strategy Spatial Strategy, rather than providing a sound basis upon which to curtail future growth at Calne.</p>	<p>Persimmon Homes Wessex.</p>
<p><b>Plan period extension:</b> Plan period needs to be extended to 2040 or 2041 and there will be an insufficient supply of housing in the Chippenham HMA. This will require an increase in the number of homes allocated.</p>	<p>Hills Homes, Robert Hitchens Ltd.</p>
<p><b>Few environmental constraints:</b> Calne is not significantly constrained in environmental terms when compared to other towns in the area, it could therefore accommodate a higher level of growth. Further growth of Calne provides the town with the potential to improve the range of services and facilities in the town centre.</p>	<p>Gleeson Land; Persimmon Homes Wessex; Feltham Properties Ltd; CG Fry &amp; Son Ltd; Valencia Waste Management Ltd.</p>

Key issues raised (Policy 9 - Calne Market Town)	Respondent(s)
<p><b>Small/medium sites:</b> A higher level of growth is needed to maintain mixed-tenure housing delivery in the Chippenham HMA. Medium sized sites will be needed earlier in the plan period to maintain a supply of new housing and will assist in providing more housing choice by Small and Medium-sized Enterprise (SME) builders in the context of Wiltshire housing market having been dominated by the Public Limited Company (PLC) volume home builders.</p>	CG Fry and Son Ltd.
<p><b>Level of growth at Calne should be lower</b></p>	
<p><b>Further growth should be considered at the next plan review:</b> Any further housing growth should be considered under the next review of the plan.</p>	CPRE.
<p><b>Base date:</b> Setting the base date of the plan as 2020 (2016 was used in the 2021 consultation) produces a biased representation of current housing delivery. The Wiltshire Local Plan has not taken into consideration the exceptional growth of Calne during the last 16 years, and by setting the base date as 2020 a number of recent developments have been excluded. This has significantly contributed to the high residual balance.</p>	Calne Without Parish Council; Individuals x10.
<p><b>Impact on traffic and air quality:</b> The scale of development identified does not reflect the town's challenges and restraints related to Air Quality, traffic congestion and HGV traffic movements.</p>	Individuals x10.
<p><b>Minimal housing need:</b> There are minimal and narrow ranging housing needs in Calne demonstrated by the fact that the town has already over delivered its housing target and the housing delivered has been predominantly 3- or 4-bedroom market houses which do not meet the affordable housing requirement. Further significant growth for the town would not deliver any positive benefits as the employment growth has slowed.</p>	CPRE.
<p><b>Neighbourhood Plan Requirements</b></p>	
<p><b>Neighbourhood plan housing requirement:</b> The neighbourhood plan housing requirement is not justified and does not take into account housing completions and commitments for the plan period, specifically the amount already supplied on sites of less than 1 hectare. If the neighbourhood plan requirement was 10% of the residual amount it would be 60 houses. If the neighbourhood requirement looked at the current commitments and completions in detail it would find that sites of less than 1 hectare already account for 136 houses.</p>	Individuals x10.
<p><b>10% figure:</b> There is no justification for the neighbourhood plan requirement being 10% of the overall housing requirement.</p>	Robert Hitchens Ltd.
<p><b>Monitoring neighbourhood plans:</b> If additional housing provision is to be met through the Calne Neighbourhood Plan, there needs to be a mechanism to ensure that the housing growth required will be delivered through Neighbourhood Plans as there is no timescale set within which one must be prepared.</p>	Hills Homes.

Key issues raised (Policy 9 - Calne Market Town)	Respondent(s)
<p><b>Relationship of overall requirement and neighbourhood plan requirement:</b> A neighbourhood plan requirement should be on top of the housing requirement as the preparation of neighbourhood plans is optional therefore the source of supply is less reliable and inconsistent with paragraph 71 of the NPPF. "Planning for Calne" paragraph 91 states that the neighbourhood area requirement may be delivered over one or more iterations of a neighbourhood plan period within the Local Plan period. An objection is made to this statement as neighbourhood plans are voluntary - consequently there is no certainty that a neighbourhood plan will be prepared or reviewed within the plan period.</p>	Robert Hitchens Ltd.
<p><b>Market town role</b></p>	
<p><b>Support for Market Town role:</b> Support the retention of Calne being identified as a Market Town. This is reflective of the level of facilities and services within the settlement which supports the achievement of a sustainable pattern of growth.</p>	Castlewood Properties Ventures Ltd; Persimmon Homes Wessex; CG Fry & Son Ltd.
<p><b>Support for Policy 9:</b>Support for draft policy 9 which seeks to foster sustainable development in Calne while preserving its distinctive character, sustainability, and overall quality of life.</p>	Gleeson Land.
<p><b>Settlement boundary:</b> Figure 4.4 (Calne Policies Map) shows the extent of the settlement boundary for Calne, but this excludes development to the east of Calne, keeping these areas outside of the settlement boundary. There is no justification for this approach, and it is inconsistent with the methodology for settlement boundaries, as presented at Appendix B to the Local Plan.</p>	Persimmon Homes Wessex.
<p><b>Employment</b></p>	
<p><b>Lack of employment opportunities:</b> The lack of suitable employment opportunities in Calne has resulted in approx. 40% of those employed travelling more than 5km to work.</p>	Calne Without Parish Council.
<p><b>Wilts and Berks Canal</b></p>	
<p><b>Reference to the Wilts and Berks Canal:</b> The Calne Branch of the Wilts &amp; Berks Canal as shown on the policies map connects the main line of the canal at Stanley to the heritage canal feature in Castlefields Canal &amp; River Park. The protection and support for this branch in Policy 94 Wiltshire's Canals and the Boating Community should be reflected in the policy for Calne. Policy wording amendment proposed by the Representor as well as the addition of the canal route to Figure 4.4 Calne policies map.</p>	Individual x10.
<p><b>Infrastructure</b></p>	

Key issues raised (Policy 9 - Calne Market Town)	Respondent(s)
<b>Major infrastructure improvements:</b> The plan has concluded that opportunities for major infrastructure improvements at Calne to address matters related to congestion and air quality will not be resolved within this plan period. This runs counter to the NPPF (paragraph 22) which requires strategic policies to anticipate and respond to long-term opportunities.	Persimmon Homes Wessex; Feltham Properties Ltd; Go South Coast Ltd.
<b>Contrast to infrastructure provision at Melksham:</b> The Local Plan avoids the consideration of long-term major infrastructure delivery at Calne (and associated housing provision). This is in contrast to the approach at Melksham and its proposed Broad Location for Growth.	Persimmon Homes Wessex; Feltham Properties Ltd; Go South Coast Ltd.
<b>Link road A4 to A3102:</b> Options for higher growth should be considered to support the delivery of infrastructure, in particular a link road between between the A4 and A3102 to relieve congestion in the town centre which already adversely affects the operation of bus services in the town.	Go South Coast Ltd.
<b>Cemetery:</b> Concern that there has been no attempt to find a site for a new cemetery.	Individual x1.
<b>Calne Air Quality Management Area (AQMA)</b>	
<b>Impact on Calne AQMA:</b> The Calne AQMA strategy provides little that will have an impact. While acknowledging this is difficult, allocating an additional 1230 homes will make the air quality worse. No assessment is made of the impact on air quality in Calne of the large planned development to the south of Chippenham.	Sustainable Calne.
<b>Healthcare</b>	
<b>Healthcare provision:</b> New development should make a proportionate contribution to funding the healthcare needs arising from new development. The area strategies for the Market Towns where a significant level of housing growth is proposed should take a more consistent approach to reflecting the additional healthcare infrastructure required to support the level of proposed growth. [Policy 9 wording amendment proposed by the Representor].	NHS Bath And North East Somerset; Swindon And Wiltshire Integrated Care Board.
<b>Lack of medical facilities:</b> Calne is not balanced regarding employment and housing and has a lack of medical facilities. The anticipated medical centre on Silver Street shows no sign of commencement.	CPRE; Individual x10.
<b>Transport</b>	
<b>Impact on strategic road network (SRN):</b> Whilst we consider that the scale of planned growth as proposed does not represent a significant increase on that committed through the 2015 Core Strategy and existing commitments, the potential cumulative impacts for the SRN are not sufficiently evidenced at this stage. Additional allocations are identified for Calne, Corsham, Devizes and Melksham which could potentially impact traffic demand via the A350 corridor and M4 J17.	National Highways.

Key issues raised (Policy 9 - Calne Market Town)	Respondent(s)
<p><b>Bus services:</b> Development east and southeast of Calne can support the place shaping priorities, being well connected to the town centre and promoting sustainable travel. It would help justify improvements in frequency to Stagecoach service 55, allowing a much larger proportion of existing as well as future residents to have direct public transport access to both Swindon and Wootton Bassett, and to Chippenham, as this would allow that service to operate within much of Calne as two half-hourly branches.</p>	Go South Coast Ltd.
<b>Site selection process</b>	
<p><b>Amalgamating sites:</b> Site 4 is an amalgamation of SHELAA sites 3642, 487, 1104a, 1104b and 1104c. No consideration was given to disaggregation of Site 4 and this raises doubt over the assessment. When sites are aggregated it should improve the sum of the parts. Where it becomes apparent that such a measure is ineffective, in positive plan making terms, this should be reversed. An important section of site 4 (SHELAA site 1104b) was also removed at a late stage from site assessment for no reason.</p>	Feltham Properties Ltd.
<p><b>Provision of a road link:</b> The allocation of 'site 4' for strategic scale of housing development can help provide a large component of a new road link to the southeast of Calne, potentially continuing the link being constructed north of Low Lane through to Quemerford.</p>	Valencia Waste Management Ltd; Whinney and Keeping Partnership.
<b>Omission sites</b>	
<p>The following sites, that have already been assessed though the site selection process, were promoted as omission sites:</p>	
<ul style="list-style-type: none"> <li>• SHELAA sites 1104a, 1104b (part of site 4): Site 4 in Calne is capable of delivering the highway infrastructure necessary to deliver improvements at Calne. It was rejected and the assessment is flawed as a result of procedural inaccuracies. A site comprising of parcels 1104a and 1104b only would have been more suitable for allocation and would have scored better against Sustainability Appraisal (SA) / Place Shaping Priorities (PSP) objectives.</li> </ul>	Feltham Properties Ltd.
<ul style="list-style-type: none"> <li>• South of Low Lane, Calne (part of site 4): Land controlled by Persimmon Homes, alongside additional land at Site 4 can provide for a scale of development that would support the delivery of significant infrastructure, specifically, a road link via road connections from the south at the A4 with recently constructed development to the north.</li> </ul>	Persimmon Homes Wessex.
<ul style="list-style-type: none"> <li>• Land at Quemerford (part of site 4): Concern about the Stage 4 assessment and challenges could be addressed through mitigation or appropriate urban design approaches.</li> </ul>	Whinney & Keeping Partnership.

Key issues raised (Policy 9 - Calne Market Town)	Respondent(s)
<ul style="list-style-type: none"> <li>SHELAA site 3642 (part of site 4): The allocation of the site would support the emerging case for improved transport infrastructure.</li> </ul>	Valencia Waste Management Ltd.
<ul style="list-style-type: none"> <li>Land south of Marden Farm, Calne (site 10).</li> </ul>	Gleeson Land.
<ul style="list-style-type: none"> <li>Land at Wenhill, Calne (site selection site 7, SHELAA sites 709, 3251, 3311 and 3312): There is an error in the Sustainability Appraisal of the site. The site was assessed as having potential for 500 units but is being promoted for 200 dwellings. Sufficient smaller/medium sized sites should be identified the Chippenham HMA where the deliverability of large-scale strategic sites is both technically and politically challenging.</li> </ul>	CG Fry & Son Ltd.
<ul style="list-style-type: none"> <li>Land north of Low Lane, Calne.</li> </ul>	Hills Homes.
<ul style="list-style-type: none"> <li>Land off Spitfire Road, Calne (part of site 3, SHELAA 488): It is unclear why this site has not been included. It is illogical bearing in mind land to the east of the site and to the north are proposed for development in the plan period.</li> </ul>	Robert Hitchens Ltd.

Table 5.21 [Policy 10 - Land off Spitfire Road, Calne] key points

Key issues raised (Policy 10 Land off Spitfire Road, Calne)	Respondent(s)
<b>Support for the allocation:</b> Land to the north-east of Calne (north and south of Abberd Lane) is considered to represent an unconstrained and sustainable direction for growth. It is well related and connected to the town centre, employment and retail areas to the north and to the A3120 Oxford Road corridor.	Robert Hitchens Ltd, Go South Coast Ltd
<b>Objection to the allocation:</b> The proposed site is in open countryside outside Calne's settlement boundary and is close to a waste recycling centre with associated pollution (noise, light, odour). The site is prone to flooding. It sits between Calne and the North Wessex Downs AONB. The policy should be deleted.	Individuals x10.
<b>Employment land:</b> Concern that employment uses will not end up being delivered, and the site will come forward for housing instead.	Individuals x10.
<b>Delivery of Policy 9:</b> The allocation in Policy 10 does not deliver any of the items identified in Policy 9.	Individuals x10.
<b>Infrastructure</b>	
<b>Lack of social infrastructure:</b> The developments proposed in Policies 10 and 11 contribute no new social infrastructure (such as shops, community spaces, primary schools, nurseries or medical centres).	Calne Without Parish Council; Individual x10.
<b>Burial ground:</b> There is no consideration of provision for a burial ground.	Individuals x10.
<b>Flood risk</b>	
<b>Sequential test:</b> This site is affected by flood zones on the Abberd Brook. If the sequential test has not been passed for this site, it should be removed from the allocations list.	Environment Agency.
<b>Requirement for flood risk assessment:</b> The land identified in Policies 10 and 11 is prone to localised flooding. These policies should be updated to require any potential developer to conduct detailed flood risk assessments for both the development sites and consequential flooding elsewhere.	Calne Without Parish Council.
<b>Transport</b>	
<b>HGV movements:</b> Policy 10 will exacerbate traffic issues particularly relating to HGV movements on Spitfire Road.	Individuals x10.
<b>Public transport:</b> Land to the north-east of Calne (north and south of Abberd Lane) is well placed to benefit from improvements to bus services which are expected to route along Sandpit Road and Spitfire Road.	Robert Hitchens Ltd; Go South Coast Ltd.



Key issues raised (Policy 10 Land off Spitfire Road, Calne)	Respondent(s)
<p><b>Bus services:</b> Additional bus stops at the southern end of Sandpit Road and/or on Spitfire Road south of Abberd Lane will require delivery as part of development under Policies 10 and 11. Proportionate developer contributions to support the diversion and augmentation of this and other bus services are justified to serve Calne. These should be clearly evidenced in the Calne Transport Strategy and any local plan policies for Calne for the plan to be properly evidenced and effective.</p>	Go South Coast Ltd.
<p><b>Lack of sustainable transport links:</b> The sites identified in policies 10 and 11 are not connected to sustainable transport links to Calne town centre. They are not on a bus route and are not integrated into the main road network.</p>	Calne Without Parish Council.
<p><b>Landscape</b></p>	
<p><b>Impact on the North Wessex Downs Area of Outstanding Beauty (AONB):</b> The sites allocated in Policies 10 and 11 are located on greenfield sites between the existing town and the North Wessex Downs AONB. Such extensive development will have a detrimental effect on the view of the AONB from the west and from within the AONB looking out towards the west. Both policies should be updated to specifically say that any development in the area covered by Policies 10 and 11 should be of a scale and design to complement the views into and out of the AONB.</p>	Calne Without Parish Council.
<p><b>Calne Design Guidelines and Code</b></p>	
<p><b>Paragraph 4.56:</b> Reference to the Calne Town Centre Management Plan should be amended as the Town Centre Plan is out of date. Instead the Calne Design Guidelines and Code which have been adopted by both Calne Town Council and Calne Without Parish Council and the emerging policies of the Neighbourhood Plan Review, should be referenced.</p>	Individual x10.
<p><b>Neighbouring land uses</b></p>	
<p><b>Neighbouring land uses:</b> The list of neighbouring uses that need to be considered (covered in bullet 4 of Policy 10) is inaccurate and should include waste, minerals and industrial uses. [Policy wording amendment proposed by the Representor].</p>	Hills Group Ltd.
<p><b>Adjoining sites</b></p>	
<p>SHELAA site 488 (part of site 3) is adjacent to the allocation and should be allocated for residential development.</p>	Go South Coast Ltd.
<p>Consideration should be given to allocating land further to the south east on a strategic scale to meet both additional housing need and to support the delivery of a link road between the A4 and A3102.</p>	Go South Coast Ltd.

Table 5.22 [Policy 11 Land to the North of Spitfire Road, Calne] key issues

Key issues raised (Policy 11 - Land to the North of Spitfire Road, Calne)	Respondent(s)
<b>Support for the allocation</b>	
<p><b>Sustainable direction of growth:</b> Land to the north and south of Abberd Lane is an unconstrained and sustainable direction for growth. It is well connected to the town centre, the employment and retail areas to the north and to the A3120 Oxford Road corridor. It is well placed to benefit from improvements to bus services along Sandpit Road and Spitfire Way.</p>	<p>Robert Hitchens Ltd; Go South Coast Ltd; Castlewood Properties Ventures Ltd.</p>
<b>Objection to the allocation</b>	
<p><b>Constrained site:</b> The site is in open countryside outside Calne's settlement boundary. It is close to one of the main recycling centres in Wiltshire and the associated pollution (noise, light, odour). The site is prone to flooding. It sits between Calne and the North Wessex Downs Area of Outstanding Natural Beauty (AONB). The policy should be deleted.</p>	<p>Individuals x10.</p>
<p><b>Accessibility of the site is poor:</b> The policy is not supported because the site is not accessible to the town centre or bus interchange. Housing should be in locations where the elderly have easy access by public transport and where walking or cycling is on flat safe surfaces. Those who require affordable housing and good public transport should be within easy access of the town centre. This site has constraints for use by all age categories. The policy should be deleted and any growth for the town should be through windfall and brownfield redevelopment.</p>	<p>CPRE.</p>
<b>Masterplanning</b>	
<p><b>Open Space:</b> Recommends that the policy includes a minimum provision (hectares) for public open green space, as set out in the concept plan.</p>	<p>Natural England.</p>
<p><b>Excluded employment land in concept plan:</b> The concept plan in Figure 4.5 excludes an area of existing employment land within the central area of the concept plan. This excludes part of the proposed development of this site that is considered to form an opportunity to create holistic residential-led mixed uses that utilises good placemaking principles and makes efficient use of land. The central area of existing employment land should be identified within the concept plan.</p>	<p>Castlewood Properties Ventures Ltd.</p>
<p><b>Justification for concept plan requirements:</b> The provision of a concept plan in principle is not objected to but no evidence or supporting justification has been included within the policy to demonstrate the requirement for a local centre, or employment areas, in particular office use, to be located within the site.</p>	<p>Castlewood Properties Ventures Ltd.</p>

Key issues raised (Policy 11 - Land to the North of Spitfire Road, Calne)	Respondent(s)
<b>Requirement for a single masterplan:</b> The preparation of a single indicative masterplan, phasing and delivery strategy is an unnecessary requirement that will delay the delivery of housing and undermine the housing trajectory.	Robert Hitchens Ltd; Go South Coast Ltd; Castlewood Properties Ventures Ltd.
<b>Policy requirements</b>	
<b>Objection to self build requirement:</b> Object to the concept plan which indicates a potential area for self-build plots. It is not clear what the evidence is to support a proportion of the site being identified for self-build.	Robert Hitchens Ltd.
<b>Local centre and nursery:</b> Objection to the local centre and nursery which would be better related to existing and proposed development to the north-east of Calne if it were located within SHELAA 488.	Robert Hitchens Ltd; Go South Coast Ltd.
<b>Neighbouring land uses:</b> Policy 11 should be amended to more accurately reflect the nature of likely impacts from the neighbouring land uses associated with the waste and recycling facilities.	The Hills Group Ltd.
<b>Transport</b>	
<b>Poor access to sustainable transport:</b> The local centre and nursery are not well related to key transport corridors including the potential high quality bus corridor along Sandpit Road and Spitfire Road. The site is offset from the bulk of the residential land that is needed for it to be sustainable, which requires a population threshold arising from of at least 1400 dwellings within about a 700m radius to be commercially sustainable. The local centre should also serve as a place where the public can use multiple modes of public transport.	Go South Coast Ltd.
<b>Bus services:</b> The completion of the link road connecting Spitfire Road and Prince Charles Drive provides the opportunity for certain journeys on bus services to be re-routed from Oxford Road. This would provide convenient access to public transport and offer existing residents a sustainable alternative means of travel.	Robert Hitchens Ltd; Go South Coast Ltd.
<b>Insufficient detail on bus services:</b> There is no evidence of consultation with bus companies.	CPRE.
<b>Sustainable transport links to the town centre:</b> The sites identified in policies 10 and 11 are not connected to sustainable transport links to Calne town centre. They are not on a bus route and they are not integrated into the main road network.	Calne Without Parish Council.
<b>Sustainable transport to other towns:</b> Development at this location provides the opportunity for travel choices other than the private car with bus services accessible from Calne Town Centre to Swindon, Chippenham, Devizes and Marlborough. The site offers the opportunity to deliver a housing development in a highly sustainable location.	Go South Coast Ltd.

Key issues raised (Policy 11 - Land to the North of Spitfire Road, Calne)	Respondent(s)
<p><b>Pollution mitigation:</b> Policies 10 and 11 recognise the existing use of Spitfire Road as a major route for HGVs into Hills' recycling facility and an existing skip hire business. This traffic generates pollution (noise, odour, HGV pollution, light pollution). It is welcomed that the policies ask for development proposals to put mitigation measures in place but they are not specific about what would be acceptable.</p>	Calne Without Parish Council.
<p><b>Infrastructure</b></p>	
<p><b>Lack of social infrastructure:</b> The developments proposed in policies 10 and 11 contribute no new social infrastructure (such as shops, community spaces, primary schools, nurseries or medical centres).</p>	Calne Without Parish Council; Individuals x10.
<p><b>Lack of detail on infrastructure requirements:</b> There is no consideration of provision for a burial ground or improvements to health facilities. The allocation at Policy 11 provides for secondary school places but not primary school. The financial contribution for a nursery is welcomed but not at the expense of other facilities.</p>	Individual x10.
<p><b>Infrastructure requirements evidence:</b> Evidence should be demonstrated for why the need for a nursery or employment land cannot be accommodated elsewhere within Calne.</p>	Castlewood Properties Ventures Ltd.
<p><b>Flood risk</b></p>	
<p><b>Requirement for flood risk assessment:</b> The land identified in Policies 10 and 11 is prone to localised flooding. These policies should be updated to require any potential developer to conduct detailed flood risk assessments for both the development sites and consequential flooding elsewhere.</p>	Calne Without Parish Council.
<p><b>Landscape</b></p>	
<p><b>Impact of lighting:</b> The site is on a very visible ridge where new lighting will increase the effect of urbanisation of the open countryside.</p>	CPRE.
<p><b>Impact on the North Wessex Downs Area of Outstanding Beauty (AONB):</b> The sites allocated in Policies 10 and 11 are located on greenfield sites between the existing town and the North Wessex Downs AONB. Such extensive development will have a detrimental effect on some view in and out of the AONB from the west. Both policies should be updated to specifically say that any developments in the area covered by Policies 10 and 11 should be of a scale and design to complement the views into and out of the AONB.</p>	Calne Without Parish Council.
<p><b>Sustainability Appraisal (SA)</b></p>	
<p><b>Sustainability appraisal (SA):</b> The SA should be re-examined to more accurately reflect the specific circumstances and mitigations presented by Site 2.</p>	Castlewood Properties Ventures Ltd.
<p><b>Local guidance</b></p>	

Key issues raised (Policy 11 - Land to the North of Spitfire Road, Calne)	Respondent(s)
<p><b>Calne Town Centre Management Plan:</b> The reference in the supporting text at paragraph 4.56 to the Calne Town Centre Management Plan should be amended as the Town Centre Plan is out of date.</p>	<p>Individual x10.</p>
<p><b>Local Design Guide:</b> The Policy should reference conformance to Local Design Guides, such as the Calne Community Neighbourhood Plan Design Guide, which has been formally adopted by Calne Town Council and Calne Without Parish Council.</p>	<p>Calne Without Parish Council; Individuals x10.</p>

Table 5.23 [Insert policy number / local plan reference] key issues

Key issues raised (Policy 12 Corsham Market Town)	Respondent(s)
<b>Wording Amendments</b>	
<b>Policy 12 Criterion Point 1:</b> The list of settlements should be in alphabetical order. Additional modifications to different criterion points have been suggested by Corsham Town Council.	Corsham Town Council.
<b>Policy 12 Criterion Point 5 Modification:</b> Add 'and associated infrastructure' to the end of the sentence.	Corsham Town Council.
<b>Housing Growth</b>	
<b>The level of growth proposed is too low. Object to the reliance on small sites. Allocate further site for housing:</b> The level of growth is too low to support or fund the provision of new infrastructure such as the new railway station or a new supermarket. Either delete criteria 5 and 6 or increase the housing figures to levels set out in the Core Strategy, at build rates similar to those observed since 1996. Object to the housing provision on the grounds it has been influenced by an unsound analysis of the constraints affecting the town. Amend housing requirement to 1080 homes over the plan period, reflecting build rate of 60 dwellings per annum. The housing provision represents a strategic approach which seeks to suppress housing delivery from build rates which have been sustained for 28 years since 1996. Object to the reliance on small sites and unidentified sites.	Great Tew Bantham Estates LLP.
<b>Approach to RAF Rudloe Manor:</b> The brownfield opportunity at RAF Rudloe Manor should not have been ruled out of the site selection process for Corsham at Stage 1, as this represents a sustainable option for growth of Corsham.	Presscredit (Rudloe) Ltd.
<b>Support reduced level of development in Corsham:</b> This is because of the extent of the development that has taken place during the most recent Local Plan period. The sites proposed should respect the Rural Green Buffer. If development is to be permitted, it should be "adjacent to existing development and respect the Neighbourhood Plan Rural Buffer".	Corsham Civic Society.
<b>Support reduced scale of growth:</b> There are concerns that Corsham is singled out as being suitable for a reserve site. Do consider this feasible. Delete reserve site.	Pickwick Association.
<b>Support the proposed and reserve site in principle. Allocate the reserve site and/or Land at Brook Drive:</b> Land South of Dicketts Road can be delivered within 5 years following adoption. To contribute towards the requirement for additional homes, allocate the reserve site Land East of Leafield Trading Estate and/or Allocate Brook Drive for 50 homes for immediate delivery which would be a logical addition to the existing and committed development in Corsham. Amend the settlement boundary.	De Vernon Trustees.
<b>Underground Mining</b>	

Key issues raised (Policy 12 Corsham Market Town)	Respondent(s)
<p><b>Policy 12 Criterion 7:</b> Mining has not constrained recent development at the Copenacre site and there is no evidence to demonstrate why the presence of stone mines would be a constraint for on surface development. Hartham Park Mine extends beneath neighbouring estates and there are no existing issues which suggest the presence of the mine is a barrier to development.</p>	<p>Kier Group Ltd; Great Tew Bantham Estates LLP.</p>
<p><b>Underground mines are one of the principal constraints to development in Corsham:</b> Within mineral safeguarding areas and areas licenced for extraction of minerals, the Local Plan should contain an explicit ban on development. This is supported by the British Geological Survey Report.</p>	<p>Pickwick Association.</p>
<p><b>Bats Special Area of Conservation (SAC)</b></p>	
<p><b>Policy 12 Criterion Point 3:</b> Support the inclusion of the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) as a key environmental constraint for the locality. The requirement to protect important habitats for bats should be amended to “protect <i>and enhance</i>” important bat habitat.</p>	<p>Natural England.</p>
<p><b>Policy 12 Criterion Point 3:</b> The Bat Special Area of Conservation (SAC) blanket approach is not fully justified and there is not sufficient evidence to justify the strategy. Development Strategies should maximise housing allocations on all edge of settlement locations before considering less sustainable strategies. There are mitigation measures and further information would be provided as part of a planning application.</p>	<p>Kier Group Limited; Stuart Kotchie; Johafiky Investments Ltd.</p>
<p><b>Education</b></p>	
<p><b>Include an extra criterion:</b> To allow the delivery of funding contributions for secondary education and early years provision and expanded to include primary education.</p>	<p>Corsham Town Council.</p>
<p><b>Healthcare and Leisure Services</b></p>	
<p><b>Additional facilities:</b> Include two extra criterion for healthcare, leisure and youth services:</p>	<p>Corsham Town Council.</p>
<p><b>Policy 13 Site Allocation</b></p>	
<p><b>Amend the allocation and reserve site to be employment sites &amp; Allocate sites north of Railway Line:</b> They would not need the significant improvements to infrastructure including the upgrade to the railway bridge, additional schools and surgeries or provision of easements. These issues could also reduce housing numbers and affect viability. The costs to upgrade and improve access to Corsham, however the costs to do this would have a greater impact on viability. The viability of these sites with the site specific constraints identified have not been tested. Under delivery is likely.</p>	<p>Kier Group Limited.</p>
<p><b>Allocations (Overall)</b> - These identified allocations in Corsham could potentially impact traffic demand via the A350 corridor and M4 J17.</p>	<p>Highways England.</p>

Key issues raised (Policy 12 Corsham Market Town)	Respondent(s)
<b>Alternative Sites have been proposed for allocation:</b>	
<b>Land North of Bradford Road, Corsham:</b> Has better public transport connectivity and access to services and facilities. Can provide a green buffer through the centre of the site to retain separation between Corsham and Rudloe.	Kier Group Limited.
<b>Land North of Bath Road, Corsham:</b> Site Selection Process is flawed. Site should not have been discounted at Stage 2 of the site selection process given there are several potential ways to ensure that operations at Hartham Park Mine do not preclude development.	Great Tew Bantham Estates LLP.
<b>Land at Brook Drive:</b> Could act as a rounding off of housing in this part of Corsham.	De Vernon Trustees.
<b>Allocate Land to the West of Corsham:</b> For employment use(s)	Stuart Kotchie; Johafiky Investments Ltd.
<b>Ex Local Authority land</b> Land including garages should be considered for development as it would be more sustainable and provide affordable housing rather than executive housing.	Corsham Civic Society.
<b>Support Site removal:</b> Supports removal of Site 1 Pickwick Paddock from consideration.	Corsham Civic Society; Pickwick Association
<b>Brook Drive:</b> Allocate Brook Drive for 50 homes for immediate delivery.	De Vernon Trustees.
<b>Sustainability Appraisal (SA)</b>	
<b>Amend the allocation and reserve site Sustainability Appraisal Objective 7:</b> SA for Land at Dicketts Road and Reserve Site Land East Leafield Estate refers to the site as having a minor adverse effect upon the heritage SA Objective 7 and a 'moderate adverse' effect upon biodiversity SA objective 1. The plan includes a clear presumption in favour of biodiversity net gain and as such a 'minor' positive effect can be achieved. There are no designated heritage assets in any proximity to the area and consequently this can be changed to 'neutral'.	De Vernon Trustees.
<b>Figure 4.7 Concept Plan</b>	
<b>General Inconsistencies:</b> The concept plan differs from paragraph 4.64 which acknowledges that there could be a variety of means of delivering development on the site. Add the word "broad" in front of the wording concept plan to be more effective and flexible.	De Vernon Trustees.
<b>Green Infrastructure:</b> The amount of remaining GI on the concept plan is a typo and should be 1.4ha.	De Vernon Trustees; Corsham Town Council.
<b>Employment Land</b>	



Key issues raised (Policy 12 Corsham Market Town)	Respondent(s)
<p><b>Object to Policy 12 due to its failure to allocate any employment land in Corsham despite a clear and acknowledged need for such development:</b> Allocating a further 360 homes and a reserve site with no additional employment development will only lead to an increase in out commuting which will exacerbate the existing low levels of self containment within Corsham, contrary to the overarching aims of the plan. Transferring employment to Chippenham and Melksham instead is not an appropriate way to address the issue. Town residents would be forced to travel further than necessary to meet their needs.</p>	Stuart Kotchie; Johafiky Investments Ltd.
<b>Rural Green Buffer</b>	
<p><b>Object to the formalisation of the Corsham Green Buffer on the Corsham Policies Map at Figure 4.6.</b> Corsham Green Buffer shown is not consistent with the plan contained within the Neighbourhood Plan Figure 4 Page 24. Fig 4.6 shows an additional area of green buffer that links the area in the north west with the area to the south east. It also includes areas of Local Green Space. These are different designations with different purposes. Object to the green buffer area to the north west, which is subject to a current planning application. The buffer is a locally imposed constraint that was designated via the Neighbourhood Plan and has not been subject to the scrutiny of a borough wide local plan examination. No additional justification is made within the Local Plan. It should be fully scrutinised at this stage as to why no additional employment land is allocated within Corsham. Neither plan defines 'coalescence'. It is questionable how in its current state it serves to prevent coalescence. There is existing development which already bridges the gap between Rudloe and Corsham. Detailed analysis as to whether the designation serves a purpose would have been expected as a minimum. It is not a reason to preclude a development for which there is an identified and acknowledged need.</p>	Stuart Kotchie; Johafiky Investments Ltd.
<p><b>The map of the Corsham Neighbourhood Plan Rural Buffer policy CNP E5 is shown incorrectly in the policies map fig 4.6:</b> The north-eastern part of the MOD Corsham site is not included in the rural buffer and should be corrected.</p>	Defence Infrastructure Organisation.
<b>Flood Risk</b>	
<p><b>Flood reduction projects:</b> Include reference to the flood reduction project underway, being led by the Environment Agency, to deal with flood risk posed by a failing culvert running from Southerwicks to Stokes Road.</p>	Environment Agency.
<b>Healthcare</b>	
<p><b>Lack of identified healthcare infrastructure:</b> There is no health infrastructure identified. Consider the old Health Clinic. The Lypiad Centre, if it were surplus to MOD requirements would potentially provide a site for healthcare or affordable housing.</p>	Corsham Civic Society.
<b>Railway Station</b>	

Key issues raised (Policy 12 Corsham Market Town)	Respondent(s)
<p><b>Further development at Corsham should not be permitted until Corsham Railway Station is reopened:</b> Katherine Park was only given permission on the basis there would be a station.</p>	Corsham Civic Society.
<p><b>Brownfield Land</b></p>	
<p><b>Ban on brownfield development beyond A4:</b> Beyond the A4 road there has been a ban on development except on brownfield sites since the War. This ban should be explicitly provided in the Local Plan.</p>	Pickwick Association.
<p><b>Planning for Corsham Document</b></p>	
<p><b>Comments made about the content within the Planning for Corsham document:</b></p> <ul style="list-style-type: none"> <li>○ Paragraph 1 - Little evidence has been provided.</li> <li>○ Table 2 - Is this a statement of opinion, an established fact or an ambition.</li> <li>○ Paragraph 8 - Should be expanded to show constraint, for example Page 29 Corsham Batscape Strategy.</li> <li>○ Page 11 - Insert map of area consented for mineral extraction or Mineral Protection Areas.</li> <li>○ Paragraph 12 - In the hierarchy is the Corsham Neighbourhood Plan senior to the Local Plan? If not, shouldn't the Green Buffer also be identified and safeguarded in this document?</li> <li>○ Paragraph 14 - Illustrate with comparative maps.</li> <li>○ Paragraph 15 - Need evidence of number of employees in each sector., otherwise the narrative is meaningless.</li> <li>○ Paragraph 17 - With what objective in mind?</li> <li>○ PSP6 Provision of a second supermarket - Suggest a location somewhere near the proposed new railway station so as to divert some road traffic and pollution from the road to Melksham.</li> <li>○ PSP7 - Suggest adding in conservation areas and revising underground stone mines to read mineral safeguarding areas.</li> <li>○ Paragraph 24 - Is this a statement of the law or a pious hope? Would a developer be bound by either or both?</li> <li>○ Paragraph 27 - Mineral Safeguarding Areas - need map see 'Wiltshire and Swindon minerals core strategy key diagram'. Or - be)er s II - BGS map of Wiltshire Mineral resources. Why only the mines themselves; what about untapped resources zoned for future mining?</li> <li>○ Paragraph 31 Figure 4 - This is presumably planning for additional houses? If so, the graph should say so - the previous paragraphs deal with employment land rather than dwellings.</li> </ul>	Pickwick Association.

Key issues raised (Policy 12 Corsham Market Town)	Respondent(s)
<ul style="list-style-type: none"> <li>○ Paragraph 30 - Add 'Mineral Safeguarding Areas'.</li> <li>○ Paragraph 32 - This para jumbles dwellings and employment. Suggest re-write.</li> <li>○ Paragraph 33 - Consider including Mineral Safeguarding Areas and splitting para into several sentences.</li> <li>○ Site 1 - We welcome the decision not to take this site further. For reference it would have been helpful to name each site so they can be readily identified during public consultation</li> <li>○ Site 6 is on land licensed for mineral extraction. We also objected to inclusion of this site in 2021. We ask the Council now to delete this site for further consideration.</li> <li>○ Site 3 - We have not examined the retail study referred to, but would have thought that a supermarket south of the railway line in a newly developing area would be appropriate.</li> <li>○ Paragraph 71 - How does this section actually 'support' the Town Centre'? As drafted it simply outlines the present position and quotes from the Corsham Neighbourhood Plan. Should it go on to say 'The Local Plan supports the NP'?</li> <li>○ Paragraph 75 - Corsham Priory was a cell of the abbey of Marmouer-les-Tours during the 12th C. Suggest replace 'Benedictine Abbey' with 'Priory'.</li> <li>○ Paragraph 83 - PSP's are introduced on page 7 - ? cross reference. At present it looks as though the pages have been dra.ed without regard to earlier work.</li> <li>○ Paragraph 86 - ?envisages achieving.</li> <li>○ Paragraph 88 - 'Larges' Typo – 'Larges' should read 'large' or 'larger'? The residual requirement at para 34 is 260. Presumably the 10% (of 260 – or 360?) and 40 is the 'neighbourhood area requirement' a)ributable only to Corsham's outlying villages. If so, should be made clear in the text.</li> <li>○ Paragraph 91 - The Education Act 1996 – places a duty on Local Authorities to see that education is available for all children of compulsory school age. This para only kicks in if the expansion can be put down to - and paid for by - expansion arising from some form of development. We note that the word 'and' has been introduced since the earlier dra. and reference to 'primary school' has been deleted. This does not appear to be sensible.</li> <li>○ Paragraph 92 - Four public bus routes serve Corsham - Is this really 'well served?'</li> <li>○ Paragraph 93 - First bullet point - Is this a Trojan Horse for restrictions on the A4? Given the infrequent bus service, any restrictions would impact many more people in private vehicles than in public transport.</li> <li>○ Paragraph 94 - 1st bullet Nothing is actually set out under this bullet. What improvements are possible? What are envisaged?</li> </ul>	

Key issues raised (Policy 12 Corsham Market Town)	Respondent(s)
<ul style="list-style-type: none"> <li>○ Paragraph 96 - Needs further analysis of whether there is a problem, if so, what is the scale of that problem and how best it might be resolved. Provision of health and social care is not the prime responsibility of a developer - probably a mix of central and local government, aided by possible windfall income from developers. Need a statement of what Wilts Council is doing. Social care is not mentioned all in this paper other than in the paragraph title.</li> <li>○ Paragraph 97 - Please explain</li> </ul>	

Table 5.24 [Policy 13 - Land South of Dicketts Road] key issues

Key issues raised (Policy 13 - Land South of Dicketts Road)	Respondent(s)
<b>Policy 13 Site Assessment</b>	
<p><b>Disagree with the allocation site assessment:</b> The site assessment does not leave enough developable land and is poorly related to the town centre. Allocate instead Land North of Bath Road. Policy 7 is not justified or effective. No detailed information for groundwater flooding and sewer easements available and green buffers, leaving it unclear whether there is enough developable land. The site is poorly related to the town centre, schools and leisure centre with no indication of how improvements can be made and whether the site capacity and other mitigation measures will be able to fund the necessary improvements. Land North of Bath Road is unconstrained by landscape designation, has same batscape matters to mitigate and is within easy walking distance of the town centre, schools and leisure facilities.</p>	Great Tew Banthan Estates.
<b>Policy 13 Land South of Dicketts Road</b>	
<p><b>Support:</b> Supports the inclusion of this site as an allocation.</p>	Trustees of Wilford Family Trust; De Vernon Trustees.
<b>Sustainability Appraisal</b>	
<p>There are no designated heritage assets in close proximity. Amend the SA score to neutral.</p>	De Vernon Trustees.
<b>Ecological connectivity</b>	
<p><b>Ecological connectivity:</b> Recommend that the policy is strengthened to specifically require the retention of mature native trees including those within the small copse located in the centre of the allocation site.</p>	Natural England.
<b>Policy 13 Road</b>	
<p><b>Policy 13 First Bullet Point and Paragraph 4.64:</b> Would prefer to see a through road running east to west close to the southern edge of the site which would enable a future connection to Site 4, avoiding Dicketts Road and offer potential to provide road access from the B3355 to the railway station site.</p>	Corsham Town Council.
<p><b>Sustainable transport modes are laudable, but the site is heavily constrained by access:</b> The B3533 has major pinch points. The scale of development will overburden the existing highway network, which is already at the verge of its capacity. Amend the policy to require any proposal to offer a costed strategy to mitigate the highway impact of development to the south of the town.</p>	LD&PC Ltd.
<b>Figure 4.7 Concept Plan</b>	

Key issues raised (Policy 13 - Land South of Dicketts Road)	Respondent(s)
<b>Inconsistency with Paragraph 4.64:</b> Figure 4.7 approach differs from Paragraph 4.64. Amend by adding the word "broad" in front of the wording concept plan. Correct the GI typo.	De Vernon Trustees.
<b>Difficult to read:</b> Figure 4.7 Plan is very small and difficult to read. GI figure is incorrect.	Corsham Town Council.
<b>Retail Primary Frontage</b>	
<b>Figure E6:</b> Extend the primary frontage area to include the High Street as far as the Corsham Post Office.	Corsham Town Council.

Table 5.25 [Policy 14 Devizes Market Town] key issues

Key issues raised (Policy 14 - Devizes Market Town)	Respondent(s)
<b>Level of growth</b>	
<b>Housing requirement for Devizes should be increased:</b> The housing requirement for Devizes should be higher.	Society of Merchant Venturers; Go South West Coast Ltd; Robert Hitchens Ltd; Pearce Planning; Hills Homes; Wadworth Brewery; Backhouse Housing Ltd.
<b>Support the scale of growth:</b> The scale of growth planned, and the neighbourhood area requirement is supported.	Individuals x10
<b>Role of market towns:</b> The reference to modest levels of growth at Devizes is at odds with the role of market towns having potential for significant development as stated in Policy 1.	Society of Merchant Venturers.
<b>Rate of growth lower than the Wiltshire Core Strategy:</b> The rate of growth proposed for Devizes in Policy 14 is lower than in the Wiltshire Core Strategy. There is a reduction in growth and a moratorium on development later in the plan period which is unjustifiable and not compatible with national policy.	Go South West Coast Ltd.
<b>Plan period should be extended:</b> The plan period should be extended and the housing requirement increased to reflect this.	Go South West Coast Ltd; Robert Hitchens Ltd; Wadworth Brewery; Backhouse Housing Ltd; Hills Homes; Society of Merchant Venturers.
<b>Accounting for over delivery in Devizes:</b> Growth for Devizes is based on need for Devizes only. However over-delivery is already accounted for through the standard method therefore planning growth through existing permissions should not be considered specifically for Devizes but for the larger district wide area. Growth should not be considered for Devizes alone. The Representor makes detailed comments on housing land supply.	Society of Merchant Venturers.
<b>Growth and sustainable transport modes:</b> Further growth will maintain existing bus services and could be located to target improvements to frequencies of bus services. Sites should be identified for Devizes in the Local Plan. Sites could maximise use of non car modes of transport for personal travel. Options include further land at Coate Road, which is close to the canal, Stagecoach service 49 and employment services, and land at Marshall Road/Nursteed Road/Marshall Hill where there is level access to the town centre and good proximity to employment and services.	Go South West Coast Ltd.
<b>Long term strategy:</b> As Devizes is one of 5 market towns in the Chippenham HMA additional growth and sites should be accommodated in the plan period. This is to ensure a long term strategy can be provided for the town.	Robert Hitchens Ltd.

Key issues raised (Policy 14 - Devizes Market Town)	Respondent(s)
<b>Reliance on the neighbourhood plan and small sites:</b> There is too much reliance on the housing numbers for Devizes on small sites and allocations in the neighbourhood plan.	Go South West Coast Ltd; Robert Hitchens Ltd; Pearce Planning Ltd.
<b>Role of Devizes Neighbourhood Plan (NP):</b> The Devizes NP focuses on small brownfield sites some of which have not come forward. This illustrates the uncertainty for delivery. The production of a neighbourhood plan is also optional increasing this uncertainty.	Robert Hitchens Ltd.
<b>Town cramming:</b> There should be a range and choice of sites and 'town cramming' should be avoided as it would not create balanced communities.	Robert Hitchens Ltd.
<b>Small greenfield sites required:</b> Small greenfield sites on the edge of towns are needed to guarantee continued supply of housing. The neighbourhood plan requirement figure for Rowde should be reallocated to Devizes as it is a more sustainable location.	Pearce Planning Ltd.
<b>Environmental constraints at Devizes do not preclude development:</b> None of the environmental constraints identified at Devizes preclude the principle of residential development. Constraints in Devizes should not stop development coming forward but ensure sustainable development occurs in the right location so it has less landscape and transport impact.	Hills Homes; Society of Merchant Venturers.
<b>Devizes is not constrained:</b> Devizes is not a constrained settlement.	Pearce Planning Ltd.
<b>Landscape appraisal scoring:</b> No sites in the landscape appraisal have a major adverse impact on landscape. The Representor provides comments on the landscape appraisal scoring. There is capacity for growth east of Devizes without adversely impacting on the AONB. Therefore growth should not be constrained at the town. Growth east of Devizes can avoid some traffic and air quality issues and link into the proposals for a railway station at Lydeway.	Hills Homes.
<b>Support for Devizes as constrained and a heritage settlement:</b> Support for the identification of Devizes as a constrained settlement and a heritage settlement. Support for Policy 14 and 15.	Assize Court Trust.
<b>Place shaping priorities</b>	
<b>Heritage:</b> The legacy of historic buildings in Devizes should be included as a standalone place shaping priority.	Devizes Assize Court Trust.
<b>Provision of community facilities:</b> The place shaping priorities are an appropriate framework for new development. PSP4 should not just cover tourism led regeneration. It should also encourage development of community facilities like those at the Assize Court project and show support for the railway station. There is a need to recognise the changing nature of town centres including uses such as community, cultural and leisure based activities.	Devizes Assize Court Trust.



Key issues raised (Policy 14 - Devizes Market Town)	Respondent(s)
<p><b>Reduce emphasis on tourism led development:</b> The wording of criterion 4 should be amended to reduce the importance of tourism development as part of town centre regeneration. [Policy wording amendment proposed by the Representor].</p>	<p>Wadworth Brewery; Backhouse Housing Ltd.</p>
<p><b>Principal Employment Area</b></p>	
<p><b>Policy HQ Principal Employment Area:</b> The policy map replicates the existing Police HQ employment allocation from the Core Strategy. Support for this but a wider site is used for Police HQ functions and operates as a single planning unit and should therefore all be allocated as a Principal Employment Area.</p>	<p>Policy and Crime Commissioner for Wiltshire and Swindon.</p>
<p><b>Employment allocation on land between the A361 and Horton Road</b></p>	
<p><b>Review of employment allocation:</b> Policy 14 and Appendix D are unsound because the existing employment allocation on land between the A361 and Horton Road has not been properly reviewed. The current appeal on the site should be taken into account. If that appeal is refused consideration should be given to allocating flexible uses on the site such as mixed use or residential.</p>	<p>Berkeley Strategic Land.</p>
<p><b>Support for inclusion of former skid pan in employment allocation:</b> Support the inclusion of the former skid pan site within Policy 14 as part of the 8.4 hectare employment allocation between the A361 and Horton Road.</p>	<p>Policy and Crime Commissioner for Wiltshire and Swindon.</p>
<p><b>Reference to Devizes Wharf, Assize Court and Wadworth Brewery Site in Policy 14</b></p>	
<p><b>Devizes Wharf, Assize Court and Wadworth Brewery reference in Policy 14:</b> Policy 14 is not sound as it is not justified or consistent with national policy for the following reasons:</p> <ul style="list-style-type: none"> <li>• The extent of residential development within the wharf area currently states 100 dwellings. This should be increased to 150 dwellings.</li> <li>• Criterion 4 of Policy 14 encourages town centre and tourism led regeneration. The wording 'tourism-led' implies tourism uses shall be the primary development associated with the town centre regeneration. Whilst a cultural use associated with the historic brewery could form part of the optimum viable use of the buildings this has not yet been tested and is not informed by a proportionate or sound evidence base. There is too much emphasis on the brewery buildings to deliver tourism led regeneration. It might render the remainder of the floorspace unviable or would fail to allow a mix of town centre uses that would enhance the vitality and viability of Devizes town centre.</li> </ul>	<p>Wadworth Brewery; Backhouse Housing Ltd.</p>
<p><b>Policy map:</b> Identification of 'Land at Devizes Wharf, Assize Court and Wadworth Brewery' on the policy map is supported.</p>	<p>Wadworth Brewery.</p>

Key issues raised (Policy 14 - Devizes Market Town)	Respondent(s)
<p><b>Inclusion of Devizes Borough Police Station:</b> Support the inclusion of the Devizes Borough Police Station site within the proposed Central Wharf redevelopment area under Policies 14 and 15 for a mix of uses following the planned future relocation of the community policing team to a new facility which is to be built at Police HQ, London Road.</p>	<p>Policy and Crime Commissioner for Wiltshire and Swindon.</p>
<p><b>Biodiversity</b></p>	
<p><b>Protection of bat habitats:</b> Requirement to protect and enhance important bat habitats is supported.</p>	<p>Natural England.</p>
<p><b>Transport</b></p>	
<p><b>Devizes Park Way Station:</b> Land will need to be safeguarded for the Devizes Parkway Station. The safeguarded land will need to be included in the local plan policy documents should the station come forward. The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway.</p>	<p>Network Rail.</p>
<p><b>Land for Devizes Parkway station:</b> Support the development of a railway station in Devizes and request it is shown as a potential new railway station on Figure 3.2.</p>	<p>Devizes Assize Court Trust.</p>
<p><b>Impact on traffic demand on the A350 corridor and M4 J17:</b> Allocations are identified for Calne, Corsham, Devizes, and Melksham which could potentially impact traffic demand via the A350 corridor and M4 J17. This is within the context of comments on Policy 6 Chippenham and in relation to demand for logistics development around junctions within the M4 corridor, with existing development taking place at J17 and further land being promoted by developers.</p>	<p>National Highways.</p>
<p><b>Infrastructure</b></p>	
<p><b>Social and community infrastructure provision requirements:</b> Insufficient weight has been given to social and community infrastructure in Policies 14 and 15. Plans for development must include sporting and leisure facilities. [Policy wording amendment proposed by the Representor].</p>	<p>Trustees of Devizes Canoe Club.</p>
<p><b>Omission sites</b></p>	
<p>The following sites, that have already been assessed through the site selection process, were promoted as omission sites:</p>	
<ul style="list-style-type: none"> <li>Land adjoining Lay Wood (part of SHELAA site 662). The Representor promotes this site as a reserve site so the neighbourhood plan can deliver small sites within the urban area.</li> </ul>	<p>The Crown Estate.</p>

Key issues raised (Policy 14 - Devizes Market Town)	Respondent(s)
<ul style="list-style-type: none"> <li>Land East of Devizes (sites 3,4 and 6 in the site selection process). The site has been assessed in three separate parcels and should have been assessed as one site, which would change the Sustainability Appraisal score.</li> </ul>	Hills Housing.
<ul style="list-style-type: none"> <li>Land North East of Roundway Park (site 8 in the site selection paper). [Policy wording amendment proposed by the Representor].</li> </ul>	Society of Merchant Venturers.
<ul style="list-style-type: none"> <li>Land north east of Devizes at Coate Road.</li> </ul>	Robert Hitchens Ltd.
<ul style="list-style-type: none"> <li>Land west of Devizes (SHELAA site 3115).</li> </ul>	Pearce Planning Ltd.
<b>Site selection process</b>	
<b>Site selection stage 2:</b> There is no justification behind the accessibility and wider impact judgements.	Go South West Coast Ltd.
<b>Factoring in mitigation:</b> The site selection Sustainability Appraisal does not take account of mitigation or enhancements occurring as part of the planning permission granted for the appeal site.	Go South West Coast Ltd.
<b>Sustainability Appraisal (SA)</b>	
<b>Alternative Development Strategies:</b> The Representors provides comments on the SA of Alternative Development Strategies.	Hills Homes, Society of Merchant Venturers.

Table 5.26 [Policy 15 - Land at Devizes Wharf, Assize Court and Wadworth Brewery, Devizes] key issues

Key issues raised (Policy 15 - Land at Devizes Wharf, Assize Court and Wadworth Brewery, Devizes)	Respondent(s)
<b>Support for the site</b>	
<b>Historic environment:</b> Support for the place shaping where the historic character, appearance and heritage values of the area can inform the design and form of development. There is an opportunity to show how the historic environment has informed the allocation and concept diagram.	Historic England.
<b>Policy requirements:</b> Support for Policy 15 including the requirements for land use and masterplanning, heritage and transport, and protection of the canal and its use.	Devizes Assize Court Trust.
<b>Linkages:</b> Support for Policy 15, in particular the emphasis on linkages - including the canal side footpath and links between the brewery buildings and canal.	Wiltshire Museum.
<b>Police station site:</b> Support for the inclusion of the Devizes Borough Police Station site in the Central Wharf redevelopment in Policy 15 following the planned relocation of the community policing team who currently occupy the building.	The Police and Crime Commissioner.
<b>Masterplanning</b>	
<b>Over prescriptive to require the three wharf areas to be developed in combination:</b> It is overly prescriptive to require the three wharf areas to be developed in combination. It is unreasonable to delay delivery because other sites are not yet able to be brought forward. The delivery of the Wadworth site could act as a catalyst for the wharf. References in the policy link different land ownership parcels, for example the entire Lower Wharf area securing future use of Assize Court - this is not a realistic approach to delivery.	Wadworth Brewery; Backhouse Housing Ltd.
<b>Masterplanning study should not be relied on:</b> The masterplanning study should not be relied on. It is in draft format. This is the first time the public have had an opportunity to comment on it. It is incomplete evidence and should not inform Policy 15. The land uses prescribed within the study do not reflect the only sustainable approach to the redevelopment of the area. The study represents a strategy for the Wharf area from one point in time and it does not reflect the up to date context of the area, neither commercially nor in terms of land ownership. Reference to the masterplanning study should be removed until the document has been finalised following public and stakeholder consultation. If the Local Plan is adopted prior to this occurring reference to the study should be removed.	Wadworth Brewery; Backhouse Housing Ltd.
<b>A single comprehensive masterplan should be required:</b> A single comprehensive masterplan, phasing and delivery strategy should be required to be prepared and approved by the local planning authority in advance of any planning applications for the allocation. Other areas in the Local Plan require a single comprehensive masterplan, phasing and delivery strategy for development to be prepared and approved by the local planning	Devizes Canoe Club.

Key issues raised (Policy 15 - Land at Devizes Wharf, Assize Court and Wadworth Brewery, Devizes)	Respondent(s)
authority in advance of a planning application but is not the case for this site. The masterplanning study only includes the Lower Wharf and brewery site in detail. There is a risk that development will lack cohesion and not deliver on community needs.	
<b>Devizes Canoe Club</b>	
<b>Safeguard a site for Devizes Canoe Club (DCC):</b> A site for DCC should be integrated in long-term plans for development of the Wharf Area in Devizes. DCC should be integrated in the land use and masterplanning requirements for the site including provision of a new site for DCC whether that is a shared community sports facility or standalone club. This should feature in the Planning for Devizes document and/or the Devizes Area Neighbourhood Plan Review.	Devizes Canoe Club.
<b>Policy 15 statement on Devizes Canoe Club:</b> Policy 15 should include a statement that the canoe club is an important community asset and the facility it provides must be protected in the development. Policy 15 makes recommendations for several buildings and community assets but does not include DCC.	Devizes Canoe Club.
<b>Kennet and Avon Canal</b>	
<b>Ecological function of the canal:</b> Support for the policy requirement to protect the ecological function of the Kennet and Avon Canal, including the avoidance of light spill.	Natural England.
<b>Remove hedgerows and trees criteria:</b> Specific reference is made to retention of all hedgerows and trees in the policy. It is unnecessary to state this as the matter is dealt with under Policy 90: Woodland, Hedgerows and Trees. The wording should therefore be removed. If the wording is retained the text should acknowledge not all of it will be worthy of retention or that some loss may be appropriate for the benefit of the overall proposals.	Wadworth Brewery; Backhouse Housing Ltd.
<b>Heritage</b>	
<b>Use of the historic brewery building:</b> Support for the requirement within Policy 15 to restore and reuse the historic brewery buildings for their optimum viable use but the second bullet is not flexible enough to do this. The Respondent recommends changes to Policy 15.	Wadworth Brewery; Backhouse Housing Ltd.
<b>Viable use of heritage assets:</b> Support for development to secure the conservation and viable use of heritage assets and provide mixed commercial, residential, recreation and cultural uses.	Devizes Canoe Club.
<b>Infrastructure</b>	
<b>Assize Court funding requirement:</b> The Assizes for Devizes Project should be identified as having a funding requirement within the Local Plan.	Wiltshire Museum.

Key issues raised (Policy 15 - Land at Devizes Wharf, Assize Court and Wadworth Brewery, Devizes)	Respondent(s)
<p><b>Social and community infrastructure:</b> Insufficient weight is given to social and community infrastructure in Policies 14 and 15. There is not adequate protection of important social and community infrastructure including Devizes Canoe Club.</p>	<p>Devizes Canoe Club.</p>
<p><b>Sport, leisure, and recreation facilities:</b> A statement should be included linking the importance of the development of Devizes Wharf to address shortfall in sport, leisure and recreation facilities in Devizes. The policy does not include the contribution this area could make to addressing an identified shortfall in the range of sport, leisure, and recreation facilities within Devizes.</p>	<p>Devizes Canoe Club.</p>
<p><b>Other</b></p>	
<p><b>Rowde:</b> Comments were made against this consultation point about the neighbourhood plan designation for Rowde including suggested changes to paragraphs 4.77-4.79 to reflect NHS capacity issues in Rowde - these are picked up under the Chippenham Area consultation point.</p>	<p>Individuals x10.</p>

Table 5.27 [Policy 16 - Malmesbury Market Town] key issues

Key issues raised (Policy 16 - Malmesbury Market Town)	Respondent(s)
<b>Level of growth</b>	
<p><b>Level of growth should be increased:</b> The requirement for Malmesbury should be increased. The strategy for Malmesbury does not tackle the identified issues such as affordability and commuting by failing to optimise sustainable development opportunities at the town. The reduction from 665 to 600 dwellings since the last Regulation 18 consultation is not justified.</p>	Gleeson Land.
<p><b>Capacity for growth at the town:</b> There is capacity for growth at Malmesbury. The level of growth proposed is too small. Criterion 1 in Policy 16 does not provide enough detail on how local housing needs will be met. It is unclear how prospects for economic growth will be provided with no housing requirement. Additional land should be allocated for employment and residential development and this will help deliver infrastructure and support tourist trade.</p>	Hill Residential Ltd.
<p><b>Growth will support employment, tourism, climate change and meet local housing need:</b> There should not be a barrier to further development at the town. Appropriate growth can support local housing needs, employment function, tourist function and wider objectives related to climate change and sustainability.</p>	Miller Homes.
<p><b>Residual requirement of 0 is not supported by the evidence base:</b> A residual housing requirement of 0 is not supported by the evidence base and is not an effective strategy for the town. The scale of growth should be higher in order to address issues of affordability and commuting.</p>	Persimmon Homes.
<p><b>Housing land supply:</b> Growth via permissions should not be considered for Malmesbury but instead for the North and West HMA.</p>	Miller Homes.
<p><b>Growth at Milbourne:</b> Development should occur at Milbourne to meet needs in Malmesbury. [Policy wording amendment proposed by the Representor].</p>	Miller Homes.
<p><b>Malmesbury is not a constrained settlement:</b> Support for the identification for Malmesbury as a market town in the settlement strategy but the town should not be identified as a 'constrained' settlement.</p>	White Lion Land LLP.
<b>Reserve Site</b>	
<p><b>Reserve site should be allocated:</b> The Promoter of the site states that the reserve site should be allocated now to meet the housing requirement as the requirement should be higher. Detailed comments are made on the Sustainability Appraisal of growth scenarios.</p>	Hollins Strategic Land.

Key issues raised (Policy 16 - Malmesbury Market Town)	Respondent(s)
<p><b>Reserve site should be withdrawn:</b> It undermines neighbourhood planning and should not be applied in areas that have achieved their housing numbers. If a reserve site remains the allocation of that site should be delegated to neighbourhood planning groups.</p>	Malmesbury Town Council.
<p><b>Avoid impact on Cotswold National Landscape (CNL/AONB):</b> Policy 16 should ensure the reserve site is only brought forward if it can be demonstrated that harm to the setting of the CNL is avoided.</p>	Natural England.
<p><b>Remove allocation due to impact on Cotswold National Landscape (CNL):</b> The reserve site would fail to conserve and enhance the natural beauty of the CNL, including its landscape and scenic beauty. For it to be justified, further evidence would be needed to demonstrate the potential benefits of the allocation outweigh the great weight that should be given to conserving and enhancing the landscape and scenic beauty of the CNL.</p>	Cotswold National Landscape.
<p>The following reasons were given for objection to the reserve site:</p> <ul style="list-style-type: none"> <li>• The B4040 towards Sherston passes through the town centre via narrow congested Bristol Street. Traffic from this site will increase in the town centre, contradicting Policy 16 paragraphs 2, 3 and 4.</li> <li>• The site is a portal from the AONB. Development will detract from the town's rural setting, contradicting Policy 16 paragraph 1.</li> <li>• Main road access which will force traffic through the town centre.</li> <li>• There are no safe crossings on the A429.</li> <li>• The fields provide a community resource for walking and green space.</li> </ul>	Malmesbury Town Council; Individuals x10.
<b>Omission Sites</b>	
<p>The following sites, that have not already assessed through the site selection process, were promoted as omission sites:</p>	
<ul style="list-style-type: none"> <li>• Land to the west of Milbourne.</li> </ul>	Miller Homes.
<ul style="list-style-type: none"> <li>• Land opposite the Knoll, Burton Hill (SHELAA site 3783).</li> </ul>	Stonewood Homes.
<ul style="list-style-type: none"> <li>• Land to the north of Whychurch Farm, west of the A429.</li> </ul>	Gleeson Land.
<p>The following sites, that have already been assessed through the site selection process, were promoted as omission sites:</p>	
<ul style="list-style-type: none"> <li>• Land at Lawn Farm.</li> </ul>	Hill Residential Ltd.



Key issues raised (Policy 16 - Malmesbury Market Town)	Respondent(s)
<ul style="list-style-type: none"> <li>Land off Park Road. This has two permissions on it but the remainder of the site is suitable and available for development.</li> </ul>	White Lion Land LLP.
<ul style="list-style-type: none"> <li>Amended site boundary submitted for SHELAA site 3705.</li> </ul>	Trevally Ltd Property Consultants.
<ul style="list-style-type: none"> <li>Backbridge Farm (SHELAA 798). The site adjoins the neighbourhood plan allocation.</li> </ul>	Persimmon Homes.
<b>Infrastructure</b>	
<b>Water:</b> Policy 16 should reference the flood risk reduction project in Malmesbury and include safeguarding appropriate areas of land for flood risk infrastructure.	Environment Agency.
<b>Cycle infrastructure:</b> There is no reference to cycle infrastructure.	Individuals x10.
<b>Medical facilities:</b> There is no reference to medical facilities.	Individuals x10.
<b>Infrastructure provision:</b> It is not clear how infrastructure will be provided and it should be arranged into themes to make it more deliverable.	Hill Residential Ltd.
<b>Retail and employment</b>	
The garden centre site has not attracted commercial development and grants are needed to increase Malmesbury's employment base. The reuse of the Knee's store site will impact the town centre.	Malmesbury Town Centre.
<b>Technical documents</b>	
<b>Site selection process:</b> Comments were made on the site selection process for Malmesbury including comments on alternative sites and the reserve site, the exclusion of sites and the assessment of accessibility and traffic in Table 7 more accurately reflecting the status quo.	Malmesbury Town Council; White Lion Land LLP; Persimmon Homes.
<b>Sustainability appraisal (SA):</b> Comments were made on the SA of alternative development scenarios in the context of increasing growth at Malmesbury and on land not being included within the site selection SA.	Miller Homes; Persimmon Homes.
<b>Settlement boundary:</b> Land that has planning permission should be included in the settlement boundary or referenced in the plan.	Gleeson Land; White Lion Land LLP; Persimmon Homes.
<b>Cross boundary issues</b>	

Key issues raised (Policy 16 - Malmesbury Market Town)	Respondent(s)
Cotswold District Council would like to be informed of any new evidence that impacts site allocations close to the Cotswold District Council boarder near Malmesbury, employment at former RAF Kemble Airport, Cotswold Water Park and the Cotswold National Landscape.	Cotswold District Council.

Table 5.28 [Policy 17 - Melksham Market Town] key issues

Key issues raised (Policy 17 - Melksham Market Town)	Respondent(s)
<b>Melksham Market Town</b>	
<b>Housing allocations:</b> The plan does not allocate enough houses to meet projected growth at Melksham. Further allocations and an increase in capacity at existing allocations should be considered.	SF Planning; Bloor Homes South West; Robert Hitchens Ltd; Gladman; Martin Grant Homes; Gleeson Land; Hannick Homes; Catesby Estates; Baker Estates Ltd; Bellway Homes; Melksham Link Ltd; Terra Strategic Land.
<b>Brownfield commercial sites:</b> There are a number of brownfield commercial sites not being utilised within Melksham.	Individuals x10.
<b>Policy 17</b>	
<b>Plan period:</b> The housing requirement for Melksham should be over a Plan period of at least 2020 - 2041 - this would provide for a more positive and focussed indication for longer term growth.	Bloor Homes South West; Robert Hitchens Ltd; Melksham Link Ltd.
<b>Broad Locations for Growth:</b> Broad locations of growth will not provide the supply later in the Plan period that is required. Identifying a broad location for growth on the Key diagram at this stage would provide greater certainty.	Bloor Homes South West; Robert Hitchens Ltd; Gladman; SF Planning; Catesby Estates; Melksham Link Ltd; Bellway Homes.
<b>Sustainable settlement:</b> Melksham is a highly sustainable settlement and capable of accommodating significant strategic growth.	Gladman; Baker Estates Ltd; Martin Grant Homes; Hannick Homes; Baker Estates Ltd.
<b>Canal route safeguarding:</b> It is entirely inappropriate to continue to safeguard a future route for the Wilts and Berks Canal. The scheme is undeliverable and has been safeguarded for many years, without being delivered.	Martin Grant Homes.
<b>A350 Bypass:</b> The LPR refers to the provision of a bypass to the east of the town but there are no policies relevant to it and no suggestion that growth is contingent on its provision. Reference to the bypass should be deleted.	Gleeson Land.
<b>Employment land:</b> There is no evidential basis for requiring the allocation of additional employment land at Melksham due to a surfeit of existing land within the A350 FEMA.	Gleeson Land.
<b>Overreliance on sites to the east of the town:</b> There is an overreliance on sites to the east of the town which will have significant implications for wider infrastructure delivery in Melksham, including the Wilts and Berks canal.	Bellway Homes.
<b>Transport related issues</b>	

Key issues raised (Policy 17 - Melksham Market Town)	Respondent(s)
<b>Lack of necessary highway infrastructure:</b> Melksham is a location which already has growth restrictions due to a lack of necessary highway infrastructure. Concentrating growth to a few areas is not likely to have a positive impact on connectivity.	Kler Group Limited.
<b>A350 Bypass:</b> Transport modelling has been undertaken with a reliance on the delivery of a bypass to unlock housing in Melksham, yet there are still significant risks which could prevent the implementation of this important project.	Kler Group Limited.
<b>Traffic impacts:</b> It is noted that additional allocations are identified for Calne, Corsham, Devizes and Melksham which could potentially impact traffic demand via the A350 corridor and M4 J17.	National Highways.
<b>Melksham site allocations</b>	
<b>Site selection process:</b> The use of the arbitrary Place Shaping Priorities is not sound and is heavily skewed to favour larger sites rather than being based on the Sustainability Appraisal Process. The result has therefore made the draft allocations in Policy 17 unsound.	Waddeton Park Ltd.
<b>Employment land</b>	
<b>Employment demand:</b> The Employment Land Review shows a significant demand for employment land in the Melksham area. Despite this, the plan only allocates 5ha of land for employment within Melksham. This is completely insufficient for the needs of existing businesses within Melksham.	Gompels Ltd.
<b>Healthcare infrastructure</b>	
<b>Healthcare provision:</b> The effectiveness of the Area Strategies in addressing healthcare infrastructure needs would be improved by a more consistent approach to identifying the broad locations and type of healthcare infrastructure required to support the level of proposed growth.	NHS.
<b>Melksham canal link</b>	
<b>Melksham Link:</b> Policy should identify a delivery mechanism for the Melksham Link beyond just protection of the route.	Wiltshire Swindon & Oxfordshire Canal Partnership.
<b>Neighbourhood Area housing requirement</b>	
<b>Housing requirement:</b> The neighbourhood area housing requirement of 270 dwellings does not reflect the level of housing that is proposed to take place through completions and commitments.	Melksham Town Council; Melksham Without Parish Council.
<b>Melksham A350 Bypass</b>	

Key issues raised (Policy 17 - Melksham Market Town)	Respondent(s)
<b>Bypass delivery:</b> There is little information about when an A350 Melksham bypass would be delivered and some doubt over whether it will be delivered at all.	Kler Group Limited; Bellway Homes; Gladman.
<b>Lacock:</b> Traffic volumes through Lacock are having an adverse effect on the village environment and safety of residents. The Parish Council is of the opinion that no further dwellings should be built in the east of Melksham until a new bypass has been built.	Lacock Parish Council.
<b>Bypass not needed:</b> The A350 Bypass proposal should be scrapped. This proposal is badly planned, it is not needed and will not create the benefits that Wiltshire Council claim.	Individuals x10
<b>Omission site - Land at Upside, Melksham</b>	
<b>Land at Upside:</b> Upside, Melksham should be added as a mixed use allocation in the Local Plan for approximately 110 dwellings, up to 700sqm of Employment and public open space.	The Stantonbury Building and Development Company.
<b>Omission site - Land off A350 Melksham</b>	
<b>Land off A350:</b> Development of this site is consistent with a logical, sustainable next phase of growth for Melksham.	SF Planning.
<b>Omission site - SHELAA site 3743</b>	
<b>SHELAA site 3743:</b> This site should be included as part of the land to the north of the A3102 allocation at Policy 20 of the LPR.	Bloor Homes South West.
<b>Omission site - land off the A365, Shurnhold, Melksham</b>	
<b>Land off A365, Shurnhold:</b> In light of the revised technical work set out, and given the pressing need to allocate more land for housing at Melksham, this site should be considered for allocation.	Bloor Homes South West.
<b>Omission sites - SHELAA sites 1027 and 715</b>	
<b>SHELAA sites 1027 and 715:</b> These sites should be allocated to meet the longer term growth in the plan period - they would form a logical extension to Policy 20 and therefore to the settlement of Melksham.	Robert Hitchens Ltd.
<b>Omission site - Land west of Semington Road</b>	
<b>Land west of Semington Road:</b> The site is sustainable and suitable for residential development. Request that the site is allocated in the Wiltshire Local Plan for residential development.	Terra Strategic Land.
<b>Omission site - Site 14</b>	

Key issues raised (Policy 17 - Melksham Market Town)	Respondent(s)
<b>Site 14:</b> Generally agree with the methodology for the site assessment process, but do not consider the Stage 3 process has been reasonable or objective. Concerned that the site selection process has been predetermined and the Planning for Melksham paper written to retrofit and provide justification for the sites selected.	Charterhouse Strategic Land.
<b>Omission site - Land South of Bowerhill</b>	
<b>Land south of Bowerhill:</b> this site is a preferable location for strategic growth and the most suitable and sustainable site at Melksham that does not currently benefit from either a draft allocation or a 'live' planning permission.	Gladman.
<b>Omission site - Land off Berryfield Lane</b>	
<b>Land off Berryfield Lane:</b> this site is well contained and well related to Melksham, is not constrained by environmental designations and offers a suitable location for residential development.	Martin Grant Homes.
<b>Omission site - Land to the North of Melksham (Site 15)</b>	
<b>Land to the North of Melksham (Site 15):</b> The site is considered suitable for housing development and is consistent with a logical, sustainable next phase of growth for Melksham.	SF Planning.
<b>Omission site - SHELAA 3107 (part of Site 16) Land off Woodrow Road</b>	
<b>SHELAA 3107:</b> Site 3107 should be allocated for a small residential development that can be brought forward in the short term to deliver much needed market and affordable housing with associated benefits in a highly accessible and sustainable location.	Waddeton Park Ltd.
<b>Omission site - Land south of Western Way, Melksham</b>	
<b>Land south of Western Way, Melksham:</b> Given the proven suitability and sustainability of the site for development, it should be allocated in the Local Plan. The site was considered to be one of the two most sustainable locations for development in the Local Plan site selection process.	Hallam Land Management.
<b>Omission site - Land west of Semington Road</b>	
<b>Land west of Semington Road:</b> This is a highly sustainable site for residential development and well placed to accommodate the further growth required in the settlement.	Bellway Homes.
<b>Omission site - Broad Location for Growth - Southern Arc</b>	

Key issues raised (Policy 17 - Melksham Market Town)	Respondent(s)
<p><b>Southern Arc:</b> The Local Plan should identify a broad location for growth to accommodate development towards the end of the Local Plan period and beyond located to the southwest of Melksham on land between the River Avon in the West to the Bowerhill area in the east.</p>	Melksham Link Ltd.
<p><b>Omission site - Land at Boundary Farm, Melksham (Site 11)</b></p>	
<p><b>Land at Boundary Farm:</b> This site is very well located to access the town centre, various existing employment sites, the rail station and other local amenities – it is also the only site at the edge of Melksham which can facilitate delivery of the canal infrastructure which is safeguarded by the plan.</p>	Baker Estates Ltd.
<p><b>Omission site - Land at Snarlton Farm, Melksham</b></p>	
<p><b>Land at Snarlton Farm:</b> Land at Snarlton Farm is a sustainably located housing site to the East of Melksham and a logical extension to Melksham.</p>	Catesby Estates.
<p><b>Land at Snarlton Farm:</b> A small area has been missed out from the Land East of Melksham allocation. Without it, any proposed development would be incomplete and it could put obstacles in the way of future development including infrastructure provision in the form of services, landscaping and drainage.</p>	Woolley & Wallis.

Table 5.29 [Policy 18 - Land East of Melksham] key issues

Key issues raised (Policy 18 - Land East of Melksham)	Respondent(s)
<b>Land East of Melksham - Policy 18</b>	
<b>SHELAA site 3701:</b> This is a key element of the proposed allocation under Policy 18 as it provides a direct link between the existing roundabout on Eastern Way and the balance of the allocation which is under the control of volume home builders. The site has potential to form a gateway to the wider allocation and given its relatively small size could be suitable for delivery by a SME home builder.	PlanningSphere.
<b>SHELAA site 3701:</b> Our evidence makes the case that the principal point of vehicular access to serve the allocation proposed under Policy 18 should be from the existing roundabout at Eastern Way via the subject site.	PlanningSphere.
<b>Policy 18 support:</b> In order to meet the test of soundness, we consider that the Council is justified in proposing the Land East of Melksham allocation under Policy 18.	PlanningSphere.
<b>Policy 18 support:</b> Support the allocation of the site but propose revisions to the allocation proposals to maximise housing delivery in general accordance with the emerging policy framework. The proposed quantum of development should be revised upwards to a figure of approximately 660 dwellings.	Gleeson Land.
<b>Policy 18 support:</b> Support the proposed allocation for 425 dwellings, 5ha of employment and associated uses. BLK LAB Developments Ltd have an interest in land in the north west corner of the allocation and have held discussions with other interested parties within the allocation regarding how the proposed allocation site can be brought forward for development.	BLK LAB Developments Ltd.
<b>Green infrastructure:</b> Support the inclusion of 18.7 hectares of green infrastructure within the concept plan but recommends this is set out in the policy as a minimum area requirement for the scheme. Also support the policy requirement to implement ecological buffer zones alongside the habitat to be retained but recommends that a minimum buffer width is specified.	Natural England.
<b>Provision of green space and buffer areas:</b> Given the imperative to maximise the use of land identified for development in pursuit of efficiency in the use of land, we consider that the supporting text to the policy places undue emphasis on the provision of green space and buffer areas that are purportedly required as component parts of the allocation. The terminology used within the policy suggests that the land is particularly sensitive (which it is not).	Gleeson Land.
<b>Employment land:</b> There is no evidence that justifies the requirement for 5.0 ha of employment land within this allocation and the site is not in the right location to address demands from the industrial market, and notional demand for office space at Melksham could be met on less than 25% of this area.	Gleeson Land.



Key issues raised (Policy 18 - Land East of Melksham)	Respondent(s)
<b>Masterplan / phasing and delivery strategy:</b> The requirement to produce and have approved by the Council, a comprehensive masterplan / phasing and delivery strategy for the site, is unnecessary for a site of this scale/ nature and would unnecessarily delay the delivery of housing.	Gleeson Land.
<b>Concept Plan:</b> Consider that there is no need for the inclusion of a Concept Plan for the site. The written policy provisions are sufficient to guide the development of the site in a way that would deliver the fundamental requirements, and the remainder can be left to planning applications.	Gleeson Land.
<b>Self-build housing:</b> As Policy 18 includes no requirement for, or justification of, self-build housing provision within this allocation, reference to it on any retained Concept Plan should be deleted.	Gleeson Land.
<b>Self-build housing:</b> It is noted that part of the area within BLK LAB Developments control is shown as an area that could suit self build housing. However, the location shown is not necessarily the most appropriate for self build housing. This should be determined through more detailed planning application work.	BLK LAB Developments Ltd.
<b>Traffic through Lacock:</b> The Trust has previously noted how motorists travelling from the east side of Melksham often use New Road, Lower Woodrow and Forest Lane to access the A350 via Lacock village. This route is inappropriate for large volumes of traffic and new housing development will exacerbate this. The proposed housing allocations on the east side of Melksham are not sound in the absence of any means to avoid the new housing adding to the traffic using rural lanes and Lacock village to access the A350.	National Trust; Melksham Without Parish Council.
<b>Education provision:</b> Education provision has not been properly considered. We see no evidence that capacity has been considered for children outside the immediate Melksham Town area.	Community Action Whitley and Shaw.
<b>Employment on greenfield land:</b> Object to the use of greenfield land for employment when there are suitable brownfield sites available (such as Cooper Tires) or potentially available (such as land adjoining Bowerhill Industrial Estate).	Community Action Whitley and Shaw.
<b>A350 Bypass:</b> The proposed East of Melksham development is very close to the proposed route of the A350 Melksham Bypass and its junction with the A3102. Any development in this area should be postponed until the bypass route has been confirmed, so that designs to alleviate the noise, air and visual impacts can be taken into account in the development plan.	Individuals x10.
<b>A350 Bypass:</b> Concerns regarding the bypass delivery and how this has framed the growth locations to the east of the town.	Bellway Homes.
<b>Over-reliance on growth to the east of Melksham:</b> Consider the proposed Melksham allocations to be unsound with a clear over-reliance on growth to the east of the settlement with more sustainable growth locations to the west of the town capable of providing wider benefits.	Bellway Homes.

Table 5.30 [Policy 19 - Land of Bath Road, Melksham] key issues

Key issues raised (Policy 19 - Land off Bath Road, Melksham)	Respondent(s)
<b>Policy 19 - Land off Bath Road</b>	
<b>Policy 19 support:</b> This site provides certainty of housing delivery, including of affordable homes, in close proximity to Melksham Town Centre. The site is well located relative to the existing urban area and has good access to local facilities, including local retail, education and sports provision.	Hannick Homes.
<b>Expansion of Melksham Oak Community School:</b> The allocation supports the expansion of Melksham Oak Community School, essential infrastructure to support the growth and sustainability of Melksham. There is a clear need for expansion and the alternatives are restricted by locational considerations.	Hannick Homes.
<b>Green infrastructure:</b> Support the inclusion of 2.1 hectares of Green Blue Infrastructure Corridor and 2 ha of Other Green Infrastructure as set out in the concept plan but recommends this is set out in the policy as a minimum area requirement for the scheme. Supports the policy requirement to implement ecological buffer zones alongside the habitat to be retained but recommends that a minimum buffer width is specified.	Natural England.
<b>Potential noise impacts:</b> There may be impacts of noise from A365/potential A350 bypass and Oakfields Stadium.	Melksham Without Parish Council.
<b>Accessibility:</b> This site is further away from the train station, shops and employment sites than other potential housing sites which were assessed in the Sustainability Appraisal thus the exclusion of some of those sites is not fully justified.	SF Planning.
<b>Accessibility:</b> Allocations to the east of the town at the expense of the north and west do not make sense given that the Council wants to encourage greater use of the train station (policy 17) and promote more sustainable travel in general.	SF Planning.
<b>Education provision:</b> Education provision has not been properly considered; we see no evidence that capacity has been considered for children outside the immediate Melksham Town area.	Community Action Whitley and Shaw.

Table 5.31 [Policy 20 - Land North of the A3102, Melksham] key issues

Key issues raised (Policy 20 - Land North of the A3102, Melksham)	Respondent(s)
<b>Policy 20 - Land North of the A3102</b>	
<b>Policy 20 support:</b> Assessment work undertaken by the developer concludes that: “... <i>the site is sustainable and is suitable for future residential development</i> ”.	Bloor Homes.
<b>SHELAA site 3743:</b> This site should be included as part of the site allocation - the majority of the parcel is proposed for green infrastructure, including public open space.	Bloor Homes.
<b>Housing capacity:</b> With the inclusion of SHELAA site 3743, detailed technical work suggests that there is capacity on this allocation to accommodate 385 dwellings.	Bloor Homes.
<b>Masterplan approval:</b> Policy 20 requires a single comprehensive masterplan, phasing, and delivery strategy for the development to be prepared and approved by the local planning authority in advance of any planning applications being submitted for the whole, or part of the site. No information is provided in the policy as to how Bloor Homes, as a prospective applicant, would agree these requirements with the LPA in advance of a planning application.	Bloor Homes.
<b>Concept Plan:</b> The Policy should be amended to reflect the status of the concept plan provided at Figure 4.14 that it is only one possible way in which the site could be developed.	Bloor Homes.
<b>Green infrastructure:</b> Support the inclusion of 5.1 hectares of green infrastructure within the concept plan but recommends this requirement is set out in the policy as a minimum area requirement for the scheme. Support the policy requirement to implement buffers either side of the watercourse but recommends that a minimum buffer width is specified.	Natural England.
<b>A350 bypass:</b> Concerns regarding the bypass delivery and how this has framed the growth locations to the east of the town. There is a clear over-reliance on growth to the east of Melksham with more sustainable growth locations to the west of the town capable of providing wider benefits.	Bellway Homes.
<b>Education provision:</b> This has not been properly considered; we see no evidence that capacity has been considered for children outside the immediate Melksham Town area.	Community Action Whitley and Shaw.
<b>Accessibility:</b> This allocation is further away from the train station, shops and employment sites than other potential housing sites which were assessed in the Sustainability Appraisal; thus the exclusion of some of those sites is not fully justified.	SF Planning.

Key issues raised (Policy 20 - Land North of the A3102, Melksham)	Respondent(s)
<p><b>Sustainable travel:</b> Allocations to the east of the town at the expense of the north and west do not make sense given that the Council wants to encourage greater use of the train station (policy 17) and promote more sustainable travel in general.</p>	<p>SF Planning.</p>
<p><b>Traffic through Lacock:</b> The Trust has previously noted how motorists travelling from the east side of Melksham often use New Road, Lower Woodrow and Forest Lane to access the A350 via Lacock village. This route is inappropriate for large volumes of traffic and new housing development will exacerbate this. The proposed housing allocations on the east side of Melksham are not sound in the absence of any means to avoid the new housing adding to the traffic using rural lanes and Lacock village to access the A350.</p>	<p>National Trust; Melksham Without Parish Council.</p>

## Local Plan section 4: Strategy for the Salisbury HMA

**5.25** Please see below the key issues tables listing the key issues raised for the parts of the plan within section 4: Strategy for the Salisbury HMA, namely:

- Strategy for the Salisbury Housing Market Area
- Policy 21: Salisbury new community
- Policy 22: Salisbury Principal Settlement
- Policy 23: Land NE of Old Sarum
- Policy 24: Land at Netherhampton Road Garden Centre
- Policy 25: Land North of the Beehive P&R
- Policy 26: Land North of Downton Road
- Policy 27: Land South of Harnham
- Policy 28: Land West of Coombe Road
- Policy 29: SANG, South Salisbury
- Policy 30: Land East of Church Road, Laverstock
- Policy 31: Salisbury Central Area
- Policy 32: Salisbury Skyline
- Policy 33: The Maltings and Central Car Park
- Policy 34: Churchfields Employment Area
- Policy 35: Salisbury District Hospital campus
- Policy 36: Amesbury Market Town
- Policy 37: Boscombe
- Policy 38: Porton Down
- Policy 39: Tidworth and Ludgershall Market Town
- Policy 40: Land South East of Empress Way
- Policy 41: Land at Bulbridge Estate, Wilton
- Policy 42: Land at Dead Maid Quarry Employment Area, Mere
- Policy 43: Land safeguarded for education at Tanner's Lane, Shrewton

Table 5.32 [Strategy for Salisbury Housing Market Area] key issues

Key issues raised (Strategy for Salisbury Housing Market Area)	Respondent(s)
<b>Salisbury HMA</b>	
<b>River Avon SAC:</b> Natural England supports the identification of the River Avon SAC as a substantive environmental constraint for development in Salisbury.	Natural England.
<b>Salisbury</b>	
<b>Meeting housing needs:</b> The strategy fails to properly address meeting identified local housing needs of the Salisbury HMA. Supply for the HMA will not meet identified needs.	Go South Coast Ltd; Barratt David Wilson Homes.
<b>Reliance on unidentified sites:</b> The strategy for the Salisbury HMA relies too heavily on unidentified sites (including neighbourhood plan requirements), with optimistic assumptions that as yet unidentified sites can deliver by 2038.	Go South Coast Ltd.
<b>Less growth at Salisbury:</b> The strategy should direct less growth towards Salisbury because the medieval cathedral city and its green setting and river system are nationally important.	Individuals x10.
<b>Infrastructure:</b> Concern that Salisbury's infrastructure is already/will become too stretched.	Individuals x10.
<b>Employment:</b> Concern that availability of employment in Salisbury has contracted in recent years – the strategy should be focusing housing growth to areas with more economic growth – matching new housing to employment availability.	Individuals x10.
<b>Brownfield sites:</b> The strategy for Salisbury should utilise brownfield sites that have been identified by Salisbury City Council through the emerging neighbourhood plan; e.g. the Maltings and central car park, the Old Engine Shed, the gasworks site at Coldharbour Lane, Quidhampton Quarry.	Individuals x10.
<b>Churchfields:</b> The Local Plan proposals for Churchfields Industrial Estate are in conflict with proposals set out in the emerging Salisbury Neighbourhood Plan.	Individuals x10.
<b>Harnham gyratory:</b> The strategy for Salisbury which focuses much of the city's growth to Harnham/south Salisbury will overly increase vehicle trips/overburden the Harnham gyratory.	Individuals x10.
<b>Laverstock:</b> The strategy for Salisbury should not include an allocation at the Small Village of Laverstock.	Individuals x10.
<b>Old Sarum Airfield:</b> Support the proposed deletion of the WCS policy for the development at Old Sarum Airfield.	Individuals x10.

Key issues raised (Strategy for Salisbury Housing Market Area)	Respondent(s)
<b>Development at smaller settlements:</b> Allocating development at smaller settlements that are close and well connected to Salisbury would assist in the provision of much needed new housing for Salisbury in sustainable locations – i.e Ford.	Barratt David Wilson Homes.
<b>Development in rural areas:</b> In relation the SA Objectives which consider the alternative development strategies of further growth at Salisbury as opposed to growth in the rural areas - the SA states that development in rural areas may increase reliance on vehicles whereas growth at Salisbury could be supported by sustainable transport options. However, proposed allocations around Salisbury are far from the town centre so walking and cycling are unrealistic. By comparison, development in rural areas would support and enhance existing and future services to allow rural settlements to grow in a sustainable pattern.	Metis Homes.
<b>Amesbury</b>	
<b>Insufficient landscape and heritage evidence:</b> Insufficient landscape and heritage evidence has been presented to support the strategy of allocating no sites at Amesbury.	Waddeton Park; Go South Coast Ltd.
<b>Constrained settlement:</b> Concern raised that neighbourhood planning requirements may not be possible to achieve as Amesbury is a constrained settlement.	Go South Coast Ltd.
<b>Tidworth</b>	
<b>Constrained settlement:</b> Concern that neighbourhood planning requirements may not be possible to achieve as Tidworth is constrained by operational military land.	Go South Coast Ltd.
<b>Ludgershall</b>	
<b>Support for strategy:</b> Broad support for the strategy which allocates land at Ludgershall.	Ludgershall Homes.
<b>Scale of growth:</b> Concern that the scale of growth at Ludgershall - a relatively small market town - is disproportionate and distorts the spatial pattern of development in a manner that is unjustified by anything other, than that the settlement and the site is considered “unconstrained”.	Go South Coast Ltd; Redrow Homes.
<b>Constrained settlement:</b> Concern that neighbourhood planning requirements may not be possible to achieve as Ludgershall is constrained by operational military land.	Go South Coast Ltd.
<b>New settlement</b>	
<b>New settlement:</b> A new settlement of the scale proposed is not a realistic option to deliver homes in this Plan period, due to long lead in times; the Local Plan should be planning to meet needs for this plan period; it is not sound to rely on these numbers for this plan period.	Metis Homes; Redrow Homes; Barratt David Wilson Homes.

Key issues raised (Strategy for Salisbury Housing Market Area)	Respondent(s)
<b>Delivery within plan period:</b> The scale of outstanding requirements means that a new settlement should be delivered within the plan period – not deferred to the next plan.	Go South Coast Ltd.
<b>Consider all other options:</b> A new community should not be considered until all other options at existing settlements have been brought forward.	Longford Estates; Waddeton Park.
<b>Vague aspiration:</b> The new community idea has been proposed for many years without progression – it remains a vague aspiration which is not effective planning.	Individuals x10.
<b>More robust evidence required:</b> The reliance on the contribution of a new community needs to be supported by more robust evidence base than a broad area of search.	Redrow Homes; Waddeton Park.
<b>Rural</b>	
<b>Level of growth in rural areas:</b> Object to the level of growth directed, as unidentified sites, to the rural area – most have less than 1200 residents, minimal local facilities and employment, and few options aside from private cars – needing public transport services across a wider rural area.	Go South Coast Ltd.
<b>Too much focus on main settlements:</b> Concern that the Local Plan focuses too much on main settlements to the disadvantage of rural areas, leading to economic disbenefits, social deprivation, ageing/inactive populations in these areas. More investment in rural areas is needed through new development.	Metis Homes.



Table 5.33 [Policy 21 - New Community Area of Search] key issues

Key issues raised (Policy 21 - New Community Area of Search)	Respondent(s)
<b>Support</b>	
<p><b>Policy support:</b> Given the acknowledged constraints on development within Salisbury itself, a separate new settlement north of Salisbury is supported and needs to be progressed urgently. This would be closer to the A303 strategic transport route and relieve pressure on Salisbury's congested transport infrastructure. This is the only long term sustainable option. Longer term the city will not be able to accommodate the scale of growth it had in the past. A new community should mean that some of the more unsuitable/unsustainable proposed greenfield site allocations in the Plan at Salisbury i.e. at Britford and Harnham, can be removed.</p>	Individuals x40.
<p><b>Policy support:</b> The Civic Society has been arguing for a new settlement for at least 20 years, to relieve the pressure on greenfield sites on the edge of Salisbury. However, disappointed that even now, a new settlement is just something which may be thought about in the future. A new community is needed now, not through a 'future review'.</p>	Salisbury Civic Society; Individual x10.
<p><b>Policy support:</b> NFDC supports the broad approach set out in Policy 21. Whilst noting that this will be a matter principally dealt with in a future review of the Local Plan, there is some uncertainty as to whether the suggested scale of the new community would lead to a self-contained sustainable new settlement with an adequate range of local facilities and sustainable transport options which is able to meet the unmet needs as identified at the time. A modification to the accompanying text which expresses the 1,500-2,000 homes as a likely minimum quantum is suggested to help address this matter.</p>	New Forest District Council.
<b>National Highways</b>	
<p><b>Transport impacts:</b> Opportunities to expand the settlement of Salisbury are limited, as is the case for Amesbury. In light of these constraints, we note Policy 21 proposes an area of search for a possible new community north of Salisbury. National Highways notes the proposed approach and would require further discussion at an appropriate future time to understand the potential SRN impacts of any new community.</p>	National Highways.
<b>National Rail</b>	
<p><b>Future infrastructure needs:</b> Network Rail do not believe that the inclusion of this policy is either justified or effective. Whilst the potential need for a new community of up to c2000 dwellings may be required in a future review of the Plan, at present the area of search is extremely broad and no preferred option is presented. This makes it challenging for infrastructure providers, including Network Rail, to identify future infrastructure needs to support the potential new community. In the absence of this detail, Network Rail would question the requirement for a Policy on this to be included in the Local Plan Review.</p>	National Rail.

Key issues raised (Policy 21 - New Community Area of Search)	Respondent(s)
<b>New Community Area of Search - issues with Policy 21</b>	
<p><b>Strategic vision:</b> It is presumed that Wiltshire Council has failed to respond to the need to identify and deliver this site within the 15-year Plan timetable and relieve the pressure on an already constrained Salisbury, because the Plan does not include the full 1500-2000 housing delivery in its trajectory to 2038. The decision by Wiltshire Council to defer any housing allocation in the Plan period to 2038 and beyond for this new community raises questions about the strategic vision behind this choice. The perception that Wiltshire Council has deferred the implementation of this new community, potentially opting for an easier route with greenfield land, is seen as lacking in visionary planning, especially when considering the long-term housing needs and sustainable development.</p>	Individuals x40.
<p><b>Specific site should be identified:</b> The current draft Plan merely identifies a large and vague "area of search" for a possible new community in the future. There is no clarity on why more progress has not been made since this idea was initially floated at least as far back as 2017. Delivering major new settlements takes long lead times and significant upfront planning. Policy 21 should identify a specific site for the new community and that a realistic assessment of likely rates of delivery in the mid – late plan period should be included in the Plan. Postponing this proposal to some future local plan review is not acceptable. It is not possible to rely on any potential development from this source in the plan period. This issue requires more urgency.</p>	Individual x30; Benchmark Planning; Woodhouse Developments (Amesbury) Ltd; Bloor Homes Ltd (Southern Region); Redrow Homes; Bloor Homes (South West) Ltd; Persimmon Homes Wessex & Persimmon Homes South Coast; Barratt Homes (Bristol); David Wilson (South); Home Builders Federation; Hallam Land Management; Wyatt Homes; Property Alliance Group Ltd; Bellway Homes; Lincoln College Oxford; Network Rail; Swindon Borough Council; Harnham Housing Steering Group; Go South Coast Ltd; CPRE.
<p><b>Imprecise policy:</b> Large areas of the Salisbury HMA are identified within the 'Area of Search for a New Community'. The policy is imprecise in all important respects. A similar approach has historically been proposed by Hart District Council (Winchfield/Murrell Green new settlement) and in East Hampshire District Council (A31 area of search). In both instances one of the key criticisms at examination (Hart DC) and through consultation (East Hampshire DC) was the inability to provide surety around delivery owing to the multiple, and often complex, land ownership/control arrangements and the scale and deliverability of the associated large scale infrastructure. In the case of Winchfield/Murrell Green, the Inspector ultimately deleted the emerging Policy from the Local Plan following Examination.</p>	Metis Homes; St Philips Land Ltd; Barratt Homes (Bristol); David Wilson (South); Wyatt Homes; Hallam Land Management; L&Q Estates; Lincoln College Oxford; Network Rail; Go South Coast Ltd.
<p><b>Assessing other reasonable alternatives:</b> The Hart Inspector argued that the Plan established the 'principle' of the new settlement as the most appropriate growth strategy for meeting the Council's long-term needs within a relatively confined area of search. However, he highlighted that the Plan had not tested other reasonable</p>	St Philips Land Ltd; Benchmark Planning; Woodhouse Developments (Amesbury) Ltd; Bloor Homes Ltd (Southern Region); Bloor Homes (South West) Ltd; Persimmon Homes

Key issues raised (Policy 21 - New Community Area of Search)	Respondent(s)
<p>alternatives to a new settlement. This emphasises the critical need for the Council to robustly test reasonable alternatives for the spatial distribution of the District's housing needs through the Sustainability Appraisal [SA] process at an early stage.</p>	<p>Wessex &amp; Persimmon Homes South Coast; Barratt Homes (Bristol) and David Wilson (South); Hallam Land Management; Wyatt Homes; L&amp;Q Estates.</p>
<p><b>Uncertainty over housing delivery:</b> Policy 21 states that the need for a New Settlement would be considered through a review of the emerging Plan. There are potential issues with a large proportion of the proposed allocations around Salisbury, some of which relate to the complexity around delivery associated with large scale masterplanning requirements. On the basis of the Council's assumptions around Salisbury, there will likely be delays in the delivery of housing across the Plan area. This is likely to reveal a 'need' for the scale of new housing proposed by the 'New Settlement' within any Review. This points to the fact that there are large areas of uncertainty within the ability of the Plan to deliver housing.</p>	<p>Metis Homes; Home Builders Federation; Hallam Land Management; Swindon Borough Council.</p>
<p><b>Strategic policy unnecessary:</b> The Local Plan evidence concludes that the preferred delivery strategy would enable the Council to meet its own housing needs, without the need to allocate a new settlement within this plan period. Fundamentally, there is no evidence to suggest that such a policy approach is necessary within this plan period and why a strategic policy is necessary to set out the Council's ambitions for the next Local Plan Review.</p>	<p>St Philips Land Ltd; Woodhouse Developments (Amesbury) Ltd; Bloor Homes Ltd (Southern Region); Bloor Homes (South West) Ltd; Persimmon Homes Wessex &amp; Persimmon Homes South Coast; Wyatt Homes; L&amp;Q Estates.</p>
<p><b>Policy not based on relevant evidence:</b> The proposed approach to identify a new settlement in the Salisbury HMA is not soundly based on any relevant evidence and fails to positively plan for the long term future of the communities of the southern part of Wiltshire. It is fundamentally unclear whether the policy is a serious and feasible proposition. The lack of information suggests that it cannot be considered a sound policy. Policy 21 should be deleted and sufficient specific deliverable and developable sites should be identified in the Salisbury HMA to meet the elevated development requirements that are required for a plan period to at least 2040.</p>	<p>Woodhouse Developments (Amesbury) Ltd; and Bloor Homes Ltd (Southern Region); Redrow Homes; Bloor Homes (South West) Ltd; Persimmon Homes Wessex &amp; Persimmon Homes South Coast; Barratt Homes (Bristol) and David Wilson (South); Home Builders Federation; Hallam Land Management; Wyatt Homes; L&amp;Q Estates; Property Alliance Group Ltd; Bellway Homes; Lincoln College Oxford; Swindon Borough Council; Go South Coast Ltd.</p>
<p><b>National Landscape and Dark Sky Reserve:</b> The area of search shown for the potential new settlement should be significantly reduced to reflect the need to conserve the sensitivity of the National Landscape and International Dark Sky Reserve. The policy wording fails to acknowledge the conservation and enhancement of the National Landscape and Dark Sky.</p>	<p>Cranborne Chase Area of Outstanding Natural Beauty.</p>

Key issues raised (Policy 21 - New Community Area of Search)	Respondent(s)
<p><b>Land values:</b> The current approach of identifying a large area of search (incorporating the National Landscape/Dark Sky Reserve and Salisbury Plain) risks inflating land prices on the basis of hope value / blighting land values through potential proximity of, and connection to, a new settlement.</p>	<p>Cranborne Chase Area of Outstanding Natural Beauty.</p>
<p><b>Growth at Amesbury:</b> Amesbury has been identified as a Constrained Settlement, primarily with reference to Landscape and Heritage issues, although there is not clear evidence supporting that conclusion and a more positive approach is required that provides strategic policy for growth at Amesbury over the plan period.</p>	<p>Woodhouse Developments (Amesbury) Ltd; Bloor Homes Ltd (Southern Region); Go South Coast Ltd.</p>
<p><b>Housing shortfall in Salisbury HMA:</b> There is an identified shortfall of 1,626 homes in the Salisbury HMA against the plans target for new homes in this area, and a more significant shortfall once necessary changes to the plan period and total quantum of necessary development are factored in.</p>	<p>Woodhouse Developments (Amesbury) Ltd; Bloor Homes Ltd (Southern Region); Bloor Homes (South West) Ltd; Persimmon Homes Wessex &amp; Persimmon Homes South Coast; Go South Coast Ltd.</p>
<p><b>Lack of long-term planning:</b> No long-term plan for the Salisbury HMA is being provided by this plan, which it is said is justified by unknown issues around the protection and restoration of the River Avon, and the constraints associated with heritage and landscape issues which are found in this part of the County. Solutions in respect of the River Avon around nutrients require solutions over the long term.</p>	<p>Woodhouse Developments (Amesbury) Ltd; Bloor Homes Ltd (Southern Region); Bloor Homes (South West) Ltd; Persimmon Homes Wessex &amp; Persimmon Homes South Coast; Home Builders Federation.</p>
<p><b>Statement of intent:</b> Policy 21 does not represent a policy that has any application in the determination of planning applications or managing growth throughout the Plan period. It does little more than set out a statement of intent which is not supported by any evidence to conclude that the new community is a viable or deliverable option to address the future growth requirements of Salisbury. Policy 21 should either be presented in a way that deals specifically with planning for this new community or deleted.</p>	<p>Persimmon Homes Wessex &amp; Persimmon Homes South Coast; Bloor Homes (South West) Ltd; Hallam Land Management; L&amp;Q Estates; Property Alliance Group Ltd; Bellway Homes; Swindon Borough Council; Go South Coast Ltd.</p>
<p><b>Inconsistent approach between New Community and Broad Locations for Growth:</b> The draft Local Plan takes a differing approach between the Broad Locations for Growth and the Salisbury 'new settlement', where draft Policy 21 refers to an 'area of search' for a 'possible new community' as shown on the Key Diagram, with the need to be confirmed through a 'review of this Plan'. There is therefore a greater commitment to a geographic location for the new settlement than there is for the Broad Locations for Growth.</p>	<p>L&amp;Q Estates; Bellway Homes.</p>
<p><b>Inconsistent approach to Amesbury:</b> The New Community policy is particularly incoherent in relation to Amesbury. On the one hand, the Local Plan defines Amesbury as one of the most sustainable locations for growth under the Settlement Hierarchy, but it is then considered a 'Constrained Settlement' under paragraphs 3.41 and Table 2 and is thus afforded no site-specific allocations. However, it is also placed at the centre of an</p>	<p>Lincoln College Oxford.</p>

Key issues raised (Policy 21 - New Community Area of Search)	Respondent(s)
<p>area of search for a large number of homes, affected by broadly similar constraints. A more justified and positive approach would be to undertake a full assessment of the capacity for growth directly at Amesbury, where there are known deliverable sites including that promoted by Lincoln College.</p>	
<p><b>Rail accessibility:</b> In line with the ‘Decarbonising Transport’ statement that “<i>we must make public transport, cycling and walking the natural first choice for all who can take it</i>” it is suggested that any new Community should be based around a railway station – likely to be a new or re-opened station. Without such a statement this policy is unsound/not justified.</p>	Cycling Opportunities Group Salisbury.
<p><b>Cross-boundary working:</b> Given the ‘Area of Search’ goes up to the Hampshire border there needs to be cross-boundary working with the County Council and relevant Borough Councils in Hampshire on this policy. Without close co- operation with neighbouring authorities who would be impacted this policy is unsound/not positively prepared and fails to comply with the duty to cooperate.</p>	Cycling Opportunities Group Salisbury.
<p><b>Larger new community required:</b> To provide a far-reaching solution to the development issues facing south Wiltshire, a new community needs to be larger than that proposed to secure the necessary infrastructure.</p>	Salisbury City Council.
<p><b>New Community housing and employment numbers</b></p>	
<p><b>Lack of evidence for housing and employment requirements:</b> The supporting text (para. 4.124) gives further detail of the potential requirements for the settlement, including 1,500 – 2,000 homes, 5ha of employment land and associated infrastructure. There is no evidence as to how these numbers, which may fall beyond the Plan period, have been calculated. The upper and lower ranges of these figures could fundamentally affect all aspects of the proposal in terms of positive and negative impacts, infrastructure needs, viability, and deliverability. Hence the nature of this proposal, let alone the benefits, impacts and overall planning merits, cannot meaningfully be defined or judged.</p>	L&Q Estates; Bellway Homes; Lincoln College Oxford.
<p><b>Employment provision:</b> In relation to employment, by proposing 5 hectares of employment land on a wholly open-ended basis, it undermines certainty and confidence for future investors looking to bring forward development at Principal Settlements and other sustainable locations, under Policy 64.</p>	Property Alliance Group Ltd.

Table 5.34 [Policy 22 Salisbury Principal Settlement] key issues

Key issues raised (Policy 22 - Salisbury Principal Settlement)	Respondent(s)
<b>Salisbury Spatial Strategy</b>	
<b>Unsustainable strategy:</b> The emerging development strategy (particularly, Policy 22) is unsustainable and likely harmful to the historic landscape and existing environment in and around Salisbury. Proposed allocations should be reviewed to only include sites that can be delivered without conflicting with the NPPF or other policies in the Plan.	Metis Homes; Individuals x10.
<b>Laverstock:</b> The urban area of Salisbury should be assessed based upon its physical and functional relationship to the adjacent settlements. In this case, Laverstock should be part of the Principal Settlement of Salisbury when examining options for growth.	Hallam Land Management.
<b>Provision of allocated sites:</b> Object to the inadequate provision of allocated sites to meet the identified housing need associated with the Salisbury Housing Market Area. There is a need to either increase the capacity of proposed allocations where the opportunity exists or to allocate additional residential sites.	Persimmon Homes (South Coast) Ltd; Longford Estate; Hallam Land Management; Persimmon Homes (South Coast) Ltd; Vistry Group.
<b>Release of greenfield land for housing:</b> The release of greenfield land for housing, ahead of previously developed land and employment land release, is entirely contrary to the spatial vision and delivery strategy.	Quidhampton Developments Ltd; Individuals x10.
<b>Policy support:</b> For Salisbury, the plan is sound. It is essential new houses are built. The population is aging, while local businesses are in desperate need of affordable accommodation to attract talent, especially graduates.	Individuals x10.
<b>Housing numbers</b>	
<b>Forecast housing needs not met:</b> The Revised Spatial Strategy acknowledges that the forecast housing needs for Salisbury cannot be met in full at this time. It then goes on to state that: <i>“For this iteration of the Plan however, an overall housing requirement for the County should not be reduced since there is contingency to compensate elsewhere in Wiltshire”</i> . It cannot be the case that contingency in another HMA can meet the needs attributed to the Salisbury HMA. If that were the case, then it would mean that the four HMAs as defined are meaningless and not a true representation of the distinct HMAs.	Persimmon Homes (South Coast) Ltd; Hallam Land Management; Vistry Group.
<b>Broad Locations of Growth:</b> In the context of Broad Locations of Growth, these are located in the Chippenham and Trowbridge HMAs, therefore their contribution (if any) to housing delivery over the plan period, cannot be attributed to the housing needs identified for the Salisbury HMA. They will not address the needs which have been identified for the Salisbury HMA and specifically the main settlement of Salisbury.	Persimmon Homes (South Coast) Ltd.

Key issues raised (Policy 22 - Salisbury Principal Settlement)	Respondent(s)
<p><b>Maltings &amp; Central Car Park:</b> Wiltshire Council wants to build 200-300 houses in the Maltings &amp; Central Car Park. Why aren't these numbers included in the housing allocation for Salisbury? This could prevent development of greenfield sites. Redevelopment of brownfield sites in the central area would support regeneration, but the Local Plan fails to take this approach even though there are opportunities.</p>	Individual x60.
<p><b>UKLF:</b> Concern that Wilton's existing allocation of 450 dwellings with 3ha employment at the UKLF site is being undermined by developer pressure to bring forward dwellings instead of employment, which is under pressure from a lack of 5 year housing supply.</p>	Wilton Town Council; Individuals x10
<p><b>New Community:</b> If Wiltshire Council is planning to build a new community north of Salisbury for around 1,500 - 2,000 homes, why hasn't there been any housing allocation in the Local Plan? Without the clarity associated with a new community being deliverable during the plan period there can be no certainty that the housing needs of the HMA would be met by the Local Plan.</p>	Individual x80, Britford Parish Council; Hallam Land Management; Blue Fox Planning on behalf of Persimmon Homes (South Coast) Ltd; Vistry Group.
<p><b>Employment growth:</b> The Plan anticipates housing growth that exceeds the actual workforce requirements across Wiltshire. In Salisbury, the proposed housing numbers exceed the projected job opportunities by nearly 600 people. What rationale supports a 10% surplus in Salisbury? The Plan must reflect the actual housing needs based on real employment growth in Salisbury.</p>	Individuals x10.
<p><b>Housing need:</b> The housing need for the Salisbury HMA identified at Table 4.1 of the Local Plan Review is 11,015 dwellings to be constructed between 2020 and 2038. However, Table 4.6 identifies that, with completions and existing commitments, there is only a supply of some 9,410 dwellings, excluding the Area of Search for a new community. This is a shortfall of some 1,605 dwellings which does not demonstrate a positive preparation of the Local Plan. The Local Plan Review should be identifying sufficient land to meet housing need.</p>	Hallam Land Management, Blue Fox Planning on behalf of Persimmon Homes (South Coast) Ltd; Vistry Group.
<p><b>Consultation</b></p>	
<p><b>Consultation:</b> The Wiltshire Council Local Plan website and portal is inaccessible, complex, and intimidating for residents. It is not realistic to expect residents, many of whom do not have computers, to be able to access and understand the suite of documents in order to raise representations. In essence, Wiltshire Council has failed to develop a means to properly consult residents of Salisbury and Wiltshire.</p>	Individual x80.
<p><b>Windfall</b></p>	
<p><b>Windfall:</b> It is not understood why Wiltshire Council has ignored the Salisbury Neighbourhood Plan which states that between 2,250 and 2,850 'windfall' homes could be delivered over the 18-year Plan period. If these were taken into consideration then you wouldn't need to build on greenfield sites elsewhere in Salisbury.</p>	Individual x90; Britford Parish Council.
<p><b>Brownfield sites</b></p>	

Key issues raised (Policy 22 - Salisbury Principal Settlement)	Respondent(s)
<b>Brownfield availability:</b> Considering the number of brownfield sites available in Salisbury, why is the Council allocating greenfield sites for housing development at Salisbury? Regeneration of the city's central area and guiding redevelopment are increasingly important as a means to help meet development needs.	Individual x220; Harnham Housing Steering Group; Cycling Opportunities Group Salisbury; Britford Parish Council.
<b>Churchfields:</b> Churchfields is an excellent site for housing development. Why has Wiltshire Council ignored Salisbury City Council's plans for progressively developing Churchfields? Strongly support a move towards a mixed use approach to Churchfields with housing as a significant part of the mix.	Individual x210; Harnham Housing Steering Group; Cycling Opportunities Group Salisbury; Britford Parish Council; Salisbury Area Greenspace Partnership; Salisbury City Council.
<b>Churchfields:</b> The strategy for Churchfields contains no measures to relieve the pressure of HGVs on the historic city centre which is their only access route. It aspires to 'improve transport' without any detail of how this will happen, whilst supporting a policy which does nothing to lessen the demand for HGV access.	Salisbury City Council.
<b>Neighbourhood Planning</b>	
<b>Neighbourhood area requirement:</b> The Salisbury neighbourhood area designation requirement seems to have been reduced from 410 to 60 dwellings. No explanation of this is given. Sites such as the Central Car Park should surely be taken into account in such calculations before deciding that peripheral development on greenfield sites is necessary. 60 dwellings is not justified and renders calculation of the required site allocations for Salisbury unsound.	Individual x30.
<b>Outward expansion:</b> There is a clear contradiction in the remits of the Local Plan and that being developed by Salisbury City Council. This is in respect of the nature of the "limited amount" of development on the periphery (Wiltshire Council) and the difficulties and limitations of "further outward expansion".	Salisbury District Council; Harnham Housing Steering Group; Individuals x10.
<b>Reliance on neighbourhood plans:</b> Reliance on neighbourhood plans in meeting the objectively assessed need for housing in the area is unsound and the reference to such neighbourhood plans should be deleted.	Redrow Homes
<b>Sustainability Appraisal</b>	
<b>Consideration of reasonable alternatives:</b> The SA fails to give adequate consideration of reasonable alternatives and the methodology and conclusions drawn by the Council in support of the Regulation 19 Plan are illogical. The SA does not consider all available alternatives, particularly the contribution that could be made by brownfield land in Salisbury.	Harnham Housing Steering Group; Salisbury City Council.
<b>Salisbury District Hospital</b>	



Key issues raised (Policy 22 - Salisbury Principal Settlement)	Respondent(s)
<p><b>Lack of detailed plans:</b> There is no detail about plans to regenerate the Salisbury Hospital site and therefore no opportunity to comment on issues relating to it, although it is the city's largest employer. This is particularly relevant to issues surrounding the lack of transport planning, the new housing sites proposed in this Review, and the Harnham Gyratory.</p>	Salisbury City Council.
<p><b>Suitable and affordable accommodation:</b> The inability of hospital staff to access and afford suitable accommodation is having a detrimental impact on the ability of Salisbury NHS Foundation Trust to recruit and retain an adequate number of staff – something that is viewed as one of the Trust's main strategic priorities. The proposed delivery of key worker housing as part of the HEAT project represents a direct response to this challenge and is fully compliant with the objectives of Policy 22.</p>	Salisbury NHS Foundation Trust; Salutem Developments.
<p><b>Provision of purpose-built student accommodation:</b> Housing market pressures also apply to the future student population in Salisbury. It will be important to ensure that their accommodation needs are met, and that the demand for housing for students does not have an adverse impact on the ability of the local community to access suitable housing. This can be achieved through the provision of purpose-built student accommodation at SDH. Policy 22 should specifically refer to the provision of suitable housing for key workers and students (including on-site key worker accommodation) and this should be recognised in Policy 35. There is a very strong rationale for this in the Salisbury HEAT Project Vision and Masterplan 2023 Update.</p>	Salisbury NHS Foundation Trust; Salutem Developments.
<p><b>Transport</b></p>	
<p><b>Impacts on transport system:</b> The transport system in Salisbury cannot cope with the additional traffic from housing sites allocated in the Local Plan. Improvements to the Harnham Gyratory and New Bridge Road to accommodate the increased traffic from the 640-home development on Netherhampton Road have not been delivered. The lack of detailed plans for the improvements to the Harnham Gyratory, New Bridge Road and Exeter Street Roundabout confirm that Wiltshire Council does not have a plan to address the substantial impact of additional traffic associated with new site allocations.</p>	Individual x200; Cycling Opportunities Group Salisbury.
<p><b>HGV traffic:</b> Reduction in HGV traffic is considered essential because of its adverse effect on air quality, the historic fabric of the city and impacts on the pedestrian environment.</p>	Salisbury Area Greenspace Partnership.
<p><b>Salisbury bypass:</b> Salisbury needs a bypass. The inner relief road is a blight on the historic town centre, and its numerous bottlenecks and traffic problems are the primary cause of the poor air quality in the city centre. The A36 needs to be linked from south to north, without going straight through the city. Such a route would eliminate poor air quality issues, particularly from HGVs and open access to new development land, and solve a part of the Wylde Valley's problems which have also been calling for a relief road for decades.</p>	Individual x10.

Key issues raised (Policy 22 - Salisbury Principal Settlement)	Respondent(s)
<p><b>Salisbury Transport Strategy:</b> Reference to the Salisbury Transport Strategy in Policy 22 '<i>Development at Salisbury will ....deliver funding contributions towards a Salisbury Transport Strategy</i>' is wholly inadequate. Failure to implement components of the Salisbury Transport Strategy to date indicate that the policy is unsound/unjustified.</p>	Cycling Opportunities Group Salisbury.
<p><b>Salisbury Transport Strategy:</b> There is no Transport Strategy that is up to date or makes detailed provision to counter the impact of development on this scale.</p>	Salisbury City Council.
<p><b>Developer contributions:</b> Almost all the improvements to transport infrastructure identified within the Plan rely heavily on developer contributions for funding. This may have led Wiltshire to place undue reliance on greenfield development for financial reasons. Given the scale of improvement needed to the city's transport infrastructure, it is extremely unlikely that developer contributions will make sufficient difference.</p>	Salisbury City Council.
<p><b>Location of Local Plan site allocations:</b> The development sites proposed are disproportionately either in Laverstock &amp; Ford parish or in the south of the city, the furthest point from main roads such as the A303, key employment sites and Sarum Academy. This will force more traffic onto the ring road, via the Harnham Gyratory, which is incapable of sufficient improvement to cope with rush-hour pressures, in particular. This traffic will also impact emergency services accessing the hospital, which must all go through the Gyratory.</p>	Salisbury City Council.
<p><b>Policy support:</b> The approach set out in Policy 22 and the 'Planning for Salisbury' document is supported by National Highways, albeit requirements for specific mitigations relevant to safety and performance of the SRN will continue to be reviewed by National Highways as part of future planning applications.</p>	National Highways.
<b>Employment</b>	
<p><b>Employment land requirements:</b> In respect of employment land requirements set out in Policy 22, the 12.3ha referenced is not the identified employment land need at Salisbury. The Employment Land Review (para 6.2.11) states that at Salisbury and Wilton there is cumulative demand for up to 5.6ha for Offices and 4.3ha for industrial, resulting in a cumulative demand of up to 9.9ha. A requirement above the indicative demand for employment land can, as the Planning for Salisbury paper recognises, provide for choice and flexibility over the plan period to meeting identified needs. However, in the context of Salisbury this 'over-supply' must be balanced against a significant housing delivery shortfall.</p>	Persimmon Homes (South Coast) Ltd.
<p><b>Wilton:</b> It is not clear why Policy 22, which relates specifically to the Salisbury Principal Settlement, includes within its employment land requirement the provision for Wilton. Wilton is now separate from the housing requirements for Salisbury and is classified within the Salisbury Rural Area</p>	Persimmon Homes (South Coast) Ltd.

Key issues raised (Policy 22 - Salisbury Principal Settlement)	Respondent(s)
<p><b>Inconsistency in status of employment allocations:</b> The reference to employment land at Old Sarum within Policy 22 is considered appropriate. However, it is noted that it is proposed that saved policies H2D and E1 are deleted. However, within the Planning for Salisbury paper it states that: "<i>The Local Plan will ensure that existing allocations for employment use, for example those at...Old Sarum ('saved' policy E1) continue to be retained for such purposes</i>". There is an obvious inconsistency and this should be addressed to ensure the status of employment land at Old Sarum is clarified. Whilst we do not object to the deletion of relevant policies from the Salisbury District Plan 2011 (i.e. H2D and E1), on the basis that these are replaced by WLP Policy 22, we are concerned with how Policy 22 identifies this land for employment. Policy 22 identifies Old Sarum as continuing to provide for employment, but the reference to this site is as an "<i>existing allocation</i>". The interactive Policies Map also identifies the Old Sarum development site as an '<i>existing allocation</i>'. It is not adequately explained how this '<i>existing allocation</i>' remains an allocation when the corresponding saved policy is to be deleted. Moreover, the Local Plan does not propose to include a specific policy related to this land, it simply refers to it within the main policy for the Salisbury settlement.</p>	Persimmon Homes Wessex.
<b>Coalescence</b>	
<p><b>Policy support:</b> Strongly support Policy 22 section 4 in maintaining separation and distinctiveness between Salisbury and Wilton Parish. It is imperative that the town of Wilton does not become subsumed into the urban expansion of Salisbury.</p>	Individuals x10; Wilton Town Council.
<b>Network Rail</b>	
<p><b>Policy support:</b> Network Rail believe this Policy to be sound and are supportive of the identification of the development potential in Salisbury. Network Rail note the inclusion of the rail station as an opportunity site and are supportive of this. Network Rail are undertaking the Salisbury Area Strategic Study which is examining requirements at Salisbury, aligning with a number of strategic considerations in the area. These include resignalling works which are planned for delivery in Control Period 8 (2029-2034), SWR's diesel fleet replacement, and ongoing strategic work on both Wessex and Western routes.</p>	Network Rail.
<b>Salisbury Central Area Framework</b>	
<p><b>Central Area Framework:</b> The Central Area Framework is no longer wholly relevant or reliable.</p>	Salisbury City Council.
<p><b>Approach to city centre:</b> Whilst our client generally supports the approach in Policy 22, this policy does not set out the specific approach to the city centre. Reference is made to measures within the Central Area Framework, however, and it is recommended that these should be explicitly stated in the policy or supporting text in order for the Policy to be effective.</p>	Railway Pension Nominees Ltd.
<b>Churchfields (Policy 34)</b>	

Key issues raised (Policy 22 - Salisbury Principal Settlement)	Respondent(s)
<p><b>Approach to Churchfields:</b> Salisbury City Council disagrees with the approach to focus more commercial development at Churchfields. This policy promotes the wrong kind of development (commercial) in an area that would be better for mixed use development. It fails to acknowledge the transport issues caused by the current location and uses of this estate.</p>	<p>Salisbury City Council; Cycling Opportunities Group Salisbury.</p>
<p><b>Maltings/Central Car Park (Policy 33)</b></p>	
<p><b>Maltings/Central Car Park:</b> The Maltings is a policy arising from Core Strategy Core Policy 20. It has not been delivered and its future is uncertain. The Maltings Masterplan is based on a retail-led approach that is widely considered to be inappropriate at the current time. There is no revised masterplan in the LPR evidence base and since the current masterplan has proven to be undeliverable, this policy is entirely unjustified. This site has the potential to provide at least 200 affordable brownfield homes which would particularly benefit the elderly and first time buyers.</p>	<p>Salisbury City Council.</p>
<p><b>Omission site - High Post</b></p>	
<p><b>High Post:</b> Spitfire Enterprises Ltd has land interests adjacent to High Post Business Park. The Local Plan Review does not identify sufficient employment land allocations, despite sites such as this being suitable and immediately available for employment development. Despite the clear findings of the Employment Land Review (ELR), Policy 22 provides no new employment land allocations within the principal settlement of Salisbury.</p>	<p>Spitfire Enterprises Ltd.</p>
<p><b>Area of Search - New Community</b></p>	
<p><b>Need for site to be allocated now:</b> Reliance cannot be placed upon a potential new community, including the 300 dwellings indicated in the trajectory to be delivered during the plan period, to fully meet the housing need which is being underprovided by this Local Plan. For a new community to make an effective contribution towards the supply of housing during the plan period there is a need for such a site to be identified and allocated now. The Area of Search is not relied upon to make any significant contribution to housing supply in the plan period. How this notional figure of 300 is accounted for (or not) within the housing trajectory is not adequately explained.</p>	<p>Hallam Land Management; Persimmon Homes (South Coast) Ltd.</p>
<p><b>National Landscape:</b> Concern that the area of search identified includes the National Landscape and Dark Sky reserve, which is not mentioned.</p>	<p>Cranborne Chase Area of Outstanding Natural Beauty.</p>
<p><b>Housing allocations at Harnham and Britford (Policies 26, 27, 28)</b></p>	

Key issues raised (Policy 22 - Salisbury Principal Settlement)	Respondent(s)
<p><b>Objections to housing site allocations at Harnham and Britford:</b> on the grounds of potential traffic congestion, highway access, road safety concerns, accessibility of local services, availability of brownfield sites elsewhere in the city, sustainability, climate change, biodiversity, heritage, flood risk, coalescence and landscape impacts on Ebble Valley and AONB. Sites should be removed from the Plan.</p>	<p>Individual x300; Britford Parish Council.</p>
<p><b>Housing allocation - Land East of Church Road, Laverstock (Policy 30)</b></p>	
<p><b>Policy objections:</b> Objections to this proposed allocation due to increase in traffic along Church Road and adverse impacts on landscape and wildlife</p>	<p>Individuals x10.</p>
<p><b>Increase capacity of site:</b> Although Hallam Land Management (HLM) is supportive of the principle of the proposed housing allocation of land to the east Church Road, Laverstock, objection is made to the estimated capacity specified in Policy 30. The amendment sought is to increase the estimated capacity of the site to “approximately 135 dwellings” which would make the policy more effective.</p>	<p>Hallam Land Management.</p>
<p><b>Policy support:</b> Commend the development in Laverstock at Church Road. More housing is essential, and those that complain locally are blockers to progress</p>	<p>Individual x10.</p>
<p><b>Housing allocation - Land North of the Beehive Park &amp; Ride (Policy 25)</b></p>	
<p><b>Concept Plan inconsistencies:</b> The Concept Plan (Figure 4.18) which relates to the proposed allocation of Land North of Beehive Park and Ride identifies proposed new Public Rights of Way within the employment land area which forms part of the saved allocation H 2D/E1. Such provision does not form part of either the allocated policy or the subsequent outline planning application. As such, there is concern that the Concept Plan will impose requirements on land which does not form part of the allocated land north of Beehive Park and Ride and in doing so, frustrate the delivery of employment land pursuant to the provisions of the saved policy H2 D/E1.</p>	<p>Persimmon Homes Wessex.</p>
<p><b>Increase site capacity:</b> Whilst the allocation is supported, the site is capable of delivering up to 115 dwellings in the context of known constraints and an appropriate density for its location.</p>	<p>Redrow Homes.</p>
<p><b>Housing allocation - Land North East of Old Sarum (Policy 23)</b></p>	
<p><b>Policy support:</b> Vision Document and concept masterplan demonstrate how this site can provide a logical and coherent extension to the existing Old Sarum development area.</p>	<p>Bloor Homes (South West) Ltd.</p>
<p><b>Unsustainable location:</b> The continued development of this type of location is likely to result in sprawled infill development and associated services and facilities which do not relate physically or functionally to an existing main settlement.</p>	<p>Metis Homes.</p>

Key issues raised (Policy 22 - Salisbury Principal Settlement)	Respondent(s)
<b>Housing allocation - Land North of Downton Road (Policy 26)</b>	
<b>Policy support:</b> Persimmon Homes (South Coast) Ltd, as promoter and developer of this site, support the inclusion of this site within Policy 22, recognising that Land North of Downton Road provides a genuine opportunity to provide for a significant level of development in support of meeting future needs at Salisbury.	Persimmon Homes (South Coast) Ltd.
<b>Maintaining separation and distinctiveness:</b> Salisbury City Council supports maintaining separation and distinctiveness between Salisbury and Britford and considers that this logic should have been used in site selection with regard to land north of Downton Road.	Salisbury City Council.
<b>Omission site - Quidhampton Quarry</b>	
<b>Allocate for housing:</b> Paragraph 123 of the NPPF requires local planning authorities to take a positive approach to applications for alternative uses of land, which is currently developed, but not allocated for a specific purpose in plans, such as Quidhampton Quarry, where this would help to meet identified development needs. The site has been suitably assessed for housing, and by overcoming the access implications the site could deliver a considerable amount of much needed housing within Salisbury and Wiltshire.	Quidhampton Developments Ltd.
<b>Omission site - Site 7 South of Downton Road</b>	
<b>South of Downton Road:</b> The Reg 19 WLPR should allocate 7.26 ha that formed part of the old Site 7. The Reg 19 Sustainability Appraisal (SA) fails to assess properly Site 7 to assist with housing delivery at Salisbury.	Benchmark Planning.
<b>Omission site - Land South of Netherhampton Road</b>	
<b>Land South of Netherhampton Road:</b> This site forms a logical extension to Vistry's residential, mixed-use development at Wilton Gate and adjacent to the approved residential development at Chapel Gate. Policy 22 should be amended to include an additional residential allocation for 600 homes on Land South of Netherhampton Road, Salisbury.	Vistry Group.
<b>Omission site - Land North of Netherhampton Road</b>	
<b>Land North of Netherhampton Road:</b> Policy 22 should be amended to include an additional residential allocation for 450 homes on Land North of Netherhampton Road, Salisbury.	Vistry Group.
<b>Omission site - Old Sarum Airfield</b>	
<b>Reinstate Core Policy 25:</b> Request that Core Policy 25 be reinstated and carried forward into the Local Plan Review as a saved policy	Old Sarum Airfield Ltd.

Key issues raised (Policy 22 - Salisbury Principal Settlement)	Respondent(s)
<p><b>Support deletion of Core Policy 25:</b> Support the Council's deletion of WCS Core Policy 25 relating to the airfield. It is out of date, any development would cause harm and the site is of national importance.</p>	<p>Individuals x10.</p>
<p><b>Omission site - Ford Farm Net Zero New Community</b></p>	
<p><b>Ford Farm Net Zero New Community:</b> The Wiltshire Local Plan Review is too vague about the identification and delivery of the "Salisbury area new community" and should be amended to allocate Ford Farm Net Zero New Community.</p>	<p>Benchmark Planning.</p>
<p><b>Omission site - Land at Britford Lane, Harnham and Land adjacent to Salisbury District Hospital</b></p>	
<p><b>Land at Britford Lane, Harnham and Land adjacent to Salisbury District Hospital:</b> Two major sites which are capable of accommodating a large number of homes in the plan period are Land at Britford Lane, Harnham and Land adjacent to Salisbury Hospital. These should be included as allocations in the Local Plan.</p>	<p>Longford Estate.</p>
<p><b>Omission site - Fugglestone Red (employment land Parcel F)</b></p>	
<p><b>Fugglestone Red employment land (Parcel F):</b> it is no longer justified to rely on this land area to deliver employment as envisaged within the extant allocation policy (Wiltshire Core Strategy Core Policy 20). The Local Plan must take a proactive approach in the context of housing need and where appropriate, support the alternative uses of land which have remained undeveloped.</p>	<p>Persimmon Homes (South Coast) Ltd.</p>

Table 5.35 [Policy 23 - Land North East of Old Sarum, Salisbury] key issues

key issues raised (Policy 23 - Land North East of Old Sarum, Salisbury)	
<b>Landscape Impacts</b>	
<b>Monarch's Way:</b> This site is unsuitable for development due to its potential adverse impacts on the local landscape, in particular Monarch's Way.	Individuals x10.
<b>Landscape sensitivity:</b> Due to the landscape sensitivity of this site we believe that the proposed allocation of 350 dwellings on this site is too high. This scale of development will prevent sufficient mitigation of the impact on Monarch's Way and in particular require the use of higher elevation land which will create a prominent urban edge to the Salisbury settlement. We draw attention to the Landscape Sensitivity Assessment prepared by Landshape Design for the Laverstock and Ford Neighbourhood Plan.	Laverstock and Ford Parish Council.
<b>Lack of local amenities</b>	
<b>Lack of local services/amenities:</b> One of the most frequently expressed concerns by local residents is about the lack of facilities and amenities within the area which given the geographic location of the site and lack of bus services within the Longhedge estate result in frequent car journeys to access essential health services and there is also a need for a wider range of other amenities which are currently only represented by two convenience stores and three food outlets - there is no medical centre, dentist or pharmacy in the area. The policy needs to be modified to add specific mitigations to encourage the provision of these facilities.	Laverstock and Ford Parish Council; Individuals x10.
<b>Heritage</b>	
<b>Heritage impacts/opportunities:</b> The Council clearly consider that the site proposed to be allocated under Policy 23 would be subject to the same issues as Old Sarum Airfield in relation to the Conservation Area and the Scheduled Monument, otherwise consideration would not be written into the policy. However, the allocation would not provide anywhere near the same level of opportunities to heritage assets in the area like the allocation of Old Sarum Airfield.	Old Sarum Airfield Ltd.
<b>Figsbury Ring:</b> The National Trust owns Figsbury Ring, a scheduled monument with far-reaching views across the landscape. Figsbury Ring is located some 2.5 km to the east of this proposed allocation. We question the soundness of Policy 23 in its current form. We note that the policy has a bullet point about assessing the effects and avoiding unacceptable harm to the setting of Old Sarum Scheduled Monument and Old Sarum Airfield Conservation Area. However, Figsbury Ring is only marginally further from the allocation site than Old Sarum. Figsbury Ring should also be referred to in the policy, or at least <i>'other scheduled monuments in the wider landscape'</i> .	National Trust.
<b>Transport evidence</b>	



<b>key issues raised (Policy 23 - Land North East of Old Sarum, Salisbury)</b>	
<b>Transport mitigation:</b> Policy 23 is not sound as it does not sufficiently address mitigation for the additional demand of c350 additional dwellings on the road infrastructure. The apparent reliance on improvements to bus and cycling as a mitigation will not sufficiently address the already high traffic load on the Castle Road for access to schools and south for the city, north through to the A303 and from this site east onto the A30.	Benchmark Planning; Individuals x10; CPRE South Wiltshire Group.
<b>Salisbury Transport Strategy:</b> Should this policy be adopted, the Salisbury Transport Strategy needs to be updated to reflect the additional traffic movements which will be generated by this site – the development of 350 houses at this remote location is likely to have significant effects on traffic and air quality on Castle Road and in the city of Salisbury.	Cycling Opportunities Group Salisbury.
<b>Transport</b>	
<b>Traffic:</b> Concern about additional traffic problems in the parish.	Individuals x10.
<b>Car dependency:</b> This proposed development is likely to result in car-dependent residents unless a frequent and reliable bus service and high quality cycling links are provided at the time it is first occupied. So far, with previously completed housing developments, this has not happened, despite measures for mitigation of traffic and modal shift to sustainable transport being deemed necessary in the Local Transport Plan and the Salisbury Transport Plan.	Individuals x10.
<b>Local cycle network:</b> The local cycle network is incomplete and largely aspirational and will require considerable investment to provide the kind of high quality routes necessary to make active travel the method of choice for any journey.	Individuals x10.
<b>Access:</b> Concern that the proposed access to the site is almost directly opposite the access Throgmorton Hall, and that any necessary junction arrangements will interfere with access to Throgmorton Hall.	Individuals x10.
<b>Historic England</b>	
<b>Impacts on heritage assets:</b> There is significant archaeology present on, and adjacent to the site. It would be helpful to know that the local authority heritage expertise are comfortable with the caveats provided in the policy to enable affected assets to be conserved in a manner commensurate with their significance and to limit harm to the setting of the Ende Burgh Barrow, and other affected assets in and beyond.	Historic England; Individuals x10
<b>Natural England</b>	
<b>Green Infrastructure:</b> Natural England supports the inclusion of 7.1 hectares of green infrastructure within the concept plan but recommends this requirement is set out in the policy as a minimum area requirement for the scheme.	Natural England.

key issues raised (Policy 23 - Land North East of Old Sarum, Salisbury)	
<b>Buffers:</b> Natural England supports the policy requirement to implement buffers but recommends the minimum buffer width of 30m as set out in the concept plan is specified in the policy.	Natural England.
<b>Phosphates</b>	
<b>Nutrient neutrality:</b> Policy 23 of the Local Plan specifically includes a requirement to neutralise levels of phosphates entering the SAC. Wiltshire Council currently operates a scheme whereby planned development (i.e. development on sites allocated in the adopted Local Plan) can mitigate its phosphate impacts through developer contributions. There is little detail at this time to explain how sites, such as Policy 23, which are allocated for development will benefit from this strategic mitigation. Such clarity is needed in order to provide the appropriate mechanism for securing necessary mitigation related to the River Avon SAC.	Blue Fox Planning for Bloor Homes (South West) Ltd.
<b>Nutrient neutrality:</b> In relation to the River Avon SAC - the measures should demonstrably be able to “neutralise” the levels of phosphates beyond reasonable scientific doubt, not simply be “aimed” at doing so - this wording should be strengthened.	Laverstock and Ford Parish Council.

Table 5.36 [Policy 24 - Land at Netherhampton Road Garden Centre] key issues

Key issues raised (Policy 24 - Land at Netherhampton Road Garden Centre)	Respondent(s)
<b>Policy 24: Land at Netherhampton Road Garden Centre</b>	
<b>Policy support:</b> Strongly support Policy 24 for approximately 60 homes but consider that the draft Local Plan should be taking a more positive approach to housing delivery within Salisbury. Policy 24 establishes the principle of residential development at this location; however, Vistry consider the Policy is limited in terms of the quantum of housing proposed. The Garden Centre site would be better delivered alongside the allocation of the Land South of Netherhampton Road which would allow for a more comprehensive development.	Vistry Group.
<b>Isolated location:</b> Land at Netherhampton Garden Centre, while close to an emerging large development, is still in an isolated location and the proximity to the cattle market is not compatible with a residential area. Policy 24 asserts that this site is near an emerging Local Centre - other than a Primary School and a Country Park where is the evidence that it will in fact be a Local Centre? There is no bus service proposed to serve this site, either to Salisbury or Wilton from which it is equally distant. Existing cycleways do not reach it and there is no pavement.	Individuals x10.
<b>Efficient use of land:</b> Support the principle of identification of land at Netherhampton Road Garden Centre for residential development. It does not make efficient use of land and it does not maximise the use of a previously-developed site. On a site of over 3 Ha it ought to be feasible to accommodate at least 100 dwellings.	Go South Coast Ltd.
<b>Site not deliverable:</b> Site appears to have been submitted to SHELAA prior to being sold to current landowner. The current user is not intending to develop the site so it is not deliverable.	Individuals x10.
<b>Flood risk</b>	
<b>Sequential Test:</b> The allocation of this site has been done without properly undertaking the sequential test as your current sequential test only considers Flood Zone 2 and 3/EA objection matters; and/or for site 10, appears to have been carried out for a much larger site than the current allocation. The current site 10 allocation is entirely in a high Ground Water Risk area according to your own SFRA.	Individuals x10.
<b>Settlement distinctiveness/coalescence</b>	
<b>Coalescence:</b> This site allocation does not accord with the Plan's strategy to maintain distinctiveness between Salisbury and Netherhampton.	Salisbury City Council; Individuals x10.
<b>Landscape</b>	

Key issues raised (Policy 24 - Land at Netherhampton Road Garden Centre)	Respondent(s)
<b>Proximity to National Landscape:</b> Object to the inclusion of Land at Netherhampton Road Garden Centre due to its proximity to Cranborne Chase National Landscape.	Individuals x10.
<b>Highways/Transport evidence</b>	
<b>Traffic volumes:</b> This site will add still further to the traffic congestion along Netherhampton Road leading to the Harnham Gyratory and Park Wall.	Salisbury City Council; Individuals x20; Cycling Opportunities Group Salisbury.
<b>Extended bus services:</b> The Section 106 Agreement for the Wilton Gate development has secured a £750,000 contribution towards public transport enhancement and financial support. This is based on extending the R5 bus service west from the Netherhampton Road / Upper Street junction to enter and loop around the Wilton Gate development. It also secures an increase in the frequency of the R5 bus service from 30 minutes to 20 minutes.	Vistry Group.
<b>Highways improvements:</b> We understand that Wiltshire Council was supposed to deliver the improvements to the Harnham Gyratory and New Bridge Road to accommodate the increased traffic from the 640-home development on Netherhampton Road. However, no improvements have been undertaken and we understand that there are none planned. How then can the Gyratory cope with the increased traffic from this development and others planned in Harnham & Britford? It is therefore premature to bring forward sites under Policies 24, 26, 27 and 28 until such time as the IDP and Delivery Plan can demonstrate that there is a deliverable sustainable scheme aligning to LTP4 principles at Harnham Gyratory (including Exeter St roundabout).	Individual x20; Cycling Opportunities Group Salisbury.
<b>Bus services:</b> The combination of this site alongside those already consented along Netherhampton Road is substantial, and as such there is the scope to start to consider if more substantial modification of the network towards the west of Salisbury might be justifiable. It would be prudent to insert language into Policy 24 to require the provision of additional bus stops on Netherhampton Road should the need be justified.	Go South Coast Ltd.
<b>Historic England</b>	
<b>Views of cathedral spire:</b> We note that the SA had considered a much larger site than now proposed and commented on an impact on views of the spire. We assume this is not now the case, especially as the proposed allocation appears not to extend beyond the footprint of the existing business.	Historic England.
<b>Environment Agency</b>	
<b>Groundwater and surface water:</b> These sites are in areas where there may be groundwater and surface water issues that will need to be addressed. Some of these sites will be experiencing higher than usual groundwater levels since the flooding in the River Avon in January. Therefore promoters of these sites should gather information over this year as good baseline data.	Environment Agency.

Key issues raised (Policy 24 - Land at Netherhampton Road Garden Centre)	Respondent(s)
<p><b>Surface water runoff rates:</b> There may be a requirement for betterment on the surface water runoff rates due to identified downstream risk, on which the LPA should seek advice from the LLFA.</p>	Environment Agency.
<p><b>Natural England</b></p>	
<p><b>No objection to principle of allocation:</b> Natural England has no objection to the principle of the allocation and supports the need for a Suitable Alternative Natural Greenspace (SANG) as set put in Policy 29.</p>	Natural England.
<p><b>SANG:</b> It is unclear from the Policy 24 wording whether the SANG area identified in Policy 29 has been secured for this purpose. If it has been secured then the policy should clarify that a contribution to the SANG will be required. If not then there remains uncertainty as to whether the scheme will be deliverable. The Policy and or supporting text should specify that the necessary SANG provision for the development must be secured prior to commencement of the development and the facility open and available to the public by first occupation.</p>	Natural England.
<p><b>Omission site - Land south of Netherhampton Road, Salisbury</b></p>	
<p><b>Land south of Netherhampton Road:</b> This site offers a cohesive extension to the draft allocation at the Garden Centre and the development under construction at Wilton Gate. The site is not dependent on the Garden Centre coming forward for development and can be delivered independently, if required. Whilst the Garden Centre site allocation does sit west of the emerging development at Wilton Gate, the land is not immediately adjoining and is separated by agricultural fields, comprising the land subject to this representation. The Planning for Salisbury recognises the need for the Garden Centre to ‘integrate’ with the existing allocation at Wilton Gate. The land subject to this representation will do that, helping bridge the gap of urban development between the two allocations, forming a logical rounding off to the settlement boundary.</p>	Vistry Group.

Table 5.37 [Policy 25 - Land North of the Beehive Park & Ride, Old Sarum] key issues

Key issues raised (Policy 25 - Land North of the Beehive Park & Ride, Old Sarum)	Respondent(s)
<b>Heritage</b>	
<b>Heritage impacts:</b> The allocation is very visible from the Northern and Eastern slopes of Old Sarum Scheduled Monument. The impact of development needs to be considered alongside new development and cumulative impact on the semi rural setting. The relationship between the site and the setting of Old Sarum needs to be understood to inform site suitability and to minimise harm.	Historic England.
<b>Heritage constraints/opportunities:</b> The proposed site has the same heritage considerations in relation to the Conservation Area and Scheduled Monument as Old Sarum Airfield. The allocation does not provide as many opportunities for heritage assets as the Wiltshire Core Strategy allocation for Old Sarum Airfield (Core Policy 25). The policy should be deleted because Old Sarum Airfield can offer more heritage benefits. The Wiltshire Core Strategy policy on Old Sarum Airfield should be retained.	Old Sarum Airfield Ltd.
<b>Impacts on Old Sarum:</b> There will be negative visual impacts on Old Sarum Conservation Area. A larger green space could be included in the allocation to reduce the impact on views from Old Sarum	Salisbury City Council.
<b>Policy support:</b> The allocation is supported but changes to the Sustainability Appraisal (SA) are suggested. A Heritage Assessment has been undertaken that concludes that designated heritage assets would not be physically impacted. There is intervisibility between the site and Old Sarum but adverse effects are considered to be low. The SA score for heritage should be reduced to moderate adverse effect.	Redrow Homes.
<b>Water</b>	
<b>Potential groundwater/surface water issues:</b> There may be groundwater or surface water issues to address on this site. There have been higher groundwater levels than usual due to flooding in the River Avon in January 2023 - promoters of relevant sites should gather data for this year as it is a good baseline.	Environment Agency.
<b>Surface water run off:</b> There may be a requirement for betterment of surface water run off due to downstream risk - the Local Authority should seek advice from the Lead Local Flood Authority.	Environment Agency.
<b>Transport</b>	
<b>Traffic volumes:</b> The transport evidence base suggests increased traffic on Castle Road. The impact of development on the A345, A36 and Salisbury AQMA should be assessed.	Cycling Opportunities Group Salisbury; Salisbury City Council; Individuals x10.

Key issues raised (Policy 25 - Land North of the Beehive Park & Ride, Old Sarum)	Respondent(s)
<b>Policy support:</b> The allocation is supported. There should be direct and legible pedestrian links to bus services on the Park and Ride site and the A345. The policy and concept plan need to make reference to active travel links across boundaries. The policy should ensure development makes best use of passing frequent bus services on the A345.	Go South Coast Ltd; Individuals x10.
<b>Pedestrian accessibility:</b> Site promoter supports the allocation but suggests the policy should reflect that S106 contributions can be used to achieve pedestrian access to neighbouring development.	Redrow Homes.
<b>Housing</b>	
<b>Housing quantum and self-build:</b> Site promoter supports the allocation but suggests the housing quantum should be increased to 115 dwellings and the policy should not impose a requirement for self-build.	Redrow Homes.
<b>Green Space</b>	
<b>Green infrastructure:</b> Support the inclusion of 2.45 hectares of green infrastructure within the concept plan but recommends this requirement is set out in the policy as a minimum area requirement for the scheme.	Natural England.
<b>Community woodland:</b> Support the use of the adjacent area of mature woodland as a community woodland as identified in the concept plan, however, it is unclear whether the establishment of the community woodland will be a requirement of the development. If it is intended that the community woodland is to be provided by the development this should be secured by appropriate wording in Policy 25. The Concept Plan should also refer to a “Community Woodland” rather than a SANG.	Natural England.
<b>Allotments and site boundary change:</b> Site promoter supports the allocation but suggests there is no evidence for part of the site being allotments and site boundary should be expanded to include the area of woodland to the north of the site.	Redrow Homes.

Table 5.38 [Policy 26 - Land North of Downton Road, Salisbury] key issues

Key issues raised (Policy 26 - Land North of Downton Road, Salisbury)	Respondent(s)
<b>Heritage</b>	
<p><b>Impact on heritage assets:</b> Unacceptable heritage harm is unavoidable. Site is adjacent to two Conservation Areas, an area of archaeological potential and within the setting of Grade 2 listed Bridge Farm. The Britford Conservation Area was created to recognise Britford's distinct character. The church, farms and vernacular buildings in Britford form a tight community which is separate from Salisbury and is in need of preservation. Policy is unsound and unjustified due to lack of Heritage Impact Assessment and inconsistent with national policy.</p>	Britford Parish Council; Individuals x30.
<p><b>Cathedral views and key sightlines:</b> Development on the site will negatively impact views and key sightlines of Salisbury Cathedral. Views of the cathedral are a 'kinetic' experience, therefore the proposed corridor within the development to view the cathedral will not adequately mitigate harm. The impact on heritage, in particular the setting of the cathedral, will impact on tourism.</p>	Salisbury City Council; Individuals x30; Salisbury Civic Society.
<p><b>Heritage impacts:</b> The site is on a key approach to the city with important views of the cathedral spire. Development should preserve and enhance the setting of the spire and views of the spire should not be lost or impaired. A design could preserve and enhance views of the spire. The concept plan shows development parallel to the road interrupting views of the spire and causing significant harm. There is an opportunity to create a framed view from Bridge Farm. Development would likely have an impact on the open rural character of Britford Conservation Area and there should be a separation to avoid this. Grade 2* Registered Park and Garden at Longford Castle should be considered.</p>	Historic England.
<p><b>Water meadow buildings:</b> Historic buildings on the water meadows will not be conserved or enhanced.</p>	Individuals x10.
<b>Landscape</b>	
<p><b>Sense of separation between Salisbury and Britford:</b> Development will undermine the rural settlement pattern, open rural nature and the sense of separation between Salisbury and Britford. The built heritage of Britford and Salisbury is a feature of the local landscape. The allocation will not maintain the sense of separation between Salisbury and Britford village/Conservation Area.</p>	Britford Parish Council; Salisbury City Council; Salisbury Civic Society; Individuals x40.
<p><b>Landscape setting of Salisbury:</b> Development will have an adverse effect on the landscape setting of Salisbury.</p>	Salisbury Civic Society; CPRE; Individuals x10.
<b>Transport</b>	



Key issues raised (Policy 26 - Land North of Downton Road, Salisbury)	Respondent(s)
<b>Local transport network:</b> Improvements to the Harnham Gyrotory and New Bridge Road to accommodate already planned development haven't happened. The gyrotory cannot cope with more development on this site and other sites proposed in Harnham & Britford. There is not a robust, deliverable or costed proposal to address the increase in traffic from this site (and other sites). Transport infrastructure cannot support additional houses.	Individuals x40; Salisbury City Council; Britford Parish Council; Downton Parish Council.
<b>Access onto A338:</b> Access onto the A338 is dangerous. An overriding need or mitigation of the effects of this access should be demonstrated.	Individuals x10.
<b>Traffic impacts on Britford village:</b> Significant impact on traffic through Britford village will result from development of this site.	Individuals x10; Britford Parish Council.
<b>Transport inputs and effects on air quality:</b> The allocation should be deleted because it would require significant transport inputs and have a negative impact on air quality.	Salisbury City Council; Individuals x10.
<b>Emergency services:</b> It is unclear what discussions have been held with healthcare providers regarding the impacts of developing this site on emergency service response times.	Individuals x10.
<b>Creation of 'rat runs':</b> The volume of traffic from the development will create 'rat runs' including though the villages of Odstock and Nunton.	Individuals x10.
<b>Policy support:</b> The site is suitable and sustainable and is supported. It is a compact extension to the city, is only 2.2km from the city centre and the route to the centre is flat. There is good potential for walking and cycling and it benefits from two bus services along Downton Road, as well as public transport links to employment opportunities. However, the policy overlooks requirements for bus stop infrastructure.	Go South Coast Ltd.
<b>Biodiversity</b>	
<b>Buffer:</b> Support the requirement for an ecological buffer to the north and east of the allocation as a means of protecting the ecology of the River Avon. However, the requirement for a minimum buffer should be secured by its inclusion in Policy 26.	Natural England.
<b>Ecologically sensitive site:</b> The site is adjacent to East Harnham Meadows SSSI - the need to protect from potential harmful impacts (e.g. through changes in hydrology, pollution and any potential for increased public access) should be set out in the supporting text and be a requirement of Policy 26.	Natural England.
<b>Ecologically sensitive site:</b> The site is ecologically sensitive. It is bordered by the River Avon SAC, the East Harnham Meadows SSSI and the Britford Water Meadows SSSI. The policy does not address Natural England's concerns. Development will have a negative impact on the water meadows and the SSSI. The 'Coffin Path' footpath between Salisbury and Britford acts as a dark corridor for wildlife.	Britford Parish Council; Individuals x20.

Key issues raised (Policy 26 - Land North of Downton Road, Salisbury)	Respondent(s)
<b>Protection of riverine wildlife corridor:</b> The site or bottom part of the site should be removed to protect the riverine wildlife corridor.	Salisbury City Council.
<b>SANG:</b> It is unclear from the Policy 26 wording whether the Policy 29 SANG has been secured for this purpose - it should be clarified that a contribution to the SANG will be required if it has been secured. The Policy/supporting text should specify that the necessary SANG provision for the development must be secured prior to commencement of the development and the facility open and available to the public by first occupation.	Natural England.
<b>SANG:</b> There is no detail for the practicality of providing Suitable Alternative Natural GreenSpace (SANG). The SANG should be in place before development occurs.	Individuals x10.
<b>Water</b>	
<b>Hydrology and hydrogeology:</b> Independent advice provided on hydrology from Edenvale Young. The site is highly sensitive to changes in hydrology and hydrogeology, whether from climate change or from nearby development. Development at the site would result in a significant increase in volume and rate of runoff of surface water and will exacerbate flooding off site. Before allocation, a full investigation of the hydrological and hydrological characteristics should have been undertaken and a drainage strategy produced to demonstrate that flooding will not be made worse, and if possible it should reduce the risk of flooding off site, particularly to property in Britford. Policy is unsound because it is unjustified and further work is required and it is inconsistent with national policy.	Britford Parish Council.
<b>Groundwater and surface water issues:</b> There may be groundwater or surface water issues to address on this site. There have been higher groundwater levels than usual due to flooding in the River Avon in January 2023 - promoters of relevant sites should gather data for this year as it is a good baseline	Environment Agency.
<b>Surface water runoff:</b> There may be a requirement for betterment of surface water run off due to downstream risk - the Local Authority should seek advice from the Lead Local Flood Authority.	Environment Agency.
<b>Groundwater and surface water issues:</b> The high groundwater and surface water issues on this site mean it should not be developed. Development would lead to an impact on run off, groundwater and the flood plain. Mitigation for flood risk is insufficient.	Individuals x40.
<b>Infrastructure</b>	
<b>Open space:</b> Support the inclusion of 7.2 hectares of green infrastructure within the concept plan, but recommend this requirement is set out in the policy as a minimum area requirement for the scheme.	Natural England.

Key issues raised (Policy 26 - Land North of Downton Road, Salisbury)	Respondent(s)
<b>Lack of infrastructure:</b> There is a lack of infrastructure in general to support this site including: no medical provision, lack of retail, sewerage problems, lack of school provision, employment sites and services are not easy to access by sustainable transport, electricity supply is constrained.	Individuals x40.
<b>Housing</b>	
<b>New community north of Salisbury:</b> A new community north of Salisbury should be considered as an alternative to this site.	Salisbury Civic Society; Individuals x10.
<b>Brownfield first:</b> Brownfield development should be investigated before this proposal.	Individuals x18; Cycling Opportunities Group Salisbury.
<b>Habitats Regulations Assessment</b>	
<b>Policy support for SANG requirement:</b> In the context of the provision of new space to deflect recreation visits to the New Forest designated sites, Policy 26 is supported as it provides a circular walk of 2.3-2.5km to the east of the South Harnham allocation as additional Suitable Alternative Natural Greenspace (SANG).	New Forest National Park Authority.
<b>Comments from site promoter - Persimmon Homes</b>	
<b>Land north of Public Right of Way:</b> The land north of the public right of way is also controlled by Persimmon Homes. This additional land should be incorporated into the concept plan because it could be used for drainage, ecological enhancements, landscaping and open space.	Persimmon Homes.
<b>Concept Plan:</b> Support for the principle of a concept plan in general as one way of meeting policy objectives but that it should not be set in policy.	Persimmon Homes.
<b>Omission site (Site 7 of site selection process - Land South of Downton Road)</b>	
<b>Combine part of Site 7 with Policy 26:</b> Representor has put forward part of site 7 to be combined with this site. It can provide 200 homes on 7.16ha. Site 7 was removed from the site selection process due to comments from Historic England but the new site area should be assessed as an alternative site through the SA. It is suggested the site should be combined into Policy 26 because it will help meet local housing needs, provide better access to the hospital and avoid the use of local rat runs.	Individuals x10.
<b>Petition received</b>	
<b>Petition received:</b> Petition of 1386 signatories objected for the following reasons:	Individual x1386.

Key issues raised (Policy 26 - Land North of Downton Road, Salisbury)	Respondent(s)
<p>1. Loss of distinctiveness of Britford Village. The village is known for the 1600's rural architecture set alongside the watermeadows within the wider setting of Salisbury and the cathedral. This will be impacted negatively by the development of this field. The 2014 conservation statement recognised the 'pastoral serenity' of the setting of the village</p> <p>2. Additional congestion on Downton Road</p> <p>3. Additional flood risk for properties in Britford. There will also be associated sewerage problems as the sewage works are at the same level as Britford.</p>	

Table 5.39 [Policy 27 Land South of Harnham, Salisbury] key issues

Key issues raised (Policy 27 Land South of Harnham, Salisbury)	Respondent(s)
<b>Statutory consultees</b>	
<p><b>Whether SANG area in Policy 29 has been secured:</b> This is unclear from the Policy 27 wording. If it has been secured then the policy should clarify that a contribution to the SANG will be required. If not then there remains uncertainty as to whether the scheme will be deliverable. The Policy and or supporting text should specify that the necessary SANG provision for the development must be secured prior to commencement of the development and the facility open and available to the public by first occupation. The allocation includes the Woodbury Ancient Village Scheduled Ancient Monument as green infrastructure. While Natural England has no objection to this approach, confirmation is needed as to whether this area will be used as SANG and whether this will be in addition to the adjacent area of SANG / Country Park proposed by Policy 29.</p>	Natural England.
<p><b>Green infrastructure and green space buffers:</b> Natural England supports the inclusion of 14.04 hectares of green infrastructure within the concept plan along with minimum 40 m green space buffers but recommends these requirements are set out in the policy as a minimum area requirement for the scheme.</p>	Natural England.
<p><b>Has a HIA been undertaken and available to consider:</b> There is significant archaeology associated with the Woodbury scheduled monument. Policy 27 should include a similar condition to the Ende Burgh Barrow caveat in Policy 23 to ensure that the layout of the development is designed to avoid significant features and ensure development positively responds.</p>	Historic England.
<p><b>Groundwater and surface water issues:</b> Some of these sites will be experiencing higher than usual groundwater levels since the flooding in the River Avon in January. Therefore promoters of these sites should gather information over this year as good baseline data. Additionally, there may be a requirement for betterment on the surface water runoff rates due to identified downstream risk, on which the LPA should seek advice from the LLFA.</p>	Environment Agency.
<b>Greenfield/Brownfield development</b>	
<p><b>The Local Plan lacks justification for proposing the development of new housing on greenfield land:</b> (para 3.41 states that development of small sites gives protection to greenfield site and the land and the development should be minimised), whilst excluding available and suitable brownfield land within Salisbury, including the old Quarry, Gas Works, the Maltings &amp; Central Car Park, Churchfields, park and ride sites, Brown Street/Salt Lane car parks. This will destroy the natural greenfield lands within Salisbury, including the Lime Kiln reserve.</p>	Individual x230; Salisbury City Council; Harnham Neighbourhood Association; Harnham Housing Steering Group; Cycling Opportunities Group Salisbury.
<b>Housing figures</b>	

Key issues raised (Policy 27 Land South of Harnham, Salisbury)	Respondent(s)
<b>Housing figures:</b> (200-300) for the Maltings and Central car park have not been included in the housing allocation for Salisbury. If they were then WC would not need to develop on Sites 8&9.	Individuals x80.
<b>Housing figures:</b> WC has ignored Salisbury's Neighbourhood Plan which states that between 2,250 and 2,850 'windfall' homes could be delivered over the 18-year Plan period, meaning you wouldn't need to build on greenfield land, such as that on Site 8. Wiltshire Council has only made provision for 350 homes in the Local Plan over 15 years whereas the number should be nearer 1,000. Salisbury Council's Neighbourhood Development Plan says that over 770 homes were developed on brownfield land over the last 5 years. However, Wiltshire Council only have 60 homes in the Local Plan over 15 years.	Individuals x110; Harnham Housing Steering Group.
<b>Housing figures:</b> The allocation of large-scale employment growth areas in Salisbury to the north, such as Porton, Fugglestone, Old Sarum, and Quidhampton Quarry, raises questions about the suitability of sites in the south Harnham area to serve these employment hubs. To align with forecasted employment growth and promote sustainable development, it is recommended to consider a reduction in planned housing numbers for Salisbury by 5-10%, equivalent to 225-450 homes.	Individuals x10.
<b>Military housing:</b> Wiltshire Council should work with the military to utilise empty military properties.	Individuals x10.
<b>Affordable Housing Provision / Employment</b>	
<b>Affordable homes provision:</b> Site 8 and 9 will only deliver, at the most, 40% of the requirement for social and affordable homes needed to accommodate those for whom the need for housing exists, with the largest proportion of housing (60%) being better quality and more expensive homes attracting buyers from outside the area who will commute to their place of employment.	Individuals x10.
<b>Employment:</b> Salisbury has low unemployment (2.3%) and the highest demand is for lower-skilled or entry-level jobs in sectors such as retail and hospitality. These jobs will not provide the salaries for the majority of homes proposed on sites 8 and 9.	Individuals x10.
<b>Employment:</b> Plan needs to deliver homes aligned to job growth as outlined in Policy 21. Sites 8 and 9 do not deliver homes close to areas of "job growth". Homes need to be located North of Salisbury where transport links etc are promoting job growth but the Plan fails to identify employment opportunities. In addition, "New homes need to be delivered at appropriate, sustainable locations and MUST be supported by necessary improvements in Infrastructure." Development of sites 8 and 9 do not meet these criteria, the sites are remote from diverse employment, requiring car transport, non-vehicular access to the City is not practical, and there are nor realistic plans to significantly improve the infrastructure in the area.	Individuals x20.

Key issues raised (Policy 27 Land South of Harnham, Salisbury)	Respondent(s)
<p><b>Employment and transport/Climate:</b> Are the sites in south Harnham well-placed to support these job hubs given the travel distances? There is no guarantee sustainable transport will be used and so what implications does this have for transportation infrastructure and its alignment with the Government's Net Zero Strategy for promoting cycling and walking to work?</p>	<p>Individuals x10.</p>
<p><b>Traffic and congestion</b></p>	
<p><b>Traffic:</b> Development of the site would cause more traffic, congestion and air pollution, including at Harnham, Britford, Homington, Odstock, Nunton, Coombe Bissett, Rockbourne, Downton, Southampton Road, College roundabout, Old Blandford Road etc. / concern about impacts on emergency service response times as a result of increased traffic / It is unlikely that 10% of journeys will be made using sustainable transport or that 23% of journeys will be made without using a car / There is a lack of detailed evidence about improvements to Harnham Gyratory (which will be at 97% capacity according to Transport Evidence base) and nearby road networks, as well as no evidence of plans to address the subsequent increase in traffic as a result of sites 8&amp;9.</p>	<p>Individuals x280; Harnham Neighbourhood Association; Salisbury City Council; Downton Parish Council; Harnham Housing Steering Group; Cycling Opportunities Group Salisbury.</p>
<p><b>Preliminary road improvement plans:</b> called the "Salisbury Transport Strategy Refresh," have emerged. However, they fall short in several ways: they don't address traffic congestion adequately, neglect the impact of Sites 8 and 9, have a limited planning horizon of 2026 instead of 2038, and lack funding. Given limitations and funding gaps, the integration of Sites 8 and 9 into the plan is questioned.</p>	<p>Individuals x10.</p>
<p><b>Transport infrastructure funding</b></p>	
<p><b>Transport Infrastructure Funding:</b> The proposal to improve the Harnham Gyratory will cost around £19 million, which is not affordable given the available funding of £1.5 million.</p>	<p>Individuals x100.</p>
<p><b>Transport Infrastructure Funding:</b> The Infrastructure and Mitigation Requirements for the site proposed under Policy 27 fails to include funding of a scheme at Harnham Gyratory and Exeter St roundabout to provide extras vehicular capacity, bus priority and cycling and walking provision to LTN 1/20 standard. There is a notable absence of detailed and costed plans for crucial amenities within Policy 27. Specifically, there is no provision for accessible primary school places, safe cycle paths, significant road improvements, or a funded regular bus service for these sites. The IDP does not contain deliverable schemes within the plan period to support housing growth in Harnham.</p>	<p>Individuals x20.</p>
<p><b>Highway access and safety</b></p>	
<p><b>Highway access and safety:</b> According to the Sustainability Appraisal (Site 8, Objective 11) access "may not be achievable" and that a second access is required, but the Local Plan seems to have over looked this, as access to sites 8&amp;9 is currently proposed as either a roundabout or traffic lights on Coombe Road (A354) on a blind bend, downhill. The Local Plan and Sustainability Assessment thus present no justification that Site 8 is</p>	<p>Individuals x250; Harnham Housing Steering Group; Salisbury City Council.</p>

Key issues raised (Policy 27 Land South of Harnham, Salisbury)	Respondent(s)
<p>deliverable without secondary access. Concern that vehicular access would involve a new direct access to the national primary route network/major road network, not permitted under WLP Policy 72. There is also concern over pedestrian access across Coombe Road, where the footpath is unsighted. This is dangerous and will likely be an accident blackspot. Additionally, the Appraisal indicates that a roundabout is feasible only if both Sites 8 and 9 are developed together; otherwise, traffic lights will be necessary. Both options will exacerbate traffic congestion on the A354 and the Gyratory. Development of Sites 8&amp;9 would mean that many, notably students, would have to travel from one side of the city through the centre or around the most congested and unsafe arteria routes. Walkability/travel of these routes has also not been considered with the steep hill, despite being "reasonably well connected". There are also no plans to provide safe or sustainable travel, cycle lanes or pushchair friendly, safe routes to school from the top of Harnham Hill.</p>	
<p><b>Sustainable transport</b></p>	
<p><b>Sustainable transport:</b> Policy 27 has not considered the needs of everyone who uses public transport. A bus service which runs every 2 hours Monday-Friday with a restricted service on Saturday and nothing on Sunday is not sufficient to fulfil their needs. In addition, local buses do not run until after 9am and there are no public transport services on the A354. The Local Plan has not, therefore, fully explored opportunities to promote public transport use thus overestimating sustainable travel modes as per para 104 of NPPF.</p>	<p>Individuals x30; Salisbury City Council; Harnham Housing Steering Group.</p>
<p><b>Sustainable transport:</b> Wiltshire Council's expectation of a minimum 23% non car mode share across the county appears implausible, given the substantial reliance on cars to reach employment areas, especially for those commuting from rural or non-public transport-connected regions. Sites 8 &amp; 9 are too remote from the city centre, supermarkets, schools, GPs, dentists and employment hubs and it is unlikely people will walk or cycle as is the case with the residents who already live near those locations.</p>	<p>Individuals x100</p>
<p><b>Sustainable transport:</b> In order to be consistent with NPPF paragraphs 103-111, and the draft policy 71 "Transport and New Developments" we consider that a bus service operating at least every 30 minutes Monday-Saturday represents a reasonable baseline level of service to present a relevant choice. This approach is broadly consistent with the Salisbury Transport Strategy. Broadly all these objectives are achievable in the proposed allocation.</p>	<p>Go South Coast Ltd.</p>
<p><b>Transport Evidence Base</b></p>	
<p><b>Transport Evidence Base:</b> Modelling uses county-wide projections rather than traffic counts for Salisbury, raising concerns about the accuracy of data. Additionally, the absence of recent counts for New Harnham Road and Netherhampton Road in the evidence underlines potential gaps in the information provided. The Transport Evidence Base 2022's modelling data is criticised for weaknesses, as it fails to adhere to Department for Transport (DfT) modelling guidance, rendering it unreliable for drawing conclusions, such as how the model</p>	<p>Individuals x30.</p>



Key issues raised (Policy 27 Land South of Harnham, Salisbury)	Respondent(s)
<p>responds to traffic congestion. There are concerns that there is conflicting information between the Local Plan, Transport Evidence Base, and Revised Spatial Strategy 2023 regarding whether the specific impact of Sites 8 and 9 has been incorporated into the traffic modelling thus far.</p>	
<p><b>Environmental, landscape and biodiversity impacts</b></p>	
<p><b>Environmental, landscape and biodiversity impacts:</b> There is no indication within the Plan as to how environmental impacts will be mitigated. Development of sites 8&amp;9 will result in the loss of natural features, wildlife and habitats, protected trees and increase noise and light pollution and reduce air quality. The Lime Kiln Area is a frequent dog walking location will be impacted by development. Development will impact the setting of the National Landscape as an International Dark Skies Reserve and remove the natural green space adjacent to Lime Kiln and the Plan lacks evidence on the necessary mitigation measures for this. The proposals for Sites 8&amp;9 do not comply with the Government Guidance in 'A Green Future - Our 25 Year Plan to Improve the Environment', or national policy which requires local planning policies to contribute to and enhance the natural and local environment. There is concern over the lack of biodiversity and ecological evidence used to inform the site selection process and concept plans.</p>	<p>Individuals x130; Harnham Housing Steering Group.</p>
<p><b>Environmental, landscape and biodiversity impacts:</b> Why do Policies 27 and 28 stipulate a biodiversity net gain of only 10% for Sites 8 &amp; 9, while Policy 89 necessitates a 20% gain?</p>	<p>Individuals x10.</p>
<p><b>Environmental, landscape and biodiversity impacts:</b> Concerns that a SANG cannot be effectively established given the guidance from Wessex Archaeology which limits the use of the SANG to activities like fencing, gardening, and tree planting</p>	<p>Individuals x10.</p>
<p><b>Environmental, landscape and biodiversity impacts:</b> The inclusion of Policy 27 (Site 8) in the Local plan is not consistent with Policy 91, or with the NPPF Section 185 where it states that planning policies should 'b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason'. Development of sites 8&amp;9 does not conserve the natural beauty of the National Landscape and their setting, and therefore conflicts with Policy 91 and the NPPF</p>	<p>Individuals x10.</p>
<p><b>Environmental, landscape and biodiversity impacts:</b> Concerns that given the sloping terrain of the site, sites 8&amp;9 will be the first large development viewable from the Ebble Valley, National Landscape, and Dark Skies reserve, which has not been considered</p>	<p>Individuals x10, Salisbury City Council.</p>
<p><b>Environmental, landscape and biodiversity impacts:</b> The Plan fails to establish the correct distance to the National Landscape, which questions if the impact of Site 8 to the National Landscape has been accurately assessed. The boundary of the Cranborne Chase National Landscape is the River Ebble, which is within 1km of the southern boundary of Site 8 (instead of the erroneous 2km stated within the Local Plan). This development</p>	<p>Individuals x 30, Cranborne Chase AONB Partnership.</p>

Key issues raised (Policy 27 Land South of Harnham, Salisbury)	Respondent(s)
<p>will therefore likely have a significant impact on the National Landscape. Policies 27 &amp; 28 should be removed as there is no evidence that they can be delivered in line with Policy 92. It is concerning that sites identified in policies 27 and 28 have been put forward without prior discussion with the National Landscape Partnership. Both would bring development further over the ridge south and south-westwards towards this nationally important National Landscape. The land in question across both sites slopes towards this National Landscape. The effect of that slope is to expose development on that slope to the National Landscape, and makes the integration and screening of development by ground moving, tree and shrub planting more difficult to achieve and to maintain. The potential housing will appear as a substantial urban expansion above the fringing trees on the southern and south-western sides</p>	
<p><b>Environmental, landscape and biodiversity impacts:</b> There is no indication as to how WC can ensure that the Suitable Alternative Natural Greenspace (SANG) is ready before the first residence is occupied in these developments or any plans to position a large car park to accommodate the expected daily visitors to the SANG. In addition, how can WC ensure the SANG car park remains available for SANG visitors, rather than just becoming a free alternative. In addition, there is no plan for the car park within the proposed SANG and there is limited space available to build it without impacting on the Woodbury Ancient Monument</p>	Individuals x10.
<p><b>Environmental, landscape and biodiversity impacts:</b> There is currently no phosphorus mitigation plan for Sites 8&amp;9 despite Policy 27 stating development must include measures aimed at neutralising the levels of phosphates flowing into the River Avon Special Area of Conservation (SAC) to improve water quality. Additionally, the lie of the land is such that any phosphates not neutralised will find their way before any other river into the trout stream River Ebble, which is very picturesque and attractive to walkers as well</p>	Individuals x10.
<p><b>Environmental, landscape and biodiversity impacts:</b> How can the conclusion that Site 8 &amp; 9 have an "ordinary" landscape be drawn from a desktop review without field study? The elevated landscape is continuous with the Area of Natural Beauty (National Landscape) landscape, so how can it be considered 'ordinary'?</p>	Individuals x10.
<p><b>Environmental, landscape and biodiversity impacts:</b> The allocation is inconsistent with the requirement to conserve the historic landscape setting of Salisbury. The proposals would not improve the urban edge and countryside transition on this approach into Salisbury, as this is already established by a belt of mature trees which very effectively screens views of the urban edge. This transitional edge will be lost.</p>	Individuals x10.
<p><b>Environmental, landscape and biodiversity impacts:</b> The land is identified as a Special Landscape Area and is in the sensitive catchment of the River Avon</p>	Cranborne Chase AONB Partnership.

Key issues raised (Policy 27 Land South of Harnham, Salisbury)	Respondent(s)
<p><b>Environmental, landscape and biodiversity impacts:</b> The Avon Valley Path, a regional trail, currently passes through farmland but the experience of using that route for some 2km would be significantly changed passing alongside a major housing development. Similarly, the Public Right of Way heading from Harnham south-westwards towards this National Landscape through open fields would have development on all sides. The concept plan, Fig 4.20 p108, does not indicate how any of those issues above would be overcome</p>	Cranborne Chase AONB Partnership.
<p><b>Environmental, landscape and biodiversity impacts:</b> Policy 29 as currently drafted refers to providing Natural Greenspace as mitigating adverse effects on sites in the New Forest, some distance away and on the far side of the Avon Valley, but there is no proposed mitigation or compensation for development in the setting of Cranborne Chase National Landscape which is much closer</p>	Cranborne Chase AONB Partnership.
<p><b>Environmental, landscape and biodiversity impacts:</b> The provision of the SANG with a car park at an unspecified location will encourage travel across Salisbury by car and will attract additional visitors to what is a fragile habitat. No justification has been provided in the LPR documentation about how impacts on Lime Kiln Down have been taken into account or how potential harm to this habitat will be mitigated</p>	Salisbury City Council; Individuals x10.
<p><b>Environmental, landscape and biodiversity impacts:</b> It is unclear where the proposed car park for the SANG, which this site relies on, is to be located.</p>	Individuals x10.
<p><b>Environmental, landscape and biodiversity impacts:</b> The SANG proposed for this site consists, in part, of the Lime Kiln County Wildlife Site which supports a high range of species, particularly orchids and butterflies. The LPR wording is incorrect regarding the ownership of this site. It is managed by volunteers under the auspices of Salisbury City Council, which owns the central portion of the CWS, with Wiltshire Council owning the rest. This site is relatively small, highly vulnerable and will be subjected to vastly increased recreational pressure which will place unsustainable pressure on the CWS</p>	Salisbury City Council.
<p><b>Environmental, landscape and biodiversity impacts:</b> The other part of the SANG is linked to the Woodbury Ancient Villages archaeological site which lies mainly on the other side of Odstock Road and is agricultural land, already well used by walkers, so classifying it as recreational space confers no additional public benefit. Salisbury's emerging Neighbourhood Plan aspires to see the green sites along this higher edge of Harnham retained as part of a wildlife corridor or nature reserve and potential receptacle for biodiversity net gain, retaining this benefit within the city limits. In the context of this small CWS, green infrastructure should not be confused with provision for play or sport, and habitat improvement will be difficult to combine with increased public access</p>	Salisbury City Council.
<p><b>Infrastructure</b></p>	

Key issues raised (Policy 27 Land South of Harnham, Salisbury)	Respondent(s)
<p><b>School Provision:</b> How will the Plan guarantee adequate capacity at the on-site nursery and where will additional primary school place be made available if they cannot be accommodated elsewhere. Wiltshire Council's draft School Places Strategy 2023-2027 gives the planned capacity of this school as 2 form entry i.e. 420 places for 7 year groups. Sites 8 and 9 would therefore require an immediate and currently unfunded 23% expansion in school capacity. Neither the SA nor the Local Plan present any evidence that this is deliverable. There are no detailed plans as to where the nursery will be situated. There are no detailed plans of the height of the proposed housing/nursery as well as the required type of construction for the Sites 8/9 dwellings. Will each have adequate provisions for mid 21<sup>st</sup>/22<sup>nd</sup> century living, i.e., be eco-friendly, have solar panel roofing and electric vehicle charging points, heat pumps etc? and will this be restricted to that required by Salisbury City's bylaws etc? Education funding should be 100% and paid upfront into an ESCROW account</p>	Individual x40.
<p><b>School provision:</b> There is a lack of clarity about school place availability for the c700 houses currently under construction in Harnham, in addition to new planned development. It is also unclear when new school places will be required and how they will be funded</p>	Individuals x10.
<p><b>Allotments:</b> The policy refers to the provision of an unstated number of new allotments but this is not reflected on the accompanying Figure 4.2, creating inconsistency.</p>	Individuals x10.
<p><b>Other Infrastructure provision:</b> Currently, there is no major supermarket, Medical/Health Centre nor Secondary School on the south side of the City. The scale of the proposals would put increased pressure on local services, such as GP surgeries, Salisbury District Hospital and schools (which are already near/at capacity) without any proposals to expand these or where funding would come from</p>	Individuals x20.
<b>Water/sewerage</b>	
<p><b>Water/sewerage:</b> The area south of Portland Avenue will require the provision of septic tank drainage as there are currently no mains sewerage on that side of the hill. This will require major storage facilities and regular emptying, increasing vehicle movements in the area and also increases the risk of spillage, overflows and possible contamination. The Local Plan additionally lacks adequate details regarding who will cover the costs and the economic feasibility of installing the required pumping facilities to transport a substantial amount of sewage over an extensive distance</p>	Individuals x30.
<p><b>Water/sewerage:</b> The Local Plan lacks clarity regarding the adequacy of surface runoff provision to avert local flooding and its repercussions on the Ebbles Valley. Wiltshire Council has not taken flooding into consideration</p>	Individuals x30.
<p><b>Water/sewerage :</b> The Environmental Agency regard this area as "seriously water stressed", building on the site will add further water stress, making it unsustainable. Yet the list of 'Infrastructure and Mitigation Requirements' in Policy 27 omits the need identified in SA Policy 27 (Para 6.29) for off-site infrastructure</p>	Individuals x20.

Key issues raised (Policy 27 Land South of Harnham, Salisbury)	Respondent(s)
<p>reinforcement for water supply and foul drainage, if this is the case, consideration of this matter should have taken place long before the WDPlan has got to this point, especially considering the site is in close proximity to one of the internationally recognised chalk streams, the River Ebble</p>	
<p><b>Water/sewerage:</b> The main part of the development at site 8 would be at its westerly end which slopes to the south and west towards the Ebble valley. It is envisaged that foul water and sewage would be pumped to one of two possible points on the main sewage network at the junction of Andrews Way and Coombe Road or the roundabout at the junction of Odstock road and Coombe road. Both are over 500 metres and would require a new pumping facility of sufficient capacity to take sewage for nearly 300 houses uphill which require some power and necessarily be costly and take time to construct. Assurances would have to be given that no backing up or overflow could occur in the future</p>	Individuals x20.
<b>Energy</b>	
<p><b>Energy:</b> Demand in and around Salisbury is already high in relation to the capacity of the electricity grid. Building on Sites 8 &amp; 9 will significantly add to the stress on the electricity grid and energy supply, which is critical for all future development. The move to "net zero" moves energy requirements to electrical power, which is not recognised in the plan. There is also no indication as to who will fund this or how it will be provided</p>	Individual x10.
<b>Community Engagement</b>	
<p><b>Community Engagement:</b> Wiltshire Council have failed to comply with its own Statement of Community Involvement by not engaging with residents across Harnham and Salisbury impacted by the proposed development of sites 8&amp;9 / previous consultations did not propose this site as a preferred site / the consultation process has not been user friendly</p>	Individual x260; Harnham Housing Steering Group.
<p><b>Community Engagement:</b> The leader of Wiltshire Council(WC) stated that objections to the Plan must be based on evidence provided in the Plan (Public meeting on 20.09.2023). This task is very difficult when such evidence as exists in the Plan and its associated documents is scanty, frequently contradictory and difficult to access. Freedom of Information requests have been met with partial responses, suggesting the information does not exist; or with the response that the information cannot be supplied as it only exists in draft. This raises the question of whether the Plan can be adequately responded to if it is incomplete and lacks supporting evidence. Additionally, only 10% of FOI requests have been responded to</p>	Individual x40.
<b>Duty to Cooperate</b>	

Key issues raised (Policy 27 Land South of Harnham, Salisbury)	Respondent(s)
<p><b>Duty to Cooperate:</b> Wiltshire Council have not engaged with Salisbury City Council - there is no coherence with the Salisbury Neighbourhood Development Plan and no engagement with Natural England, as evidenced by FOI response from Natural England, with regards to sites 8&amp;9. Equally, there has been a failure to answer 90 % of FOI requests</p>	<p>Individual x20.</p>
<p><b>Duty to Cooperate:</b> Evidence has been provided by Natural England from a FOI request that Wiltshire Council has not engaged with them. We are now at Regulation 14 stage of the process with no engagement with Natural England which is a legal requirement. The process should be stopped until a review has been carried out as to why this has happened and to enable proper engagement</p>	<p>Individual x20.</p>

Table 5.40 [Policy 28 - Land West of Coombe Road, Salisbury] key issues

Key issues raised (Policy 28 - Land West of Coombe Road, Salisbury)	Respondent(s)
<b>Greenfield/Brownfield Development</b>	
<b>Greenfield/Brownfield Development:</b> The Local Plan lacks justification for proposing the development of new housing on greenfield land whilst excluding available and suitable brownfield land within Salisbury - e.g. the old quarry, gas works, Churchfields & Engine Sheds, the Maltings & Central Car Park, Salt Lane car park, Brown Street car park, park and ride sites.	Individuals x210; Salisbury City Council; Harnham Neighbourhood Association; Cycling Opportunities Group Salisbury; Community Group - Harnham.
<b>Neighbourhood Plan/windfall:</b> Concern that the Local Plan ignores Salisbury's Neighbourhood Plan which states that between 2,250 and 2,850 'windfall' homes could be delivered over the 18-year Plan period. Wiltshire Council has only made provision for 350 windfall homes in the Local Plan over 15 years whereas the number should be nearer 1,000. Salisbury Council's Neighbourhood Development Plan says that over 770 homes were developed on brownfield land over the last 5 years. However, Wiltshire Council only have 60 homes in the Local Plan over 15 years.	Salisbury City Council; Individuals x110.
<b>New Community:</b> The Wiltshire Local Plan should already include more detail about the proposed new community north of Salisbury. Before the Local Plan is finalised more work should be done to demonstrate how this community can be delivered, so that the Plan can be demonstrated to be positively prepared and deliverable. Housing numbers for the new community could then be fully justified to be included in the local plan.	Individuals x10.
<b>Self build:</b> The current site plan does not include allocation for self build.	Individuals x10.
<b>Housing numbers</b>	
<b>Housing need:</b> There is a lack of evidence of need for more housing when there has been a significant amount of development at Fugglestone Red, Old Sarum, Longhedge and other sites.	Individuals x10.
<b>Housing numbers:</b> Wiltshire Council intends to build 200-300 houses in the Maltings & Central Car Park. If so, then why aren't these numbers included in the housing allocation for Salisbury? If they were, then you wouldn't need to develop on Sites 8 & 9 in Harnham.	Individuals x80.
<b>Military housing:</b> Wiltshire Council should work with the military to utilise empty military properties.	Individuals x10.
<b>Affordable Housing Provision / Employment</b>	
<b>Employment:</b> Salisbury has low unemployment (2.3%) and the highest demand is for lower-skilled or entry-level jobs in sectors such as retail and hospitality. These jobs will not provide the salaries for the majority of homes proposed on sites 8 and 9.	Individuals x10.

Key issues raised (Policy 28 - Land West of Coombe Road, Salisbury)	Respondent(s)
<p><b>Employment and Transport:</b> Key areas for employment such as Porton Down, Old Sarum, Fugglestone, Andover, Basingstoke Southampton and Swindon are not well connected to Harnham, and will result in increased commuting over long travel distances.</p>	<p>Individuals x20.</p>
<p><b>Traffic/congestion and highway safety</b></p>	
<p><b>Traffic:</b> Development of the site would cause more traffic, congestion and air pollution, including at Harnham, Britford, Homington, Odstock, Nunton, Coombe Bissett, Rockbourne, Downton, Southampton Road, College roundabout, Old Blandford Road etc. / concern about impacts on emergency service response times as a result of increased traffic / It is unlikely that 10% of journeys will be made using sustainable transport or that 23% of journeys will be made without using a car / There is a lack of detailed evidence about improvements to Harnham Gyratory (which will be at 97% capacity according to Transport Evidence base/ Salisbury Transport Refresh) and nearby road networks, as well as no evidence of plans to address the subsequent increase in traffic as a result of sites 8&amp;9. Concern that vehicular access would involve a new direct access to the national primary route network/major road network, not permitted under WLP Policy 72.</p>	<p>Individuals x 280; Salisbury City Council; Downton Parish Council; Harnham Housing Steering Group; Harnham Neighbourhood Association; Cycling Opportunities Group Salisbury.</p>
<p><b>Sustainable Transport:</b> There are no safe pedestrian crossings or footpaths proposed, buggy friendly routes into the city for shopping or local schools, nor safe cycle routes. The location of the sites being over a long, steep hill will also make these sustainable options an unrealistic choice for most people. There are also no plans to provide safe or sustainable travel, cycle lanes or pushchair friendly, safe routes to school from the top of Harnham Hill, which will be unsafe particularly for those (notably students) who would have to travel from one side of the city through the centre or around the most congested and unsafe arteria routes.</p>	<p>Individuals x120.</p>
<p><b>Local Services, supermarket provision and sustainable transport:</b> Currently, there is no major supermarket, Medical/Health Centre nor Secondary School on the south side of the City. The scale of the proposals would put increased pressure on local services, such as GP surgeries, Salisbury District Hospital and schools without any proposals to expand these or where funding would come from.</p>	<p>Individuals x30.</p>
<p><b>Highway access</b></p>	
<p><b>Safety of Highway Access:</b> This site must be considered in conjunction with Site 8 (Policy 27) as they are proposed to have joint access to Coombe Road (the A354) which is not safe, being within 100m of a blind bend for southbound traffic travelling downhill, and within a few metres of the junction with Old Harnham Road and the Homington Road / poor lighting and narrow pavement.</p>	<p>Salisbury City Council; Harnham Housing Steering Group; Individuals x150.</p>
<p><b>Transport Infrastructure Funding</b></p>	



Key issues raised (Policy 28 - Land West of Coombe Road, Salisbury)	Respondent(s)
<p><b>Funding:</b> The proposal to improve the Harnham Gyratory will cost around £19 million, which is not affordable given the available funding of £1.5 million. This is unrealistic, especially as there are no additional buses planned. Concerns that this is why there has been a lack of detailed plans for improving the Harnham Gyratory. The National Highways improvements for the A36 are estimated to cost £6 million and are projected to be completed by 2028. Nevertheless, the absence of confirmed funding from National Highways raises concerns if the improvements are deliverable with the estimated costs for this scheme being upwards of £40 million. The IDP does not contain deliverable schemes within the plan period to support housing growth in Harnham.</p>	Individuals x100.
<p><b>School provision:</b> There is a lack of clarity about school place availability for the c700 houses currently under construction in Harnham, in addition to new planned development. It is also unclear when new school places will be required and how they will be funded.</p>	Individuals x10.
<p><b>Sustainable transport</b></p>	
<p><b>Sustainable Transport:</b> Sites 8 &amp; 9 are too remote from the city centre, supermarkets, schools, GPs, dentists and employment hubs and it is unlikely people will walk or cycle.</p>	Individuals x90; Salisbury City Council.
<p><b>Landscape / Biodiversity</b></p>	
<p><b>Landscape and Screening:</b> Do not support the principle of extending Salisbury's settlement boundary in a south &amp; south westerly direction beyond the high ground of Harnham Hill ridgeline - this prominent site, which is part of a high-quality landscape &amp; setting for Little Woodbury Scheduled Monument &amp; the Cranborne Chase National Landscape, should be retained &amp; protected as part of a downland country park/reserve.</p>	Salisbury Area Greenspace Partnership; Cranborne Chase AONB Partnership.
<p><b>Regional Trail and Public Right of Way:</b> The Avon Valley Path, a regional trail, currently passes through farmland but the experience of using that route for some 2km would be significantly changed passing alongside a major housing development. Similarly, the Public Right of Way heading from Harnham south-westwards towards this National Landscape though open fields would have development on all sides.</p>	Cranborne Chase AONB Partnership.
<p><b>Impact on the National Landscape:</b> The CCAONB Partnership strongly advises that the allocations in policies 27 and 28 are reconsidered with a view to identifying sites that impact less on the National Landscape and the entry to Salisbury on the A354.</p>	Cranborne Chase AONB Partnership.
<p><b>National Landscape and Dark Skies Reserve:</b> The southern boundary of Site 8 is within 1 km of the National Landscape and Sites 8 and 9 have a direct line of sight to this area - concern that the Plan does not address the impact that the development of Sites 8 and 9 will have on the National Landscape/Dark Sky Reserve and does not identify necessary mitigation.</p>	Individuals x500.

Key issues raised (Policy 28 - Land West of Coombe Road, Salisbury)	Respondent(s)
<p><b>Harm to habitat:</b> The provision of the SANG with a car park at an unspecified location will encourage travel across Salisbury by car and will attract additional visitors to what is a fragile habitat / cause air pollution. No justification has been provided as to how impacts on Lime Kiln Down have been taken into account or how potential harm to this habitat will be mitigated from additional pressure from walkers/dogs etc.</p>	Salisbury City Council; Individual x20.
<p><b>Harm to habitat:</b> Part of the proposed SANG is linked to the Woodbury Ancient Villages archaeological site which is already well used by walkers, so classifying it as recreational space confers no additional public benefit.</p>	Salisbury City Council.
<p><b>Biodiversity:</b> Concern about general impacts on wildlife and biodiversity/lack of ecological survey evidence. The Local Plan states that 'Damage or disturbance to local sites will be unacceptable, however there is no indication within the Plan as to how environmental impacts will be mitigated or who is responsible for protecting and enhancing designated and non-designated sites.</p>	Individuals x100; Harnham Housing Steering Group.
<p><b>Bat protection:</b> Foraging bats are indeed to be found around the boundaries of the sites, thanks to interface between hedgerow and grassland. Building on the sites will remove much/all of the grassland and reduce the distance between structures and any remaining hedgerows.</p>	Individuals x10.
<p><b>SANG Contribution:</b> It is unclear from the Policy 28 wording whether the SANG area identified in Policy 29 has been secured for this purpose. If it has been secured then the policy should clarify that a contribution to the SANG will be required. If not then there remains uncertainty as to whether the scheme will be deliverable.</p>	Natural England; Individuals x10.
<p><b>Impact on SANG:</b> There is no indication as to how WC can ensure that the Suitable Alternative Natural Greenspace (SANG) is ready before the first residence is occupied in these developments or any plans to position a large car park to accommodate the expected daily visitors to the SANG.</p>	Individuals x20; Harnham Housing Steering Group.
<p><b>Recreational Space and conserving natural beauty:</b> Despite the proposed Suitable Alternative Natural Greenspace (SANG) sparing the East portion of the site, this does not provide significant additional recreation space, as Lime Kiln CWS is already utilized for recreation.</p>	Individuals x10.
<b>Water and sewerage</b>	
<p><b>Groundwater and surface water:</b> These sites are in areas where there may be groundwater and surface water issues that will need to be addressed. Some of these sites will be experiencing higher than usual groundwater levels since the flooding in the River Avon in January. Therefore, promoters of these sites should gather information over this year as good baseline data. Additionally, there may be a requirement for betterment on the surface water runoff rates due to identified downstream risk, on which the LPA should seek advice from the LLFA.</p>	Environment Agency; Individuals x20.

Key issues raised (Policy 28 - Land West of Coombe Road, Salisbury)	Respondent(s)
<p><b>Water resources:</b> Concerns that the Britford Treatment Centre cannot handle the additional load / would be difficult to connect to from this site. The Local Plan lacks clarity regarding the adequacy of surface runoff provision to avert local flooding and its repercussions on the Ebble Valley / not clear who would pay for this infrastructure - the Local Plan should present evidenced and costed proposals for all water resource management issues, foul drainage and treatment and water run off facilities and treatment, in advance of site allocation.</p>	Individuals x30.
<p><b>Phosphorus mitigation:</b> There is currently no phosphorus mitigation plan for Sites 8&amp;9 despite Policy 28 stating development must include measures aimed at neutralising the levels of phosphates flowing into the River Avon Special Area of Conservation (SAC) to improve water quality. How will the Plan guarantee that the development of these sites will be phosphorus-neutral?</p>	Individuals x10.
<p><b>Duty to Cooperate and Community Engagement</b></p>	
<p><b>Community engagement:</b> Wiltshire Council have failed to comply with its own Statement of Community Involvement by not engaging with residents across Harnham and Salisbury impacted by the proposed development of sites 8&amp;9 / the consultation has not been user friendly / FOIs have not been responded to / have not engaged with Salisbury City Council regarding the forthcoming proposed within the Salisbury Neighbourhood Development Plan / previous consultations did not propose this site as a preferred site / failed in meeting Duty to Cooperate with Natural England.</p>	Individuals x300; Harnham Housing Steering Group.
<p><b>Duty to Cooperate:</b> It is unclear what discussions have been held with healthcare providers regarding the impacts of developing this site on emergency service response times.</p>	Individuals x10.

Table 5.41 [Policy 29 - Suitable Alternative Natural Greenspace, South Salisbury] key issues

Key issues raised (Policy 29 - Suitable Alternative Natural Greenspace, South Salisbury)	Respondent(s)
<b>Policy 29 and supporting text</b>	
<p><b>Lack of clarity:</b> Policy 29 and Figure 4.21 lack clarity in relation to the Lime Kiln Chalk CWS, which comprises about half of the overall SANG provision. It would be helpful to distinguish more clearly between that area (owned by the Council and where there is a greater emphasis on ecological conservation), and the additional land to the south of it which is proposed to be taken out of agricultural use in order to create new recreational / SANG opportunities.</p>	Wyatt Homes.
<p><b>Quantum of SANG:</b> Policy 29 should be clearer as to the quantum of SANG. As drafted there is reference to ‘approximately 18.5ha’ of SANG in paragraph 4.153. It would be helpful to include the same within the wording of Policy 29.</p>	Wyatt Homes.
<p><b>Boundary between SANG and Land South of Harnham:</b> There is a ‘hard’ straight line at the western edge of the SANG, where this meets the eastern edge of the concept plan in Figure 4.20. In practice, the strategic open space and SANG would form part of an integrated whole, without a perceptible edge. It would be helpful to annotate this intention on the relevant maps.</p>	Wyatt Homes.
<p><b>Circular route:</b> In Paragraph 4.156 there is reference to SANG being needed in order to provide a circular route of at least 2.5km, and the text states such a route “cannot” be devised within the South of Harnham allocation. However, the perimeter of the promoted site as a whole (from Coombe Road to Odstock Road) in fact exceeds 3km, and is proposed by Wyatt to be made available as a perimeter walk. To avoid misinterpretation, the reference to “cannot” should be omitted.</p>	Wyatt Homes.
<p><b>Policy support:</b> Overall we support this package of mitigation measures, which is consistent with the approach adopted by other planning authorities within the New Forest’s 13.8km zone of influence and the recommendations of the most recent research recommendations.</p>	New Forest National Park Authority.
<p><b>Policy support:</b> A key element of the Council’s mitigation strategy is the provision of new greenspace to deflect some recreational visits to the New Forest’s designated sites. This is a well-established form of mitigation. The National Park Authority therefore supports draft Policy 29 which would provide a circular walk of 2.3 - 2.5km to the east of the South of Harnham allocation as additional suitable alternative natural greenspace.</p>	New Forest National Park Authority.
<p><b>Unjustified Policy 27 and 28 allocations:</b> Policy 29 is predicated on an unjustified allocation of land through Policies 27 and 28. HHSG consider that Land south of Harnham (Policy 27) and Land west of Coombe Road (Policy 28) should be allocated as an extended SANG/country park which would help protect the setting of the heritage assets (Scheduled Monument) and the Lime Kiln County Wildlife Site (CWS).</p>	Harnham Housing Steering Group.

Key issues raised (Policy 29 - Suitable Alternative Natural Greenspace, South Salisbury)	Respondent(s)
<p><b>Biodiversity management:</b> It is important that all potential SANG have a management plan and funding that is focused on biodiversity not just amenity purposes. Wiltshire Wildlife Trust recognises that significant effort has been made to create the SANG but would want to see commitments that all SANG are created in addition to any mitigation and in place before the first house is occupied.</p>	Wiltshire Wildlife Trust.
<p><b>Natural England</b></p>	
<p><b>Policy support:</b> Natural England fully supports the proposal for a strategic SANG as set out in Policy 29 and supporting text. The SANG is required to alleviate pressures on the New Forest designated sites from potential increased visitor pressure that would result from residential development allocated under Policies 24, 26, 27 and 28.</p>	Natural England.
<p><b>Country Park:</b> Natural England also supports and welcomes the proposal to establish the SANG as a new Country Park. We would recommend that this aspiration is included in the wording of Policy 29.</p>	Natural England.
<p><b>Opportunities for enhancing biodiversity interests:</b> The SANG / Country Park provides significant opportunities for enhancing biodiversity interests through appropriate tree planting and habitat creation. Natural England recommends that this aspect of SANG delivery is specified in the supporting text and/or Policy.</p>	Natural England.
<p><b>Strengthening supporting text:</b> Paragraph 4.155 of the supporting text should be strengthened to clarify that the SANG should be secured prior to commencement of the schemes allocated under Policies 24, 26, 27 and 28 and be available for public use prior to occupation.</p>	Natural England.
<p><b>Design, layout and size of the SANG</b></p>	
<p><b>Extended area of SANG:</b> Research shows that the larger the SANG the more successful it is in providing an alternative visitor experience that equates to a trip to a site of National Park status such as the New Forest. SAGP consider that the site allocation for the SANG in this area is extended to include that part of Site 8 to the east of the PRow footpath BRIT 18.</p>	Salisbury Area Greenspace Partnership.
<p><b>Considerations for design and layout of the SANG:</b> The following constraints would need to be taken into account in the design &amp; layout for the SANG: i) the Woodbury Ancient Villages Scheduled Monument &amp; its setting not only for its archaeological value but also for the area's wildlife value; ii) the intention to continue the sensitive management of the wildlife rich Lime Kiln Chalk County Wildlife Site, iii requirements for visitor facilities such as car parking, seating &amp; possibly toilet facilities, as well as a 2.5km circular walk, a variety of walks and different areas for people to enjoy.</p>	Salisbury Area Greenspace Partnership.

Key issues raised (Policy 29 - Suitable Alternative Natural Greenspace, South Salisbury)	Respondent(s)
<p><b>Maximising enjoyment of the SANG:</b> In order to maximise people's enjoyment of the area, the design &amp; layout for the SANG will need to take advantage of the topography &amp; site assets including the views &amp; important wildlife value.</p>	Salisbury Area Greenspace Partnership.
<p><b>Funding for SANG</b></p>	
<p><b>Funding via CIL:</b> Securing appropriate contributions via CIL is considered to be an appropriate mechanism however it is noted that the HRA refers to the '<i>majority</i>' of contributions being funded via CIL. This is also referenced within the Viability Assessment where it states that "<i>a proportion of CIL is ring-fenced for these projects..</i>" – which includes the New Forest designated sites.</p>	Persimmon Homes (South Coast) Ltd.
<p><b>Viability:</b> Greater clarity is required regarding the delivery of the SANG and the funding regime to support this. It is noted that Land North of Downton Road is not a site appraised within the Viability Assessment, which makes it difficult to determine how the obligations related to SANG have been assessed in terms of the impact on overall site viability.</p>	Persimmon Homes (South Coast) Ltd.
<p><b>Implications for site viability:</b> In circumstances where the ring-fenced CIL contribution is not adequate to implement the objectives of Policy 29, the implications on the cost burdens for those allocations subject to the SANG requirement, including Policy 26, must be adequately explained.</p>	Persimmon Homes (South Coast) Ltd.
<p><b>Alternative SANG options</b></p>	
<p><b>Alternative SANG options:</b> There is no provision for alternative SANG options to mitigate against any increased recreational pressures arising from this development. As currently drafted the Local Plan does not provide for sufficient flexibility on this matter or recognise that in some circumstances mitigation measures other than the South Salisbury SANG may be appropriate.</p>	Persimmon Homes (South Coast) Ltd.
<p><b>Impacts on New Forest designated sites</b></p>	
<p><b>SANG will not mitigate recreational impacts:</b> The SANG is not going to create the additional greenspace that is claimed and will not mitigate the adverse effects of recreation on New Forest designated sites.</p>	Individuals x10.
<p><b>National Landscape:</b> While the provision of SANG to mitigate effects on the New Forest is noted, there is concern that there is no mitigation or compensation for development affecting the setting of the Cranborne Chase National Landscape.</p>	Cranborne Chase Area of Outstanding Natural Beauty.

Key issues raised (Policy 29 - Suitable Alternative Natural Greenspace, South Salisbury)	Respondent(s)
<p><b>Policy support:</b> Wyatt Homes support the inclusion of this policy as it affirms a proactive stance in relation to addressing impacts relating to the New Forest National Park. Provision has been made to deliver substantial strategic greenspace at the eastern end of the 'Land South of Harnham' site, including the quantum of SANG sought by Wiltshire Council and Natural England.</p>	Wyatt Homes.
<p><b>Policy support:</b> New Forest District Council welcomes the Local Plan making provision to ensure adverse recreational impacts from the South Salisbury housing site allocations are fully mitigated through the provision of the SANG. The Local Plan makes clear how recreational pressures on the New Forest SPA/SAC/Ramsar sites from identified housing site allocations within the 13.8km visitor catchment area will be mitigated.</p>	New Forest District Council.
<p><b>Car parking for SANG</b></p>	
<p><b>Location and operation of car park:</b> Where is the car park proposed to be located? Need to avoid car park being used by visitors to Salisbury District Hospital to avoid parking charges. How will the Council guarantee that the SANG car park remains dedicated to SANG visitors?</p>	Individuals x20
<p><b>Location of car park:</b> It will not be possible to place a large enough car park on or adjacent to the SANG either because of the Woodbury Ancient Monument, Lime Kiln Way CWS or due to lack of access.</p>	Individuals x20
<p><b>Encouraging travel across Salisbury by car:</b> The provision of the SANG with a free car park at an unspecified location will encourage travel across Salisbury by car and will attract many additional visitors to what is a fragile habitat. The designation of a SANG at this location is therefore questionable. The Salisbury Transport Strategy would need to be updated to reflect the additional traffic movements which will be generated by this proposal.</p>	Salisbury City Council; Cycling Opportunities Group Salisbury; Individuals x10.
<p><b>Walking and cycling considerations:</b> Consideration needs to be given to walking and cycling routes to the SANG, and cycle parking should be provided.</p>	Cycling Opportunities Group Salisbury
<p><b>Impacts on Lime Kiln Way Open Space</b></p>	
<p><b>SANG should not incorporate the CWS:</b> Lime Kiln CWS is already an area of protected open space. The Plan by its own admission (SA/SEA) predicts adverse outcomes to the biodiversity of the CWS from the increased numbers of local residents. The SANG should not incorporate the CWS - it should be additional open space. Mitigation from extra use of a CWS cannot be achieved by merely changing its designation.</p>	Individuals x10; Harnham Housing Steering Group
<p><b>Protect CWS from additional footfall:</b> Paragraph 4.157 states that a further objective of the SANG will be to 'manage pressure on Lime Kiln Chalk County Wildlife Site'. The CWS should be protected from any increase in footfall from use of the SANG. No justification has been provided in the LPR on how impacts on Lime Kiln Down have been taken into account or how potential harm to this habitat will be mitigated.</p>	Individuals x20; Salisbury City Council; Salisbury Area Greenspace Partnership.

Key issues raised (Policy 29 - Suitable Alternative Natural Greenspace, South Salisbury)	Respondent(s)
<b>Impacts on Woodbury Ancient Villages Scheduled Monument</b>	
<b>Impacts on Scheduled Monument:</b> Historic England and Wessex Archaeology have advised that no fencing or pathways can be constructed on or near the site, nor gardens or trees be planted, nor should the site be used for sports activities. It is difficult to see then how this area can be used as a SANG. Historic England and the Wessex Archaeology Service advise that continued development around the Scheduled Monument at Woodbury risks harming its setting and is generally to be discouraged.	Individuals x10.
<b>Neighbourhood Planning</b>	
<b>Salisbury City Council:</b> These matters are all discussed in detail in the Salisbury NDP. The proposed SANG is on land part owned by Salisbury City Council. The SANG has not been based on any discussions with Salisbury City Council.	Salisbury City Council.
<b>Habitats Regulations Assessment</b>	
<b>Policy support:</b> The Habitats Regulation Assessment supporting the Local Plan explains that a strategy for mitigating impacts of recreation on New Forest SPA SAC and Ramsar has been established by Wiltshire Council and endorsed by Natural England. New Forest District Council has discussed the proposed updates to the strategy with Wiltshire Council and supports the overall approach being proposed regarding the mitigation of recreational impacts from development within the 13.8km visitor catchment area.	New Forest District Council.



Table 5.42 [Policy 30 - Land East of Church Road, Laverstock] key issues

Key issues raised (Policy 30 - Land East of Church Road, Laverstock)	Respondent(s)
<b>Housing allocation</b>	
<b>Support principle of development:</b> Hallam Land Management (HLM) is supportive of the principle of the proposed housing allocation. However, objection is made to the extent of the allocated site and the detailed requirements of Policy 30.	Hallam Land Management.
<b>Physical features of site:</b> The proposed allocation does not coincide with the physical features of the field within which it is located. The proposed allocation should be defined by the existing strong treed hedgerow which forms the field's eastern boundary. The effect of this amendment would be to increase the potential capacity of the housing allocation to accommodate further dwellings.	Hallam Land Management.
<b>Increase size of site allocation:</b> The capacity of the allocation would be further increased if the field to the north, in the same ownership and controlled by HLM, is included as part of the allocation albeit only for green and blue infrastructure purposes (including for Biodiversity Net Gain).	Hallam Land Management.
<b>Site capacity increase:</b> The amendments proposed to the allocation to the east of Church Road would increase its capacity to "approximately 135 dwellings" rather than the 50 dwellings stated. This increase in capacity would make a material and effective contribution to addressing the under provision of allocated housing sites in the Local Plan within the Salisbury Housing Market Area.	Hallam Land Management.
<b>Site capacity increase:</b> This site is only allocating 50 units when the current planning application (ref: 20/11598/OUT), is proposing 135 houses. There are no defensible reasons to refuse the current application for that site. There is no reason why its allocation should not therefore be increased.	Individuals x10.
<b>Policy support:</b> This site is in Flood Zone 1 and in an area at low risk of ground water flooding. Laverstock has a lot of services/facilities/schools and its designation as a Small Village in the council's settlement hierarchy is inappropriate and needs to be reviewed. Laverstock is also well served by pedestrian/cycle and bus links into Salisbury and is also within walking distance to the Salisbury park and ride. This site is clearly sustainable, available and deliverable.	Individuals x10.
<b>Serving housing needs of Salisbury:</b> The Church Road site is clearly chosen to serve the needs of Salisbury, not the local needs of Laverstock. The removal of Policy 30 would have a negligible, if any, measurable effect on the overall resilience of the city, and is not required for the local needs of Laverstock.	Individuals x10; Laverstock and Ford Parish Council.
<b>Windfall:</b> This number of houses could be found elsewhere through windfall, as historic windfall delivery figures make clear.	Salisbury City Council.

Key issues raised (Policy 30 - Land East of Church Road, Laverstock)	Respondent(s)
<b>Small Village status</b>	
<b>Small Village designation:</b> Laverstock is a Small Village. It was designated a Small Village because it has limited services and facilities. The allocation of 50 homes is too large for a Small Village and is contradictory to Policy 1 which states that infill only is permitted at Small Villages.	Individual x40; Cycling Opportunities Group Salisbury; Laverstock and Ford Parish Council.
<b>Landscape/Biodiversity</b>	
<b>Cockey Down SSSI:</b> The site proposed is immediately adjacent to a sensitive landscape area - Cockey Down SSSI, which supports rare and fragile flora and fauna. This will undoubtedly be threatened by the increased footfall that would inevitably take place.	Individual x30; Laverstock and Ford Parish Council.
<b>Cockey Down SSSI:</b> This housing development will spoil the last uninterrupted views towards Cockey Down SSSI and spoil the semi-rural nature of the area. The proposal would not <i>“maintain the visual character of the landscape when viewed from both inside and outside the Parish”</i> in accordance with the Neighbourhood Plan.	Individual x30; Laverstock and Ford Parish Council.
<b>Transport</b>	
<b>Traffic impacts on Church Road:</b> This allocation will worsen issues of traffic congestion, road safety and poor air quality along Church Road.	Individual x40; Laverstock and Ford Parish Council.
<b>Poor bus services:</b> The bus service into Salisbury is inadequate; Laverstock needs a frequent, reliable bus service to and from the city centre.	Individual x10; Laverstock and Ford Parish Council.
<b>Salisbury Transport Strategy:</b> The Salisbury Transport Strategy needs to be updated to reflect the additional traffic movements which will be generated by this site. The policy will need to be removed unless it can be demonstrated that the cumulative impact on the road network will not be severe. If deemed acceptable, with appropriate mitigation to encourage modal shift, the policy should be expanded to refer to the Salisbury Transport Strategy.	Cycling Opportunities Group Salisbury.
<b>Neighbourhood Planning</b>	
<b>Laverstock &amp; Ford Neighbourhood Plan:</b> Consider that development on the land east of Church Road, Laverstock would not be in accordance with the Laverstock & Ford Neighbourhood Plan.	Individuals x10; Laverstock and Ford Parish Council; Salisbury Area Greenspace Partnership; Salisbury City Council.
<b>Natural England</b>	

Key issues raised (Policy 30 - Land East of Church Road, Laverstock)	Respondent(s)
<b>SANG:</b> Supports the Policy requirement for a SANG to mitigate for increased recreational pressures on the New Forest designated sites. However, the allocation site is too small for the necessary SANG provision to be provided within the allocation. Clarification is needed on the location and scale of the SANG for the allocation.	Natural England.
<b>Impacts on Cockey Down SSSI:</b> The allocation is in close proximity to the Cockey Down SSSI. Recreational assessments already completed have demonstrated that an increase in recreational activity on the reserve is likely. The supporting text and Policy wording should recognise that increased recreational activity is likely to result from the allocation and that any resulting increase in reserve management costs, including increased requirements for warden visits, are appropriately compensated.	Natural England.
<b>Brownfield site availability</b>	
<b>Alternative brownfield sites:</b> Alternative brownfield sites in Salisbury have not been considered before allocating greenfield sites.	Cycling Opportunities Group Salisbury; Laverstock and Ford Parish Council; Individuals x10.
<b>Provision of SANG</b>	
<b>Provision of SANG:</b> If the capacity of the allocation is not increased as advocated by Hallam Land Management (HLM) then bullet point 7 of this policy needs to be amended because there is a lack of precision and also scope for confusion which means the policy is not effective. If less than 50 dwellings were to be erected on the proposed allocation then the guidelines in the interim Recreation Mitigation Strategy for the New Forest Internationally Protected Sites would apply, namely a financial contribution being paid rather than the " <i>provision of Suitable Alternative Natural Greenspace</i> ".	Hallam Land Management.
<b>New Community</b>	
<b>New Community near Porton Down:</b> If Wiltshire Council needs to build more housing, a more sensible option would be for a new village near Porton Down, with its own schools and proper transport links into Salisbury. This would be a better plan than squeezing in additional housing in areas without adequate infrastructure, putting strain on local services and adding to traffic congestion.	Individuals x10.
<b>Sustainability Appraisal (SA)</b>	
<b>Likely significant effects:</b> The issues highlighted in the SA and number of 'moderate adverse' effects noted make this one of the least sustainable sites and it should not therefore be allocated for housing development.	Individuals x10; Laverstock and Ford Parish Council.
<b>Flood risk</b>	

Key issues raised (Policy 30 - Land East of Church Road, Laverstock)	Respondent(s)
<b>Flood Risk:</b> In times of heavy rain the road fronting the proposed development floods so building on fields would exacerbate the problem.	Individuals x10.
<b>Route of oil pipeline</b>	
<b>Oil pipeline:</b> An important oil pipeline comes down over the Downs just below the ground and needs protecting from any proposed building.	Individuals x10.
<b>Sewerage system</b>	
<b>Impacts on sewerage system:</b> The sewerage system is already inadequate and any further development would make this worse.	Individuals x10.

Table 5.43 [Policy 31 - Salisbury Central Area] key issues

Key issues raised (Policy 31 - Salisbury Central Area)	Respondent(s)
<b>Central Area definition</b>	
<b>Central Area lacks definition:</b> No clear definition is provided as to what constitutes the 'Central Area' (no boundary). References to the central area are resultantly unclear. Clarify with additional wording/amendment to Fig. 4.23/Policies Map?	Railway Pension Nominees Ltd.
<b>Churchfields</b>	
<b>Churchfields housing provision:</b> Churchfields should be a mixed use area capable of providing housing.	Salisbury City Council.
<b>The Maltings</b>	
<b>No strategy for The Maltings:</b> There is no masterplan for The Maltings and no indication of what this should deliver.	Salisbury City Council.
<b>Salt Lane Car Park and Brown Street Car Park</b>	
<b>No parking study:</b> Consideration of these sites for alternative uses should be informed by a study of parking requirements of the city.	Cycling Opportunities Group Salisbury.
<b>Loss of Salisbury District LP Policies:</b> Thrust of Policies H5, H6, E5, S5, should be included in Policy 31.	Cycling Opportunities Group Salisbury.
<b>People Friendly Streets (PFS)</b>	
<b>PFS reference:</b> CAF considered to be unsound due to removal of PFS a few weeks after implementation. Policy needs to contain reference to the CAF recommendations including how PFS are to be taken forward.	Individual x10; Cycling Opportunities Group Salisbury.
<b>Natural England</b>	
<b>River Avon SAC Protection:</b> Salisbury Central Area includes parts of the River Avon SAC. Policies should therefore require protection and enhancement of the ecology of the river corridor and development should avoid additional light spill into the SAC.	Natural England.
<b>Salisbury as a shopping destination</b>	
<b>Retail:</b> Policy fails to recognise Salisbury as a shopping destination.	Railway Pension Nominees Ltd.

**Table 5.44 [Policy 32 - Salisbury Skyline] key issues**

Key issues raised (Policy 32 - Salisbury Skyline)	Respondent(s)
<b>Lack of evidence:</b> There doesn't seem to be evidence for why this policy has been altered over the Core Strategy policy.	Salisbury Civic Society.
<b>Policy conflict:</b> Policy 26 conflicts with Policy 32.	Individuals x10.
<b>Retain WCS Policy 22:</b> Policy 22 in the Wiltshire Core Strategy should not be deleted without a replacement.	Individuals x10.

Table 5.45 [Policy 33 - The Maltings and Central Car Park] key issues

Key issues raised (Policy 33 - The Maltings and Central Car Park)	Respondent(s)
<b>Housing / Retail / Mixed uses</b>	
<b>Unclear as to why site is not allocated:</b> The Maltings/Central Car Park should be allocated over other, less sustainable sites in Salisbury/Harnham. Unclear as to why the number of dwellings planned for the Maltings/Central Car Park is not included within the policy or as a housing allocation for Salisbury. Lack of allocation has meant that the site was not included through the SA/site selection process, and it is thus unclear how it performs against other sites.	Salisbury City Council; Salisbury Neighbourhood Plan Steering Group; Harnham Housing Steering Group; Individual x160.
<b>Lack of justification for policy:</b> Not positively prepared. Retail led policy does not reflect current market circumstances. Has the policy considered the Retail and Town Centres study 2020 for instance? A revised masterplan should support this policy setting an updated quantity of housing/commercial and delivery timetables.	Salisbury City Council; COGS; Individuals x10.
<b>Flooding</b>	
<b>Flood Risk:</b> Policy should reference the Level 2 SFRA for Salisbury, and this document must be available to support the Local Plan. The LPA should also ensure that this SFRA Level 2 reflects the latest modelling associated with the Salisbury River Park flood alleviation scheme.	Environment Agency.
<b>Transport/accessibility</b>	
<b>WCS pedestrian link aspirations:</b> Unclear why policy does not echo WCS aspirations with respect to links to Fisherton Street, Market Walk and surrounding city centre.	Cycling Opportunities Group Salisbury (COGS).
<b>Salisbury CAF &amp; River Park Masterplan consistency:</b> Policy should reflect CAF aspirations and River Park Masterplan in respect of improving pedestrian and cycle infrastructure.	Cycling Opportunities Group Salisbury (COGS); Individual x10.

Table 5.46 [Policy 34 - Churchfields Employment Area] key issues

Key issues raised (Policy 34 - Churchfields Employment Area)	Respondent(s)
<b>Housing/mixed uses</b>	
<b>Site should be allocated:</b> The Local Plan should allocate Churchfields for housing development/200 homes, reducing employment uses and removing the need for allocations on greenfield housing sites elsewhere. Suggested that Council should utilise its land assembly powers to achieve this.	Salisbury City Council; Harnham Housing Steering Group; Individuals x140.
<b>Contamination:</b> Insufficient evidence provided on constraints such that it is unclear as to why these cannot be addressed over the plan period to allow for housing allocation. An EIA should be provided together with a mitigation strategy.	Harnham Housing Steering Group; Individuals x10.
<b>Employment</b>	
<b>Employment uses:</b> The site should move away from light industrial uses to uses which would better compliment residential development in a mixed use scheme.	Individuals x10.
<b>Environment</b>	
<b>Public Realm:</b> Policy fails to take advantage of riverside frontage in redeveloping the site.	Individuals x10.
<b>Transport</b>	
<b>Traffic:</b> Development of this site will detrimentally impact wider Salisbury through increased commercial traffic and commuting (housing not sufficiently closeby). The policy fails to provide certainty on this matter and it is argued that this type of development should be located close to the strategic transport network (in accordance with Policy 74). Additionally, unclear as to why household waste and recycling facility cannot be moved to a more accessible location to reduce traffic.	Salisbury City Council; Harnham Housing Steering Group; Individual x10.
<b>Accessibility study:</b> Regeneration plan should be supported by accessibility study.	Salisbury City Council.



**Table 5.47 [Policy 35 - Salisbury District Hospital Campus] key issues**

Key issues raised (Policy 35 - Salisbury District Hospital Campus)	Respondent(s)
<b>Support:</b> Site owner/promoter supports the policy but provides suggested wording to add detail to criteria within Policy 35.	Lichfields on behalf of Salisbury NHS Foundation Trust and Salutem Developments.
<b>High quality and affordable accommodation:</b> The ability to attract and retain staff and students to Salisbury will continue to depend, to a significant degree, on the Trust's ability to find high quality and affordable accommodation. The availability and affordability of housing in the local area represents a major barrier in this regard and a threat to the ability of the Trust to deliver its strategic priorities. As set out in Section 4 of the Salisbury HEAT Project: Vision and Masterplan 2023 update, there is a very strong rationale for the provision of complementary accommodation as part of the Policy 35 allocation and HEAT project.	Lichfields on behalf of Salisbury NHS Foundation Trust and Salutem Developments; NHS Bath and North East Somerset; Swindon & Wiltshire Integrated Care Board.
<b>High quality and affordable accommodation:</b> Although there are c.360 existing units of key worker accommodation at Salisbury hospital, these are insufficient to meet identified needs amongst current staff and will not be available to the new student population or newly recruited key workers. Furthermore, they no longer provide the quality of accommodation that would be reasonably expected. As such, the masterplan provides for their redevelopment/ renovation and replacement.	Lichfields on behalf of Salisbury NHS Foundation Trust and Salutem Developments; NHS Bath and North East Somerset; Swindon & Wiltshire Integrated Care Board.
<b>High quality and affordable accommodation:</b> Amendment to draft Policy 35 sought by promoters SFT/Salutem to include reference to the provision of accommodation for key workers and students. This would be complementary to the range of uses that are anticipated by the draft policy and would be critical to ensuring the long-term success of the project.	Lichfields on behalf of Salisbury NHS Foundation Trust and Salutem Developments; NHS Bath and North East Somerset; Swindon & Wiltshire Integrated Care Board.
<b>Policy support:</b> Wyatt Homes support the broad principle of looking to develop and enhance the Salisbury District Hospital campus. The principle of developing associated activities and industries in relation to healthcare, education and science are welcomed. These would be complementary to the additional housing, recreational space, SANG and other facilities proposed by Wyatt nearby.	Wyatt Homes.
<b>Policy support:</b> Support such that Salisbury District Hospital performs its role as a healthcare provider of local and regional importance. The integration of healthcare with education, training, and technology facilities will not only bring a range of economic and community benefits but also position Salisbury as a hub for life science, university-level education, and knowledge facility.	NHS Bath and North East Somerset; Swindon & Wiltshire Integrated Care Board.
<b>Landscape</b>	

Key issues raised (Policy 35 - Salisbury District Hospital Campus)	Respondent(s)
<p><b>Landscape:</b> The location is very close to the National Landscape on land sloped towards it. Concern that development could have significant adverse impacts on the National Landscape, and the wording of Policy 35 appears to prejudge that ‘Development will not have an unacceptable visual impact upon the character and appearance of the surrounding area’.</p>	Cranborne Chase Area of Outstanding Natural Beauty.
<p><b>Access:</b> Request that access to and from the campus be taken from the north to avoid additional traffic on narrow roads in the National Landscape at Nunton, Odstock, and Homington.</p>	Cranborne Chase Area of Outstanding Natural Beauty.
<p><b>National Highways</b></p>	
<p><b>Traffic generation:</b> Supporting paragraph 4.178 states that <i>“To avoid impacts on the local and strategic highway network, the NHS Trust intends that development will not increase traffic movements or car parking provision above current levels, by implementing a comprehensive car parking policy and travel plan”</i>. To avoid future uncertainty, National Highways would recommend that restrictions on future development associated with traffic generation and car parking are clearly set out in Policy 35 rather than in supporting text, and that the restriction on traffic generation should be defined in terms of the traditional morning and evening commuter periods when the network is under greatest constraint.</p>	National Highways.

**Table 5.48 (Policy 36 - Amesbury Market Town) Key issues raised**

Key issues raised (Policy 36 - Amesbury Market Town)	Respondent(s)
<b>Policy support</b>	
<b>High Post:</b> Supportive of approach for no further development at High Post.	Durnford/Woodford/Lake Rising Joint Parish Councils.
<b>Amesbury:</b> Independent studies (ecological, archaeological, landscape, transport, planning and housing needs and supply analysis) agreed with Wiltshire Council's own evidence, namely that proposed sites should not be allocated for development.	Durnford/Woodford/Lake Rising Joint Parish Councils; Amesbury Town Council.
<b>Future Development</b>	
<b>Lack of Allocations/Constraints:</b> Concern raised regarding the wording of the supporting text stating that Amesbury is spatially constrained and the conclusions of the SA, with particular concern to the SA and site selection process for Site 4. Suggestions are made that the resultant scale of future growth for Amesbury is insufficient, with reference given to shortfalls in supply within the HMA. Multiple challenges to the Council's position, with suggestions that Amesbury can support significant growth due to being a sustainable settlement and that this would accord with the overall settlement strategy (Policies 1 & 2). It is suggested that the constraints identified by the Council to prevent development are not sufficiently evidenced (specific concern raised over the omission of the Stonehenge WHS study and lack of evidence of archaeological constraints in the locality) and that until such a time that this evidence is presented, the policy is unsound/not positively prepared. Suggestions are made that there are opportunities for development/allocations which would not lead to significant landscape impact.	Classmaxi; Woodhouse Development; Go South Coast; Waddeton Park; Lincoln College; Woodhouse Development; Individuals x10.
<b>Quantity of Development:</b> Suggested that targets for 530 dwellings over the plan period are insufficient, noting that this results in a residual figure of 120 dwellings (accounting for completions and commitments). Additional development should be delivered around public transport corridors between Salisbury and Amesbury (Site 4) or south of Stockport Avenue.	Lincoln College; Woodhouse Development; Go South Coast; Waddeton Park.
<b>New Community:</b> Noted that there are no allocations to support the Council's suggestion for a new community, which is considered to make the plan unsound, with some suggestions that Policy 21 should be deleted and replaced with sufficient allocations. Suggested that a new community should be delivered north of Salisbury, along the A345, or south along the A338.	Classmaxi; Woodhouse Development; Go South Coast; Waddeton Park; Lincoln College; Individual x10.
<b>Plan Period:</b> Plan should be extended to at least 2040 or 2041.	Lincoln College; Woodhouse Development; Go South Coast.

Key issues raised (Policy 36 - Amesbury Market Town)	Respondent(s)
<p><b>Employment:</b> Concern raised that additional employment land may be required at Amesbury, current approach is suggested as not being in line with ELR. High Post PEA should be extended to incorporate previous adjoining permissions and the salt depot. Solstice Park should be favoured for extension over Boscombe Down Airfield (which is suggested as being more constrained particularly in landscape terms and with limited appetite for further employment growth) and Porton Down (which is suggested as being in an unsustainable location with specialist employment opportunities as opposed to more widely accessible general employment opportunities at Solstice Park).</p>	<p>Durnford / Woodford / Lake Rising Joint Parish Councils; Go South Coast Ltd; Classmaxi; Woodhouse Developments; Sustainable Amesbury; Nash Felts Limited; Individuals x10.</p>
<p><b>Transport</b></p>	
<p><b>Congestion:</b> Increases to employment provision at both Boscombe Down and Porton Down will lead to increased traffic congestion in Amesbury town centre.</p>	<p>Individuals x10.</p>
<p><b>Infrastructure</b></p>	
<p><b>Infrastructure Capacity:</b> Amesbury has insufficient sixth form/college and healthcare capacity together with insufficient leisure facilities. Improvements to Amesbury’s infrastructure are not covered within the IDP.</p>	<p>Amesbury Town Council.</p>
<p><b>Utilities:</b> Concern over water shortage and suggestions made for new reservoir.</p>	<p>Individuals x10.</p>
<p><b>Policy Wording</b></p>	
<p><b>Heritage:</b> Suggested to include “protect and conserve the World Heritage Site and its setting” within the policy wording.</p>	<p>National Trust.</p>

Table 5.49 Key issues raised (Policy 37 - Boscombe Down)

Key issues raised (Policy 37 - Boscombe Down)	Respondent(s)
<b>Policy Support</b>	
<b>Policy Wording:</b> Supportive of principle and policy wording, however, suggested that MOD should have been engaged with earlier in the process (Duty to Cooperate).	Ministry of Defence.
<b>Employment</b>	
<b>Quantity:</b> Noted that the policy makes no reference to the amount of employment land/floorspace to be delivered.	Rushall Parish Council; Amesbury Town Council; Classmaxi.
<b>Lack of Demand:</b> Previous plans have been unsuccessful at delivering development in this location. Suggested there is no demand for employment at this site and the policy is therefore ineffective.	Rushall Parish Council; Amesbury Town Council; Classmaxi.
<b>Transport</b>	
<b>Congestion:</b> Business expansion at this site is likely to increase freight traffic on A345 and A303. Noted that A345 is non-strategic and increased freight movement contravenes its designated status. Suggested that a Freight Management Strategy should be in place. Concern has been raised that additional employment land will lead to further 'in-commuting' and congestion.	Rushall Parish Council; Amesbury Town Council; Classmaxi.

Table 5.50 [Policy 38 - Porton Down] key issues

Key issues raised (Policy 38 - Porton Down)	Respondent(s)
<b>Policy Support</b>	
<b>Employment Provision:</b> Policy is supported in principle, with its international importance noted.	Metis Homes.
<b>Employment</b>	
<b>Quantity:</b> Policy is silent on the quantity of employment to be delivered, resulting in the policy being unclear and ineffective.	Amesbury Town Council.
<b>Specialised Jobs:</b> Concern is raised that due to the nature of the employment site it will not create job opportunities for the local people.	Amesbury Town Council.
<b>Site Specific Constraints</b>	
<b>Ecology:</b> Suggested to include requirements of supporting para 4.191 within policy wording (protect SPA and SAC).	Natural England.
<b>Transport</b>	
<b>Limited Sustainable Travel Options:</b> The site is noted as being isolated and as such there is limited opportunity to commute to it by sustainable means, which is suggested as going against the Council's plan to address climate change. More sustainable alternative employment locations exist, for example Solstice Park.	Metis Homes; Martin Miller; Classmaxi.
<b>Congestion:</b> Expansion of employment site is likely to increase volume of freight traffic onto the A345 and A303. The A345 is non-strategic and therefore increased freight movement contravenes the designated status of the A345. LTP4 should inform the Local Plan together with a Freight Management Strategy.	Colin Gale; Rushall Parish Council.

Table 5.51 [Policy 39 - Tidworth and Ludgershall Market Town] key issues

Key issues raised (Policy 39 - Tidworth and Ludgershall Market Town)	Respondent(s)
<b>General policy support</b>	
<b>Support:</b> The policy is generally supported/considered sound.	Network Rail.
<b>Housing and scale of growth</b>	
<b>Unconstrained settlement:</b> It should be clarified (including at para 4.193) that Ludgershall is the only Main Settlement in the Salisbury HMA not a 'Constrained Settlement', therefore optimising growth in this location is fundamental to the delivery strategy given the reduced levels of supply at the HMA, compared to needs identified by ONS.	Ludgershall Homes.
<b>Housing requirement as 'a minimum':</b> Reference to 'approximately 2,080 homes...' should be reframed as a 'minimum' figure to align with NPPF para 60 and to confirm that housing requirements for the Market Towns are not a ceiling on growth.	Ludgershall Homes.
<b>Role of the settlement:</b> Criterion 1 of the policy should be modified to clarify the strategic role that Ludgershall serves in delivering growth, rather than its function serving the serving a military population. [Policy wording amendment proposed by the representor]	Ludgershall Homes.
<b>Cross boundary matters with Test Valley Borough Council / Hampshire County Council</b>	
<b>Cross boundary engagement:</b> Test Valley Borough Council wish to continue engagement relating to potential future development at Ludgershall, regarding water supply, wastewater treatment, energy supply, highway access, sustainable and active travel modes and rights of way, potential use of railway line as sustainable travel route, education, primary healthcare/GP provision, local centres/community facilities, green infrastructure and open space, environmental mitigation, landscape sensitivity, including relationship with North Wessex Downs AONB.	Test Valley Borough Council.
<b>Habitat Regulations:</b> Test Valley Borough Council wish to continue engagement meeting obligations under the Habitats Regulations relating to Salisbury Plain SPA (recreational disturbance/stone curlew); and Avon SAC and Solent Region SPA, SAC and Ramsar (nutrient neutrality - phosphates and nitrates).	Test Valley Borough Council.
<b>Cross boundary highways infrastructure:</b> Para 4.198 refers to the need for collaboration with Hampshire County Council (HCC) for the delivery of highways access to serve Land south east of Empress Way. Reference should also be made to TVBC as local planning authority who would be required to grant planning permission for the access.	Test Valley Borough Council.

Key issues raised (Policy 39 - Tidworth and Ludgershall Market Town)	Respondent(s)
<b>Test Valley Local Plan:</b> Para 4.198 should be clarified that any future need to further expand the town into Test Valley will be a matter for determination by the Test Valley local plan process.	Test Valley Borough Council.
<b>Ecology</b>	
<b>Designated sites:</b> Recommended that a new criterion be added to acknowledge that development at Ludgershall will need to maintain the integrity of the designated sites within the Solent Special Protection Area, having regard to the effect of nutrients on the designated sites arising from increased wastewater production in accordance with Natural England guidance.	Ludgershall Homes.
<b>Healthcare</b>	
<b>Provision towards healthcare:</b> A new criterion is required to set out the need for development to deliver funding contributions towards healthcare.	Bath and North East Somerset; Swindon and Wiltshire NHS Integrated Care Board.
<b>Sustainable Transport</b>	
<b>Sustainable transport link:</b> Regarding exploration of future opportunities to utilise the railway line as a sustainable travel route, Network Rail notes that previous attempts to progress this aspiration have failed. Network Rail would be open to future discussions but currently have no plans for the line.	Network Rail.
<b>MoD operated railhead and track:</b> To be noted that the MoD own the railhead and tracks referred to in criterion 6, which are used for rail freight. The MoD is a stakeholder and request to be included in any future discussions regarding potential future opportunities to utilise of the rail line as a sustainable transport route.	MoD.
<b>Local cycle network:</b> Commitment should be made with Hampshire County Council to deliver a shared cycle routes between Ludgershall and Andover, linking through Weyhill.	Individuals x10.
<b>Town centre</b>	
<b>Ludgershall town centre:</b> Ludgershall's retail core in the town centre is not visually attractive and should be improved / the town centre requires more landscaping and planting to improve its appearance.	Individuals x10.



Table 5.52 [Policy 40 - Land south east of Empress Way, Ludgershall] key issues

Key issues raised (Policy 40 - Land south east of Empress Way, Ludgershall)	Respondent(s)
<b>Scale of growth</b>	
<b>Scale of growth:</b> Concern with the allocation the HMA's largest allocation in Ludgershall because: it is a relatively small market town, only classified as such due to its linkages with Tidworth; it has limited services, beyond the MOD has a limited range of employment options; and Ludgershall has limited attractiveness to civilian employers as evidenced by the failure of delivery at the Castledown employment site.	Go South Coast Ltd.
<b>Settlement constraints:</b> The Local Plan incorrectly refers to Ludgershall as unconstrained. The settlement is constrained by land ownership, MOD uses and the county boundary.	Go South Coast Ltd.
<b>Duty to Cooperate / Engagement</b>	
<b>Cross boundary highways infrastructure:</b> Para 4.198 refers to the need for collaboration with Hampshire County Council (HCC) for the delivery of highways access to serve Land south east of Empress Way. Reference should also be made to TVBC as local planning authority who would be required to grant planning permission for the access.	Test Valley Borough Council.
<b>Test Valley Local Plan:</b> Para 4.198 should clarify that any future need to further expand the town into Test Valley will be a matter for determination by the Test Valley local plan process.	Test Valley Borough Council.
<b>Need for a masterplan</b>	
<b>Masterplan process:</b> Object to requirement for the approval of masterplan prior to planning application process. There is a lack of clarity about the process of this requirement.	Ludgershall Homes.
<b>Concept plan:</b> Paragraph 2 of the policy contradicts paragraph 4.200 with regard to the extent to which development proposals must take account of principles on concept plan. The concept plans should be treated as illustrative, as per para 4.200. [Policy wording amendment proposed by the representor]	Ludgershall Homes.
<b>Highways</b>	
<b>Strategic Road Network:</b> Further information required to evidence the performance of individual Strategic Road Network junctions; Bullet point 3 should be amended to include specific reference to SRN impacts and mitigation needs. The policy wording "a transport assessment that will determine the trigger point for the delivery of the access via Andover Road within Hampshire" should be extended to refer to: "a transport assessment that will determine the trigger point for the delivery of the access via Andover Road within Hampshire, and determine the need for any improvements to key access junctions on the A303 trunk road".	National Highways.

Key issues raised (Policy 40 - Land south east of Empress Way, Ludgershall)	Respondent(s)
<p><b>Local road network:</b> It must be demonstrated that the strategic flow of traffic on the A342 is not compromised by the development; must have regard to Policy DM2 (i) of Hampshire’s LTP4 – HCC will “only support requests for NEW accesses onto A roads, the principal road network or traffic sensitive streets where the strategic flow of traffic is prioritised and not compromised and when all other reasonable options (such as taking access from nearby side roads) has been considered.”</p>	Hampshire County Council.
<p><b>Trigger point for the delivery of road infrastructure:</b> The timing for the trigger point for the delivery of the southern link road is unclear, as is the consequent implication for proposed phasing of delivery of the allocation, including the element reliant upon the link road.</p>	Test Valley Borough Council.
<p><b>Transport Assessment:</b> Bullet point 3 should reference the A342 for clarity; and it should be clarified that a Transport Assessment will determine all points of connection, not just to the A342. [Policy wording amendment proposed by the representor]</p>	Ludgershall Homes.
<p><b>Bus network:</b> The proposed allocation would extend an already long access route by over a kilometre, not a logical public transport corridor. Long term provision of frequent bus service is impossible to envisage, except for residents on the far northern edge that could access the existing Activ8 bus service. The scale of the allocation is in no way sufficient to justify costs for a new service. A smaller allocation of up to 450 or 500 dwellings directly south of the railway (no further than 700-800m south of Andover Road – i.e. existing bus stops) and delivering an extension of Empress Way within Hampshire, may be supportable if residents utilise existing service from Andover Road.</p>	Go South Coast Ltd.
<p><b>Uncertainty of cross boundary road infrastructure:</b> Concern that the costs and feasibility of the link road into Hampshire have not been tested; Concern that the allocation is reliant on cross boundary infrastructure which the Local Plan cannot secure, as it relies on delivery in an adjoining authority area.</p>	Go South Coast Ltd.
<p><b>Funding for road infrastructure and railway crossing:</b> The policy and supporting text fails to note that to connect the site to the A342 a new crossing of the Andover to Ludgershall MoD freight branch railway line would be required. Policy 40 should therefore include the requirement for the development to fund/provide the railway crossing; The development link road, new junction on the A324 and rail crossing must be funded by the developer – these infrastructure requirements should appear in the Infrastructure Delivery Plan that supports the Local Plan.</p>	Hampshire County Council.
<p><b>Connection to Moyne Drive:</b> Bullet point 1 should remove reference to Moyne Drive. No direct connection to Moyne Drive is required to deliver Policy 40. This connection is related to the adjoining WHSAP policy H1.1 allocation. [Policy wording amendment proposed by the representor]</p>	Ludgershall Homes.

Key issues raised (Policy 40 - Land south east of Empress Way, Ludgershall)	Respondent(s)
<b>Concept plan highways connections:</b> The concept plan should be amend the ‘Indicative location of potential future connection’ to make effective use of land within the likely odour constraints, and facilitating connectivity to southern parts and a future corridor south-westwards towards Somme Road.	Ludgershall Homes.
<b>Rural character of Shoddesdon Lane:</b> Shoddesdon Lane has a rural character, which should be preserved through the development of the site.	Individuals x10.
<b>Pedestrian/cycle access</b>	
<b>Pedestrian access over level crossing:</b> The policy does not account for level crossing over the railway - potential increase in usage of these crossings presents a safety concern, especially if increased use of the Ludgershall branch line is encouraged. Whilst the school site sits outside the policy area boundary, its location would act as an attractor for increased use of the crossings along this section of the railway line.	Network Rail.
<b>Pedestrian connectivity:</b> The presence of the railway severs connectivity between the site and the town centre with only a single pedestrian level crossing, which is narrow and unlit, and involves substantial changes in levels – unsuitable for those with poor mobility; access via Shoddesden Lane impractical, a low and single-track under-bridge exists about 850m further east not capable of being widened/improved.	Go South Coast Ltd.
<b>Contributions towards cycle connectivity:</b> Hampshire County Council will seek a contribution towards a high-quality cycling route to connect the development with Andover, as a key destination for trips originating from this site; to align with policy DM1d of the Hampshire Local Transport Plan 4 (LTP4).	Hampshire County Council.
<b>Active travel:</b> The concept plan shows limited access via active modes from the east of the site. The site should be shown to be more permeable for active travel options prioritising walking and cycling. Currently it does not accord with policies of Hampshire’s LTP4 which aims to provide a transport system that reduces dependency on the private car and promotes high quality, prosperous places and puts people first.	Hampshire County Council.
<b>Ecology</b>	
<b>Skylark and lapwing:</b> Support the provision within Policy 40 for an ecological assessment of lapwing and skylark populations and habitat.	Natural England.
<b>Habitat conservation within the site:</b> The policy should also require as far as possible the maintenance of populations within areas of green infrastructure retained onsite and where necessary unavoidable losses should be compensated through the provision of agreed long term offsite conservation measures. Natural England supports the inclusion of 26 hectares of green infrastructure within the concept plan but recommends this is set out in the policy as a minimum area requirement for the scheme.	Natural England.

Key issues raised (Policy 40 - Land south east of Empress Way, Ludgershall)	Respondent(s)
<p><b>Offsite habitat mitigation area associated with adjoining site:</b> Land to the southeast of SHELAA site 555 should not be excluded from the allocation area, as it is no longer required to provide offsite mitigation for lapwing and skylark populations associated with the adjoining site at Empress Way. This land should be shown on the concept plan as accessible natural green space /BNG space. Bullet point 6 should be amended - no compensation is legally required to mitigate for lapwing and skylark habitat associated with this or the WHSAP allocation site; the area of Deciduous Woodland Priority Habitat should be referenced in the policy.</p>	Ludgershall Homes
<p><b>Nitrogen neutrality:</b> The supporting text/bullet point 7 should identify that the allocation is within the hydrological catchment of the Solent Internationally designated sites and will therefore require measures to ensure Nitrogen Neutrality.</p>	Natural England; Ludgershall Homes
<p><b>Onsite habitats:</b> The site contains habitat for barn owls that should be protected; There are notable plant species present on the banks along Shoddesdon lane, which should be protected.</p>	Individuals x10
<p><b>Landscape/open space</b></p>	
<p><b>Landscape mitigation:</b> Bullet point 4 and paragraph 4.197 do not accord with the Wiltshire Site Landscape Appraisal of site LU5, where the conclusions on mitigation that do not state ‘screening’ is the answer. Transition of urban development to the wider Downs landscape is recommended to be achieved through strategic green spaces, grassland and woodland.</p>	Ludgershall Homes.
<p><b>Allotments:</b> The concept plan should reduce Allotments from 0.9 hectares to 0.7 hectares to reflect Wiltshire Open Space Assessment Update (2020) – Final Report March 2023 requirements for 2.5sqm per person, equating to 0.73 hectares for a 1,220 dwelling scheme.</p>	Ludgershall Homes.
<p><b>Infrastructure/utilities</b></p>	
<p><b>Utilities infrastructure:</b> Bullet point 8 should be amended as there is no evidence to justify the use of the word ‘significant’; reference should be made to the phasing of development aligned to delivery of any necessary infrastructure. [Policy wording amendment proposed by the representor]</p>	Ludgershall Homes.
<p><b>Wastewater treatment works:</b> Bullet point 9 requirements amend to reflect that it is a wastewater treatment works, not a water recycling centre; and that appropriate mitigation is to be discussed and agreed with Southern Water, with revised wording proposed as follows: Appropriate mitigation of potential impacts from the Wastewater Treatment Works Water Recycling Centre, such as a suitable buffer informed by an odour assessment, to be carried out in consultation with Southern Water.</p>	Southern Water.

Key issues raised (Policy 40 - Land south east of Empress Way, Ludgershall)	Respondent(s)
<p><b>Odour exclusion zone:</b> The Concept Plan should not define the 1.5 OUE isopleth (odour) as a constraint. The concept plan should just show the physical location of the Waste Water Treatment Works as a constraint with no specific 'odour boundary' shown; Bullet point 9 reference to a "suitable buffer" to source of odour should be amended, recognising the findings of the site promoters odour assessment, including that physical buffers are not always required as certain land uses may be appropriate in closer proximity to the odour source – e.g. local centre, employment and allotments.</p>	Ludgershall Homes.
<b>Education</b>	
<p><b>Early years:</b> Paragraph 1 of the policy is unclear with regard to the evidence to require two 0.3ha sites for two 80 place nurseries.</p>	Ludgershall Homes.
<p><b>Location of primary school:</b> There should be flexibility to accommodate an alternative arrangement associated with the adjacent WHSAP site, with potential to relocate the proposed school site to improve the masterplanning approach for the area.</p>	Ludgershall Homes.
<p><b>Education/healthcare:</b> Bullet point 5 should be amended to provide flexibility, as the need for financial contributions are to be assessed at the time of the planning application.</p>	Ludgershall Homes.
<b>Local centre/employment</b>	
<p><b>Local centre:</b> The location of the Local Centre on the Figure 4.28 Concept Plan does not accord with the principles in 4.199. The Local Centre should be repositioned to be accessible by dwellings that are further from the town centre / better related to proposed highway infrastructure; Clarification should be provided within para 4.199 on the size (including range) of the Local Centre to be provided on the site as well as potential suitable uses for the Local Centre.</p>	Ludgershall Homes.
<b>Amenity</b>	
<p><b>Ground conditions:</b> Bullet Point 10 should be deleted. All of the site is arable farmland and with no past land use that may result in adverse ground conditions.</p>	Ludgershall Homes.
<p><b>Adjoining MOD uses:</b> Bullet Point 11 should be deleted. There are no live firing areas at Perham Down. Neighbouring MoD uses are a sports (polo) ground and no MoD uses in the vicinity that could be considered inconsistent with residential uses at the site.</p>	Ludgershall Homes.
<b>Viability</b>	
<p><b>Affordable housing threshold:</b> Concern about viability implications for the scheme as a result of the blanket 40% affordable housing threshold set by Policy 76.</p>	Ludgershall Homes.

Key issues raised (Policy 40 - Land south east of Empress Way, Ludgershall)	Respondent(s)
<b>Viability/abnormal costs:</b> Concern about assumptions that infrastructure and mitigation requirements (extension to Empress Way to Andover Road and water supply / foul drainage) would not be addressed through the viability headroom – should be considered as a separate infrastructure costs.	Ludgershall Homes.

**Table 5.53 [Policy 41 - Land at Bulbridge, Wilton] key issues**

Key issues raised (Policy 41 - Land at Bulbridge, Wilton)	Respondent(s)
<b>Support:</b> Site allocation supported.	Wilton Estate.
<b>Traffic speed:</b> Any development of the site should be accompanied by a reduction in the speed limit on South Street from the southern entrance of Bulbridge Road heading into Wilton. It is dangerous for vehicles pulling out from Chantry Road/Bulbridge Road south entrance, and for pedestrians crossing.	Individuals x10.
<b>Landscape:</b> The policy includes reference to the sensitivity of the National Landscape, but des not include compensation for additional impacts on National Landscape which should be added to the policy.	Cranborne Chase Area of Outstanding Natural Beauty.

Table 5.54 [Policy 42 Land at Dead Maid Quarry Employment Area, Mere] key issues

Key issues raised (Policy 42 - Land at Dead Maid Quarry Employment Area, Mere)	Respondent(s)
<b>General</b>	
<p><b>Consideration of the Cranborne Chase Area of Outstanding Natural Beauty (AONB):</b> Due to the site's close proximity to the Cranborne Chase AONB, it is important the policy reflects the need for development to be delivered in a manner which is sensitive to it's location close to AONB, with provision being made for the necessary compensation of impacts.</p>	<p>Cranborne Chase Area of Outstanding Natural Beauty.</p>



Table 5.55 [Policy 43 - Land safeguarded for education at Tanner's Lane, Shrewton] key issues

Key issues raised (Policy 43 - Land safeguarded for education at Tanner's Lane, Shrewton)	Respondent(s)
<b>Education</b>	
<b>Support:</b> The policy is supported, to enable growth at Shrewton.	St Philips Land Ltd.
<b>Existing education capacity:</b> The allocation of land safeguarded for education purposes is not necessary because there is spare capacity for an existing 23 pupils on the existing roll – more than would be required to meet the 70 homes allocated to Shrewton.	Individuals x10.
<b>Scope to expand existing school site:</b> The allocation of land safeguarded for education purposes is not necessary because when the primary school was permitted in 2008 the plans included the potential (still not yet implemented) for a 5th classroom which would provide reasonable alternative provision for additional accommodation, should it indeed prove necessary.	Individuals x10.
<b>Flood risk</b>	
<b>Flood risk:</b> With flood risk present in Shrewton, the design of any education facility must ensure it is on land suitably outside of the flood zones.	Environment Agency.

## Local Plan section 4: Strategy for the Swindon HMA

**5.26** Please see below the key issues tables listing the key issues raised for the parts of the plan within section 4: Strategy for the Swindon HMA, namely:

- Strategy for Swindon Housing Market Area
- Policy 44: Marlborough Market Town
- Policy 45: Land at Chopping Knife Lane
- Policy 46: Land off Barton Dene
- Policy 47: Royal Wootton Bassett Market Town
- Policy 48: Land at Marsh Farm
- Policy 49: Land at Midge Hall Farm
- Policy 50: Land West of Maple Drive
- Policy 51: Land at Woodshaw

Table 5.56 [Strategy for the Swindon HMA] key issues

Key issues raised (Strategy for the Swindon HMA)	Respondent(s)
<b>Housing requirement</b>	
<p><b>Housing requirement for Royal Wootton Bassett too low / should be higher:</b> The housing growth for Royal Wootton Bassett, set out in Paragraph 4.10, is too low. The level of housing for the Swindon HMA does not adequately consider the sustainability of Royal Wootton Bassett to accommodate strategic and non-strategic levels of growth to meet further housing needs and to support existing facilities and services. There is a need to increase the housing requirement in the Plan from the Standard Methodology derived figure and respond to local needs.</p>	<p>TOF Corporate Trustees Ltd; David Wilson Homes; Bellway Homes; Castlewood Commercial Properties.</p>
<p><b>Increase housing requirement figure for Swindon rural area / outside of market towns:</b> The level of housing identified for the Swindon HMA does not adequately take into consideration the sustainability of locations in the rural area (e.g., Cricklade, Lyneham, Purton) to accommodate non-strategic levels of growth to meet future housing needs and to support existing facilities and services. The housing requirement for the Swindon HMA should be increased, including an increase in housing growth for the Rural Area. The Local Plan Review, instead of only referring to issues which constrain the delivery of development to meet local needs, should take a positive approach to resolving infrastructure capacity and delivery issues.</p>	<p>Bellway Homes; Castlewood Commercial Properties.</p>
<p><b>Plan period:</b> The housing requirement figure does not cover a sufficient length of time. This should be lengthened with development needs then reflecting this revised period.</p>	<p>TOF Corporate Trustees Ltd; Bellway Homes; Castlewood Commercial Properties.</p>
<b>Rural housing delivery</b>	
<p><b>Reliance on rural housing delivery from neighbourhood plans:</b> The constraints that affect Marlborough, principally the National Landscape, affect a large proportion of the HMA, including many villages within the rural area. Paragraph 4.220 states that outside of the market towns, the scale of growth is broadly equivalent to past rates of housing development. However, Policy 2 is more restrictive and heavily reliant on neighbourhood planning. It is not justified to assume that housing development will continue within a constrained area without an effective policy framework to deliver it.</p>	<p>Richborough Estates.</p>
<p><b>Allow villages to expand:</b> No provision has been made to assist in the delivery of rural housing. For villages to be sustainable they need to be able to expand as they have done over the previous centuries.</p>	<p>Individuals x10.</p>
<b>Swindon and West of Swindon</b>	
<p><b>The Spatial Strategy should consider Swindon / West of Swindon:</b> The Spatial Strategy is premised on a flawed assumption that there is no need for additional sites on the western edge of Swindon as Swindon is meeting its own needs. This fails to recognise, or acknowledge, that development opportunities at the western</p>	<p>Persimmon Homes Wessex; Cooper Estates ; Barratt David Wilson; Thames Valley Chamber of Commerce.</p>

Key issues raised (Strategy for the Swindon HMA)	Respondent(s)
<p>edge of Swindon are located within Wiltshire and therefore can contribute to the housing needs of Wiltshire over the plan period and are sustainably located to do so. Basing the delivery strategy on the assumption that there is no requirement to consider development opportunities on the western edge of Swindon is a flawed approach and is inconsistent with national policy and not justified. The development opportunities on the western edge of Swindon were not considered in any of the alternative development strategies for the Swindon HMA and not considered as part of Site Selection or Sustainability Appraisal, which is unjustified.</p>	
<p><b>Allocate land to meet growth needs at/near Swindon area:</b> In order for the Plan to be found sound the Local Plan needs to allocate additional land for housing and for the strategy to be found sound, this should include consideration of housing delivery near Swindon / West of Swindon. To assist this, allocations should be sited there (to the west of Swindon) to help address some of the Plan's shortfalls in housing delivery.</p>	<p>Mac Mic Group; Persimmon Homes Wessex; Cooper Estates; Barratt David Wilson.</p>
<p><b>Plan fails to recognise Swindon:</b> The failure to identify Swindon as a Principal Settlement compromises the potential soundness and effectiveness of the policy. Policies 44 to 51 do not take advantage of the locational benefit of development more closely associated with Swindon existing built up area.</p>	<p>Thames Valley Chamber of Commerce.</p>
<p><b>Failure on duty to cooperate with Swindon:</b> The evidence published for the Duty to Co-operate is significantly out of date, with the September 2023 report based upon a Statement of Common Ground with Swindon Borough Council from March 2020 within its appendices. This is now three and a half years old. The report itself indicates that discussions have not taken place recently. Swindon Borough Council resolved to restart their local plan process in December 2022, nearly one year ago. This should have resulted in a restart of the Duty to Cooperate with Wiltshire Council having adequate time from this decision in 2022 prior to the publication of their Regulation 19 consultation. It is understood that there are materially different circumstances in play in terms of housing need from when discussions previously took place.</p>	<p>Barratt David Wilson.</p>
<p><b>Omission sites</b></p>	
<p>The following sites, that have not already been assessed through the site selection process, were promoted as omission sites:</p> <ul style="list-style-type: none"> <li>• Additional TOF Land to the West of Royal Wootton Bassett [TOF Corporate Trustees Ltd]</li> <li>• Land at Godby's Farm, Cricklade [Bellway Homes]</li> <li>• Land at South Pavenhill Farm, Purton [Castlewood Commercial Properties]</li> <li>• Land at Pavenhill, Purton [Hills Homes]</li> <li>• Land at Green Farm, Lyneham [Gladman]</li> <li>• Land at The Pry [Mac Mic Group]</li> </ul>	<p>TOF Corporate Trustees Ltd; Bellway Homes; Castlewood Commercial Properties; Hills Homes; Gladman; Mac Mic Group; Persimmon Homes Wessex; Cooper Estates; Barratt David Wilson.</p>

Key issues raised (Strategy for the Swindon HMA)	Respondent(s)
<ul style="list-style-type: none"> <li>• Washpool, West of Swindon [Persimmon Homes Wessex]</li> <li>• Land north of The Elms, West of Swindon [Cooper Estates]</li> <li>• Land at Seven Bridges, A419, Swindon [Barratt David Wilson]</li> </ul>	
<p>The following sites, that have already been assessed through the site selection process, were promoted as omission sites:</p> <ul style="list-style-type: none"> <li>• Land North of Whitehill Lane, Royal Wootton Bassett [TOF Corporate Trustees Ltd]</li> <li>• Land East of A3102, Royal Wootton Bassett [TOF Corporate Trustees Ltd]</li> </ul>	TOF Corporate Trustees Ltd.

Table 5.57 [Policy 44 - Marlborough Market Town] key issues

Key issues raised (Policy 44 - Marlborough Market Town)	Respondent(s)
<b>Policy support</b>	
<b>Support Chopping Knife Lane allocation:</b> Conditionally support allocation at Chopping Knife Lane for approximately 50 dwellings to help meet housing need.	The Crown Estate.
<b>Support Land at Barton Dene allocation:</b> Conditionally support allocation at Land at Barton Dene to help meet housing need, notwithstanding the fact that the site could accommodate more housing to support housing delivery at the town.	Marlborough College.
<b>Infrastructure</b>	
<b>Water supply infrastructure requirements:</b> Paragraph 4.224 notes that, due to water supply capacity constraints in the area, developers should undertake necessary engagement with Thames Water to ensure development does not outpace delivery of essential network upgrades needed to accommodate future development. The Infrastructure Delivery Plan (IDP) includes a section of Water at Appendix 1d with a range of anticipated projects by settlement but does not contain any information relating specifically to Marlborough. It is suggested that the Council liaises with Thames Water to provide consistent information with regards to any necessary upgrades to infrastructure that are planned/required in Marlborough to accommodate future anticipated growth and their anticipated delivery and reflects these in the Infrastructure Delivery Plan. This information would help demonstrate that the Local Plan is sound, has been positively prepared and is deliverable over the plan period (paragraph 35 of the NPPF).	The Crown Estate.
<b>Healthcare capacity:</b> Concerns about the capacity of GP's and dentists to cope with the proposed levels of growth (some residents reporting it is already difficult to get a doctors / dentist appointment).	Individuals x20; Preshute Parish Council.
<b>Road network:</b> Concerns regarding the capacity of the road network / infrastructure to deal with the planned growth were raised. Some reported the network is already susceptible to severe traffic congestion given the town sits on a crossroads between the A4 and the A346 (congestion possibly heightened when the improved link to the M5 via the A419 is completed). Policy 44 does not appear to deal with these constraints and the impact on the transport network does not appear to have been assessed. Some noted that development should encourage sustainable modes of transport.	Individuals x20; College Fields and Barton Park Residents Association.
<b>Education capacity:</b> Concerns were raised about the capacity for education providers / schools to deal with the additional growth.	Individuals x10; Preshute Parish Council.

Key issues raised (Policy 44 - Marlborough Market Town)	Respondent(s)
<b>Sewage treatment works capacity:</b> Concerns were raised about the capacity for sewage treatment works to cope with additional growth. Some respondents reported the services already being at capacity with foul treatment plant(s) / Thames Water undertaking many unauthorised free discharges of untreated black water into the Kennet each year.	Individuals x10; Marlborough Town Council; Preshute Parish Council.
<b>Parking capacity:</b> Reports that parking is already difficult in the town and concerns lodged that further growth will only add to these problems and reduce the capacity for residents / visitors to park.	Individuals x10; Preshute Parish Council.
<b>Other services:</b> Concerns raised about the capacity of other services to deal with proposed levels of growth, E.G., leisure centre, police, shops, parks, public transport, public refuse and public spaces.	Individuals x10.
<b>Constraints</b>	
<b>Air quality:</b> Concerns regarding the impact of development on air quality. Policy 44 does not appear to deal with the issue of air quality which is an important constraint to tackle. It does not appear clear how the impact of 600 homes and employment land been tested in air quality terms?	Individuals x20; College Fields and Barton Park Residents Association; Preshute Parish Council .
<b>Flooding:</b> Concerns were raised about the impacts of proposals on flooding at the town. Some suggested the high street already floods regularly.	Individuals x10.
<b>National Landscape</b>	
<b>Support for approach to development within the National Landscape:</b> Given the extent of the National Landscape around the town support was lodged for the approach the Local Plan has taken in allocating land for development based on its suitability and having regard to the NPPF paragraph 175 requirement that such land has 'the least environmental or amenity value'.	Marlborough College.
<b>Landscape and Visual Impact Assessment:</b> The site assessments at the final stage should have included a landscape sensitivity assessment rather than a sustainability appraisal / no proportionate environmental assessment (E.G., LVIA) has been undertaken to justify and / or assess impact of proposals on the National Landscape.	Individuals x10; Preshute Parish Council; North Wessex Downs AONB.
<b>Unjustified / unsuitable development within National Landscape:</b> Housing and employment proposals are not reflective of the environmental constraints in and around Marlborough, namely the National Landscape and the need to protect this natural asset and its associated biodiversity. Proposing 600 new homes are built is unsound as it ignores national policy in paras 176 and 177 of the NPPF and other policies within the Local Plan itself. Proposed allocations are also viewable from surrounding footpaths (E.g., Wansdyke and White Horse	Individuals x20; North Wessex Downs AONB; Preshute Parish Council; Kennet Valley Parish Council.

Key issues raised (Policy 44 - Marlborough Market Town)	Respondent(s)
Trail and the Wessex Ridgeway.) The approach to develop to such an extent into the National Landscape appears unjustified and / or not positively prepared and no exceptional circumstances have been outlined. We should not be building on greenfield land within the National Landscape.	
<b>Housing &amp; employment</b>	
<b>Housing / employment figure too high / unjustified:</b> Housing / employment growth figure is too high / unjustified. No explanation or justification for 600 homes being chosen as suitable for Marlborough nor 1.8ha of employment land. This arbitrary split around the county of growth does not reflect the cumulative and individual impacts of development or the individual characteristics and constraints of each town. This is not reflective of the constrained nature of the settlement with a dwindling supply of greenfield land.	Individuals x20; Preshute Parish Council; College Fields and Barton Park Residents Association; Kennet Valley Parish Council.
<b>Housing figures are not accurate:</b> Challenge received that housing figures are not accurate in terms of completions and commitments and / or it's hard to verify housing figures without detailed breakdown of completions and commitments.	Individual x10; Preshute Parish Council; Richborough Estates.
<b>Small site allowance achievability, accuracy and reliance:</b> Challenge to small site allowance being achievable, accurate and something to rely on for housing delivery. The Local Plan does not explain how this number was chosen or on what evidence it was based (110 for Marlborough).	Individual x10; Richborough Estates; Preshute Parish Council.
<b>Out commuting:</b> With few employment opportunities within the town, the increase in population would result in the majority of new residents needing to travel elsewhere for employment.	Marlborough Town Council.
<b>Distribution of growth not appropriate / too low for Swindon Housing Market Area (HMA)/Marlborough:</b> Given problems with housing delivery in Royal Wootton Bassett and rural nature of rest of HMA, it is not appropriate to reduce proportion proposed at Marlborough. Similarly the revised spatial strategy appears to distribute a small level of growth to Swindon HMA. Housing Needs Assessments (see Local Housing Needs Assessment Update: Volume I, May 2022; Figure 6 and paragraph 15) suggest increased housing need within Swindon HMA which, coupled with Marlborough's high house prices (see MANP, 2023; paragraphs 2.22 to 2.26) indicate more housing should be allocated to the Swindon HMA and Marlborough.	Marlborough College.
<b>Need for greater policy flexibility in delivering employment land:</b> The higher end of the range of office need in Marlborough is being provided for in the emerging Local Plan. In the event that demand for this upper figure is not realised, sufficient flexibility should be provided in the planning policies to allow consideration of an alternative configuration/ balance of uses.	Marlborough College.
<b>Greenfield and brownfield development</b>	



Key issues raised (Policy 44 - Marlborough Market Town)	Respondent(s)
<p><b>Prioritise brownfield development:</b> The policy, and wider local plan, should prioritise brownfield / infill development over the selection of greenfield sites for development. Agricultural land loss should be minimised and avoided wherever possible.</p>	<p>Individuals x10; Marlborough Town Council.</p>
<p><b>Affordable housing</b></p>	
<p><b>Affordable housing need at Marlborough unmet:</b> There is an affordable housing need in Marlborough with house prices high at the town. However, allocations within the Local Plan have not suitably satisfied this need which will both fail to meet affordable housing need and further worsen the affordability situation. It appears housing allocations at Marlborough are based on land availability and constraints and not housing need. The Local Plan should allow flexibility that should land become available to meet this need, development will be supported for housing and affordable housing.</p>	<p>Marlborough College.</p>
<p><b>Affordable housing need not as high as suggested:</b> The need for affordable homes is only used as a mechanism to deliver housing in Marlborough. The evidence shows that in Marlborough there is a surplus of affordable homes with only one third of affordable homes made available being let to local people. No evidence of actual numbers of affordable houses required or justified have ever been given. Affordable housing is well provisioned in existing large scale building projects at the town.</p>	<p>Individuals x10.</p>
<p><b>Consultation</b></p>	
<p><b>Consultation not undertaken correctly / thoroughly:</b> Proposals within the Local Plan (for Marlborough) have never been consulted upon until now (Regulation 19 September - November 2023) / the Statement of Community Involvement appears not to have been followed.</p>	<p>Individuals x10; Preshute Parish Council.</p>
<p><b>Neighbourhood planning</b></p>	
<p><b>Chopping Knife Lane rejected from Neighbourhood Plan site selection process:</b> The Chopping Knife lane site had been removed from the Marlborough Area Neighbourhood Plan following objections from residents. This is not reflected in the manner in which policy 44 aims to meet the housing need.</p>	<p>Marlborough Town Council.</p>
<p><b>Land at Barton Dene objections:</b> The site at Barton Dean had received many objections from residents and Preshute Parish Council, resulting in the Parish withdrawing from the MANP</p>	<p>Marlborough Town Council.</p>
<p><b>Housing and employment growth different to that suggested the Marlborough Area Neighbourhood Plan needed to meet:</b> The scale of growth within the Local Plan is not consistent, and higher, than that suggested the Marlborough Area Neighbourhood Plan should meet for both housing and employment.</p>	<p>Individuals x20; Marlborough Town Council; Preshute Parish Council; College Fields and Barton Park Residents Association.</p>

Key issues raised (Policy 44 - Marlborough Market Town)	Respondent(s)
<b>Local Plan ignores the Marlborough Area Neighbourhood Plan and Preshute Neighbourhood Plan:</b> The Local Plan ignores the proposals within the Marlborough Area Neighbourhood Plan and / or the Preshute Neighbourhood Plan.	Individuals x20; Preshute Parish Council; Kennet Valley Parish Council.
<b>Duty to Cooperate</b>	
<b>Not engaged with National Landscape boards:</b> Proposals in Marlborough appear to have been formulated without due discussions with National Landscape board and thus this does not comply with the duty to cooperate.	Individuals x10; Preshute Parish Council.
<b>Settlement Boundary</b>	
<b>Settlement boundaries need updating:</b> The Policies Map that accompanies the Local Plan Review will require updating to bring allocated sites within the settlement boundary for Marlborough.	Marlborough College.

Table 5.58 [Policy 45 - Land at Chopping Knife Lane] key issues raised

Key issues raised (Policy 45 - Land at Chopping Knife Lane)	Respondent(s)
<b>Policy support</b>	
<b>Support allocation:</b> Conditionally support the allocation of land at Chopping Knife Lane and is committed to working with the Council and other stakeholders to bring the site forward for development.	The Crown Estate.
<b>Infrastructure</b>	
<b>Clarity on water supply infrastructure requirements:</b> Paragraph 4.224 notes that, due to water supply capacity constraints in the area, developers should undertake necessary engagement with Thames Water to ensure development does not outpace delivery of essential network upgrades needed to accommodate future development. The Infrastructure Delivery Plan (IDP) includes a section on Water at Appendix 1d with a range of anticipated projects by settlement but does not contain any information relating specifically to Marlborough. It is suggested that the Council liaises with Thames Water to provide consistent information with regards to any necessary upgrades to infrastructure that are planned/required in Marlborough to accommodate future anticipated growth and their anticipated delivery and reflects these in the IDP. This information would help demonstrate that the Local Plan is sound, has been positively prepared and is deliverable over the plan period (paragraph 35 of the NPPF).	The Crown Estate.
<b>Waste water capacity sufficient:</b> It is not envisaged that there are wastewater capacity issues / concerns in the network in relation to the development of this site. It is recommended developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing (this assuming no foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer).	Thames Water.
<b>Waste water capacity concern:</b> A water cycle study is required. Without this, the associated risks of developing in the Marlborough Sewage Treatment Works (STW) catchment (and Hampshire Avon) have not been adequately assessed. Marlborough STW discharges into the Middle Kennet WFD waterbody (current status at Good or High), which is at the head of the River Kennet SSSI. New development could have a significant effect on the water quality in the SSSI. It must not be allowed to deteriorate due to additional nutrient loading from the STW. Latest compliance figures suggest that Marlborough STWs have very little headroom for additional flows from new development. Thames Water need to seek a Permit variation to remain compliant and protect the SSSI from deterioration. Any additional development within the STW catchment will not be supported by the Environment Agency until a new permit is in place. Therefore, until then, policies 45 and 46 could be unachievable.	Environment Agency.

Key issues raised (Policy 45 - Land at Chopping Knife Lane)	Respondent(s)
<b>Water supply upgrades required:</b> The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan.	Thames Water.
<b>Sewage treatment works capacity concerns:</b> Concerns were raised about the capacity for sewage treatment works to cope with additional growth at this site and the potential for negative impacts upon River Kennet. Some respondents reported the services already being at capacity with foul treatment plant(s) / Thames Water undertaking many unauthorised free discharges of untreated black water into the Kennet each year.	Individuals x10.
<b>Road network capacity and access concerns:</b> Concerns were raised about the capacity and suitability of the road network / infrastructure to deal with the planned growth at this site, namely White Horse Road and junction with A4, both described as already busy (parked cars) and congested. Further development will cause not just congestion, but safety issues. Policy 45 does not appear to deal with this congestion nor assess the impact on the transport network to inform the policy and allocation. Some representors suggested the access to the site is not suitable, parked cars often meaning the access road is single track with poor visibility and compromised safety (one representor suggested Elcot Lane as a suitable alternative access).	Individuals x10; Marlborough Town Council.
<b>Pedestrian travel and safety concerns:</b> There are no safe pedestrian and cycle routes to and from this site and it is too far from the centre to facilitate these modes of travel and will thus increase car use and congestion. Insufficient street lighting adds to this problem, for instance along Elcot Lane.	Individuals x10; Marlborough Town Council.
<b>Healthcare capacity concerns:</b> Concerns about the capacity of the healthcare system to cope with the development of this site.	Individuals x10.
<b>Education capacity concerns:</b> Concerns about the capacity of the education system to cope with the development of this site.	Individuals x10.
<b>Constraints</b>	
<b>River Kennet SSSI:</b> Concerns voiced about the impacts upon the River Kennet SSSI (including potential wastewater discharges into the river) and its associated biodiversity. Site was not included within Marlborough Area Neighbourhood Plan partly for this reason. This section of river has already been restored and is well managed. Development conflicts with other Local Plan policies. It is not apparent how exceptional circumstances have been demonstrated to justify developing next to this SSSI and how the impacts upon this have been assessed.	Individuals x10; North Wessex Downs AONB; Marlborough Town Council.
<b>Character and skyline:</b> Concern raised that building here is fundamentally going to impact on the character of the area and quality of the views looking out towards along the valley and introduce light and noise pollution.	Individuals x10.

Key issues raised (Policy 45 - Land at Chopping Knife Lane)	Respondent(s)
<p><b>Air quality:</b> Concerns raised regarding the impact of development on air quality. The Planning for Marlborough document states that traffic congestion has resulted in air pollution and the creation of the AQMA and commenting that development should not worsen these conditions. Allocating this site does not appear to deal with the issue of air quality which is an important constraint to tackle given the associated impacts upon resident health.</p>	Individuals x10.
<p><b>Heritage:</b> This allocation acknowledges the Grade II listed Elcot Mill and stables yet does not mitigate the impacts upon these assets and their setting. Proposed buffering and screening are inadequate.</p>	Individuals x10.
<p><b>National Landscape</b></p>	
<p><b>Provide a clear justification:</b> There needs to be a clear justification as to whether the proposals represent a “major” development in the context of paragraph 177 of the NPPF (2022) and if necessary, how the exceptional circumstance tests have been met. A key consideration will be the extent to which landscape impacts on the can be moderated.</p>	Natural England.
<p><b>Unacceptable within National Landscape:</b> The development of this greenfield site, a beautiful valley landscape, is contrary to the need to conserve and enhance National Landscapes, as outlined in both national policy and local plan policies. It is hard to see how exceptional circumstances have been demonstrated. Development of this site is not suitable.</p>	Individuals x10; Marlborough Town Council; Preshute Parish Council; Kennet Valley Parish Council.
<p><b>Landscaping:</b> Landscaping will not be sufficient to mitigate impacts of developing this site upon National Landscape. Landscaping requirements illustrate that the site is unsuitable for development and will take many years (20?) to contribute to any screening.</p>	Individuals x10; Preshute Parish Council.
<p><b>Landscape Visual Impact Assessment:</b> No Landscape and Visual Impact Assessment has been carried out and no concept plan has been produced despite the allocations location within the National Landscape.</p>	Individual x10.
<p><b>Policy wording</b></p>	
<p><b>River Kennett SSSI:</b> The policy clause requiring habitat restoration and enhancement in the north of the allocation site as a means of strengthening the River Kennet SSSI corridor needs further detail. The policy should be strengthened by the provision of a minimum ecological corridor requirement for the northern margin of the allocation.</p>	Natural England.
<p><b>River Kennet SSSI:</b> River Kennet SSSI is a sensitive and valuable watercourse which should be acknowledged in the policies.</p>	Environment Agency.
<p><b>River Kennet corridor:</b> Where the River Kennet is mentioned the wording should be adjusted to say / include “... River Kennet and its corridor...”.</p>	Environment Agency.

Key issues raised (Policy 45 - Land at Chopping Knife Lane)	Respondent(s)
<p><b>Skyline:</b> Policy includes the wording "<i>ensuring the development avoids breaking the wooded skyline and limits development to the east of the site, utilising this land to provide a strong strategic landscape buffer to the surrounding countryside to help integrate development</i>". It is not clear which skyline is being referred to and the phrase "limiting development to the east of the site" requires clarity.</p> <p><i>[The Crown Estate "Is it the case that a landscape buffer, and limiting development to 2 storeys, is sufficient as demonstrated by submitted material? Policy 45 should be amended to be in line with policy 91 which states that "ensuring that development considers its site context and provides an effective landscape buffer to the east of the site to help integrate development."]</i></p>	The Crown Estate.
<b>Prioritise brownfield development</b>	
<p><b>Prioritise brownfield development:</b> The policy, and wider local plan, should prioritise brownfield / infill development over the selection of greenfield sites, such as this one, for development. It is not suitable to build on greenfield land, outside of the settlement boundary, within a National Landscape.</p>	Individuals x10.
<b>Neighbourhood Planning</b>	
<p><b>Ignores Neighbourhood Plans:</b> The allocation of this site ignores and overrides the adopted Marlborough Area Neighbourhood Plan and the work / findings underpinning the documents preparation. Local residents strongly objected to this site and the site was subsequently excluded.</p>	Individuals x20; Marlborough Town Council; Preshute Parish Council; Kennet Valley Parish Council.

Table 5.59 [Policy 46 - Land off Barton Dene] key issues

Key issues raised (Policy 46 - Land off Barton Dene)	Respondent(s)
<b>Policy support</b>	
<b>Support allocation:</b> Conditionally support allocation at Land at Barton Dene to help meet housing need, notwithstanding the fact that the site could accommodate more housing to support housing delivery at the town.	Marlborough College.
<b>Infrastructure</b>	
<b>Sewage treatment works capacity concerns:</b> Concerns were raised about the capacity for sewage treatment works to cope with additional growth at this site and the potential for negative impacts upon River Kennet. Some respondents reported the services already being at capacity with foul treatment plant(s) / Thames Water undertaking many unauthorised free discharges of untreated black water into the Kennet each year.	Individuals x20; Kennet Valley Parish Council.
<b>Waste water capacity sufficient:</b> It is not envisaged that there are wastewater capacity issues / concerns in the network in relation to the development of this site. It is recommended developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing (this assuming no foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer).	Thames Water.
<b>Waste water capacity concern:</b> A water cycle study is required. Without this, the associated risks of developing in the Marlborough Sewage Treatment Works (STW) catchment (and Hampshire Avon) have not been adequately assessed. Marlborough STW discharges into the Middle Kennet WFD waterbody (current status at Good or High), which is at the head of the River Kennet SSSI. New development could have a significant effect on the water quality in the SSSI. It must not be allowed to deteriorate due to additional nutrient loading from the STW. Latest compliance figures suggest that Marlborough STWs have very little headroom for additional flows from new development. Thames Water need to seek a Permit variation to remain compliant and protect the SSSI from deterioration. Any additional development within the STW catchment will not be supported by the Environment Agency until a new permit is in place. Therefore, until then, Policies 45 and 46 could be unachievable.	Environment Agency.
<b>Water supply upgrades required:</b> The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan.	Thames Water.
<b>Road network capacity:</b> Concerns raised regarding the capacity and suitability of the road network to deal with the planned growth at this site, quoted roads including the access road to/from the A4 that was suggested to already suffer from congestion. Such congestion already causes delays when travelling to and from this area	Individuals x30; Preshute Parish Council; College Fields and Barton Park Residents' Association; Kennet Valley Parish Council.

Key issues raised (Policy 46 - Land off Barton Dene)	Respondent(s)
with roadworks or diversions causing significant delays. Policy 46 does not appear to deal with this congestion nor assess the impact on the transport network to inform the policy, mitigation and allocation. Such evidence should be made public and inform the policy.	
<b>Pedestrian / sustainable travel and safety concerns:</b> The A4 is narrow and carries many large or heavy vehicles; the A4 is a dangerous road for cyclists with poor air quality. It would be positive if good quality walking and cycling routes were created. The combination of unsafe or unpleasant walking and cycling routes will have an adverse effect on residents' health. The local bus services are poor.	Individuals x10; College Fields and Barton Park Residents' Association.
<b>Access not suitable:</b> Comments outlined the road through Barton Park and College Fields is a small estate road and unsafe for the allocation whilst the road up Barton Dene past the leisure Centre is narrow and steep sided. Some suggested the allocated area has no road frontage and is some distance away from the existing road network with details of access not provided. Access via Barton Dene, a narrow road adjacent to listed buildings, also provides access to Marlborough College and the road is a busy thoroughfare between College facilities, both for vehicles and pedestrians.	Individuals x20; Preshute Parish Council; College Fields and Barton Park Residents' Association.
<b>Healthcare capacity concerns:</b> Concerns about the capacity of the healthcare system to cope with the development of this site.	Individuals x10; Kennet Valley Parish Council.
<b>Education capacity concerns:</b> Concerns about the capacity of the education system to cope with the development of this site. Scepticism was also raised about 'funding contributions towards early years and secondary school education places' and the likelihood of how development at Barton Dene could make any meaningful contribution to the school to accommodate additional pupils.	Individuals x10; Kennet Valley Parish Council.
<b>Insufficient leisure provision:</b> Local leisure centre is not currently in a position to support the existing community, let alone with an increase in residents.	Individuals x10.
<b>Constraints</b>	
<b>Air quality:</b> Concerns raised regarding the impact of development on air quality. The Planning for Marlborough document states that traffic congestion has resulted in air pollution and the creation of the Air Quality Management Area (AQMA) and commenting that development should not worsen these conditions. Allocating this site does not appear to deal with the issue of air quality which is an important constraint to tackle given the associated impacts upon resident health.	Individuals x20; Preshute Parish Council; College Fields and Barton Park Residents' Association; Kennet Valley Parish Council.
<b>Biodiversity loss:</b> Development of this site would lead to the loss of valuable habitat/impacts on species. Some representors quoted the loss of chalk grassland, hedgerows and named species such as hedgehogs and owls. The presence of badger setts was also reported on the east side of access road with representors reporting that development of the site will subsequently be illegal.	Individuals x10.



Key issues raised (Policy 46 - Land off Barton Dene)	Respondent(s)
<b>National Landscape</b>	
<b>Provide a clear justification:</b> There needs to be a clear justification as to whether the proposals represent a “major” development in the context of paragraph 177 of the NPPF (2022) and if necessary, how the exceptional circumstance tests have been met. A key consideration will be the extent to which landscape impacts on the can be moderated.	Natural England; North Wessex Downs National Landscape.
<b>Unacceptable within National Landscape:</b> The development of this greenfield site is contrary to the need to conserve and enhance National Landscapes, as outlined in both national policy and local plan policies. It is hard to see how exceptional circumstances have been demonstrated. Development of this site is not suitable.	Individuals x40; Preshute Parish Council; Kennet Valley Parish Council.
<b>Landscape (general):</b> The allocated greenfield site has numerous trees and is on sloping ground / valley with little level ground within the site boundary. The allocated area is open agricultural land, is open to views from regularly used nearby footpaths (e.g., The Wansdyke, Wessex Ridgeway, White Horse Trail) and is not suitable for development.	Individuals x10; Preshute Parish Council
<b>Landscape Visual Impact Assessment or concept plan:</b> Proposals, and the associated impacts, do not appear to have been tested through an environmental assessment such as a Landscape and Visual Impact Assessment despite the allocations location within the National Landscape. This should have been carried out and needs to be.	Individuals x10; Preshute Parish Council .
<b>Employment</b>	
<b>Opposition to employment allocation / need:</b> There should be no employment land allocated in Marlborough or at this site. The need for which appears unclear and / or unjustified by clear evidence. The 2006-2026 Core Strategy contained a proposal for 3ha of Employment land together with 680 houses as a balanced strategy. In the 20- year plan period 720 houses had been built or had permission, but no planning application has ever been submitted for employment land, and no new employment development has taken place. There is no evidence of any demand for employment land in Marlborough. The site is unsuitable for office / industrial use given the natural features on site and the distance from the road network and is contrary to local plan policies 64 (additional employment land) and policy 2 (sets out criteria for mixed use developments and sets out criteria which should be met for employment land).	Individuals x10; Preshute Parish Council; College Fields and Barton Park Residents' Association; Kennet Valley Parish Council.
<b>Impact of employment uses:</b> Unclear if the impact of employment land at the site has been considered as part of the site selection process or has informed policy / mitigation.	Individuals x10; Preshute Parish Council; College Fields and Barton Park Residents' Association.
<b>Prioritise brownfield development</b>	

Key issues raised (Policy 46 - Land off Barton Dene)	Respondent(s)
<p><b>Prioritise brownfield development:</b> The policy, and wider local plan, should prioritise brownfield / infill development over the selection of greenfield sites, such as this one, for development. It is not suitable to build on greenfield land, outside of the settlement boundary, within a National Landscape.</p>	Individuals x10.
<p><b>Site selection / SA</b></p>	
<p><b>SA scoring not justified:</b> In light of the Illustrative Layout and scheme, the Sustainability Appraisal scoring is no longer justified/ evidenced. Both housing (SA Objective 9) and economy (SA Objective 12) should be 'major positive'. Further examples of Objectives that should be attributed higher scores include biodiversity, landscape and transport.</p>	Marlborough College.
<p><b>Stage 2 site selection not correct:</b> At stage 2 of site selection, a rudimentary assessment, land at this site scored red on both landscape and transport grounds, albeit parts of the site appeared to score amber which was unexplained. The red scores, and associated qualitative assessment at stage 2 of the site selection process, indicate the site as unsuitable for development. Furthermore, the mitigation that stage 2 of the site selection process suggested that was required to alleviate congestion, poor air quality, visual impact on the AONB and provide good accessibility is not stated.</p>	Individuals x10; College Fields and Barton Park Residents' Association; Preshute Parish Council.
<p><b>Masterplan / site area</b></p>	
<p><b>Masterplan required:</b> There should have been a masterplan to outline how the housing and employment land are intended to come forward. This would help to illustrate how the allocation relates to the Marlborough Area Neighbourhood Plan allocation, outline how mitigation is achievable and so on. The absence of this means details of the development on site are not present to enable comments to be issued on the proposal.</p>	Individuals x10; Preshute Parish Council.
<p><b>Large site area:</b> The area allocated for development is 9.4 hectares and is far larger than that required for the scale of development described and in the absence of a concept plan it is unclear how the development will take shape. The development is 1.8 hectares of employment uses plus 30 houses. This can be accommodated in a much smaller area than the allocated 9.4ha. Proposing a site allocation whose area greatly exceeds the proposed development could lead to further development on the site unless a master plan is produced.</p>	Individuals x10; Preshute Parish Council.
<p><b>Consultation</b></p>	
<p><b>Not previously consulted:</b> The proposals in Policy 46 for a business park, industrial estate and housing have not been consulted upon prior to this stage of consultation.</p>	Preshute Parish Council.
<p><b>Policy wording</b></p>	

Key issues raised (Policy 46 - Land off Barton Dene)	Respondent(s)
<p><b>Landscape enhancement not quantified:</b> There is no concept plan for the allocation and the policy provides no minimum requirement for the undeveloped areas. Policy should be strengthened by the provision of a minimum requirement for green infrastructure designed to minimise landscape impacts on the western and eastern areas of the allocation.</p>	<p>Natural England.</p>
<p><b>Landscape mitigation not appropriate:</b> The policy takes a negative approach to hide development via landscape mitigation, in an area characterised by open landscape.</p>	<p>North Wessex Downs National Landscape.</p>
<p><b>Landscape mitigation on built form and extent:</b> Restrictions should be included to define either height parameters or no development beyond a set contour.</p>	<p>North Wessex Downs National Landscape.</p>
<p><b>Housing number:</b> The number of homes the site can deliver should reflect the evidenced need for additional homes in the Town and the capacity work undertaken to inform the Illustrative Layout. Policy wording should subsequently suggest the delivery of at least 40 dwellings and 1.8ha for employment uses.</p>	<p>Marlborough College.</p>
<p><b>Neighbourhood Planning</b></p>	
<p><b>Site objections:</b> The site at Barton Dean had received many objections from residents and Preshute Parish Council, resulting in the Parish withdrawing from the MANP.</p>	<p>Individuals x10; Marlborough Town Council.</p>
<p><b>Ignores Neighbourhood Plans:</b> The allocation of this site ignores and overrides the adopted Marlborough Area Neighbourhood Plan and Preshute Neighbourhood Plan and the work / findings underpinning the documents preparation. Local residents strongly objected to this site and the site was subsequently excluded.</p>	<p>Individuals x30; Marlborough Town Council; College Fields and Barton Park Residents' Association; Preshute Parish Council; Kennet Valley Parish Council.</p>

Table 5.60 [Policy 47 - Royal Wootton Bassett Market Town] key issues

Key issues raised (Policy 47 - Royal Wootton Bassett Market Town)	Respondent(s)
<b>Housing</b>	
<p><b>Site Selection Process:</b> Concern is raised over the simplicity and subjective nature of the scoring criteria for sites. Site selection process and methodology is unclear, resulting in confusion as to why certain sites have been selected over others with a perceived overreliance on large sites. Concern is raised over the distribution of sites within the rural area. The Policy fails to satisfactorily address the creation of sustainable, safe and healthy communities, currently these aspirations are to be “promoted”, with no specific mechanism for their delivery. Place Shaping Priorities have not been adequately taken forward.</p>	<p>Royal Wootton Bassett Town Council; Gleeson Land; Cllr S Bucknell; Costain Ltd; Lydiard Tregoze Parish Council; Individuals x20.</p>
<p><b>Swindon Overspill:</b> Quantity of housing is excessive and unsustainable. Concern is raised that overspill from Swindon will not contribute to vitality of RWB.</p>	<p>Individuals x10.</p>
<p><b>Location of Housing:</b> Housing proposed for Lydiard Tregoze should be delivered in RWB. Concern is raised over allocations relating to RWB but within the Lydiard Tregoze Parish and whether CIL funding would be issued to Lydiard Tregoze when it is needed by RWB. The overall housing target for RWB is excessive with concerns raised as to whether local infrastructure is sufficient to handle the level of growth identified and the impact to the character of RWB and surrounding settlements, with housing allocations increasing coalescence of settlements (primarily RWB relationship Swindon). Landscape impact resulting from the siting of allocations is repeatedly raised as a key concern, including harm to the setting of North Wessex Downs National Landscape.</p> <p>Allocations at Manor Farm and Midge Hall Farm should be moved to the south of RWB, where they would better relate to existing employment opportunities. Multiple representations are made promoting omitted sites to the south of RWB for inclusion in the plan, highlighting that WC should use its powers to purchase land currently obstructing the delivery of development to the south (identified as land required for bridge over railway).</p>	<p>Lydiard Tregoze Parish Council; Lydiard Millicent Parish Council; Richborough Estates; Cllr S Bucknell; Costain Ltd; Individuals x20.</p>
<p><b>Plan Period:</b> The Plan period should be extended to 2040 and associated housing requirement adjusted.</p>	<p>TOF Corporate Trustees Ltd.</p>
<p><b>Housing Quantity:</b> Housing figure of 1,230 is incorrect – should be updated to 1,340 as overall delivery figure (noted figure does not include current builds or approved planning applications). The housing figure within the policy should be viewed as a minimum quantity. Scale of allocations relating to Lydiard Tregoze Parish threaten the character of the parish.</p>	<p>Royal Wootton Bassett Town Council; Lydiard Tregoze Parish Council; NHS ICB; L and Q Estates; Cllr S Bucknell; Lydiard Millicent Parish Council; Individuals x10.</p>

Key issues raised (Policy 47 - Royal Wootton Bassett Market Town)	Respondent(s)
<p><b>Infrastructure:</b> Suggested that there is insufficient placemaking (inc. provision of greenspaces) and supporting infrastructure existing or planned (e.g. existing healthcare and school capacity limitations and community facilities) to support planned growth. Concern is raised that capacity of local utilities has been overlooked. Contributions must be secured to deliver infrastructure to support new development, with concern raised that piecemeal development will circumvent this. Criteria 10 should be removed following change to Water Act 1991.</p>	<p>Lydiard Tregoze Parish Council; Cllr S Bucknell; Costain Ltd; Swindon Borough Council; Royal Wootton Bassett Town Council; Lydiard Millicent Parish Council; NHS ICB; David Wilson; Leda Properties; Individuals x30.</p>
<b>Transport</b>	
<p><b>Duty to Cooperate:</b> WC has failed in its duty to cooperate with National Highways and with SBC over the capacity at J16 of the M4.</p>	<p>Cllr S Bucknell.</p>
<p><b>Transport Evidence Base (TEB):</b> The following key issues have been raised:</p> <ul style="list-style-type: none"> <li>• The Atkins TEB prepared in support of the LPR 2022 uses a different base transport model.</li> <li>• Without detailed ISM modelling it is not possible to accurately assess.</li> <li>• Use of generic/TRICS trip rates with blended use classes has the potential to underestimate traffic generation of employment sites and traffic associated with these sites is not loaded onto the network using the exact site locations.</li> <li>• The Atkins TEB (ISM strategic level model) is not suitable for detailed analysis of specific sections of the network or junction performance.</li> <li>• Traffic flow should be compared to 2018 base scenario.</li> <li>• Work done by Atkins appears to use incorrect allocations and omits others.</li> <li>• Does not properly assess M4 Junction 16.</li> </ul> <p>Policy 47 is therefore not justified, given the TEB is insufficient to thoroughly test the impact of the proposed site allocations.</p>	<p>Royal Wootton Bassett Town Council; Lydiard Tregoze Parish Council; National Highways; Individuals x10.</p>
<p><b>Traffic Generation:</b> Requirement for an additional spatial policy which knits together individual site components around RWB and considers the ability to accommodate future traffic growth. Further work on the M4 transport/growth corridor is required, with M4 Junction 16 and those A roads feeding it suggested as being at capacity with no improvements identified within the IDP to support further growth in the locality. It is put forward that allocations were made before junction capacity was reviewed and that no operational assessment (OA) for the junction has been prepared to date to demonstrate compliance with NPPF and DfT Circular 01/2022. Lack of an OA will lead to delay to future applications when impacts are reviewed at application stage and the wording of Criteria 4 that the Council will ‘investigate’ opportunities to address congestion is insufficient.</p>	<p>Swindon Borough Council; National Highways; Cllr S Bucknell; Costain Ltd; Lydiard Millicent Parish Council; Lydiard Tregoze Parish Council; David Wilson; Leda Properties; Royal Wootton Bassett Town Council; Individuals x20.</p>

Key issues raised (Policy 47 - Royal Wootton Bassett Market Town)	Respondent(s)
<b>Site Specific Transport Concerns:</b> The Plan does not sufficiently consider the transport impacts of allocations around RWB and their impact on the A3102 and contributing minor roads (namely C414). It is suggested that given their isolation residents of these communities would be car dependant.	Costain Ltd; Lydiard Tregoze Parish Council; Lydiard Millicent Parish Council; Individuals x10.
<b>Sustainable Transport:</b> Suggested that there is a lack of suitable alternative sustainable transport modes/infrastructure planned to support allocations.	Individuals x10.
<b>Bypass:</b> The bypass referenced within the Planning for Royal Wootton Bassett document is not carried through to Policy 47.	Individuals x10.
<b>Employment Allocations</b>	
<b>Employment Quantity:</b> Suggested that quantity of employment is insufficient (1.9ha provided against 6.9ha requirement).	Lydiard Millicent Parish Council.
<b>Location of Employment:</b> Suggested that employment allocations will not add value to local economy or bring employment to local communities due to their isolation. Distribution of economic growth suggested as being unsound and inconsistent with national policy. Insufficient support for rural businesses, contrary to NPPF paragraph 85.	Pegasus Group; Swindon Borough Council; Individuals x10.
<b>Ad-Hoc Development:</b> Noted that there are a number of unallocated potential sites within the area which represent a challenge to deliver a comprehensive approach to sustainable growth.	Swindon Borough Council; Lydiard Millicent Parish Council; Individuals x10.
<b>Green Infrastructure</b>	
<b>Canal:</b> Site allocations (namely site 5) fail to consider potential to restore sections of the canal. Suggested that Criteria 8 wording is insufficient and should include reference to structures and diversions and reference to securing funding via development.	Wiltshire Swindon & Oxford Canal Partnership; Individuals x2.
<b>Neighbourhood Plan</b>	
<b>Alteration to housing figures:</b> The amended approach for 150 dwellings within the RWB NP area is unjustified and inconsistent with the NPPF. There is unsuitable availability of small sites, and it is suggested that alternative sites are considered.	Royal Wootton Bassett Town Council; Gleeson Land; Individual x6.
<b>Climate Change</b>	
<b>Flood Risk:</b> No plan in place to mitigate flood risk. Allocations would remove floodplains. No consideration given to how development would increase flood risk elsewhere.	Lydiard Millicent Parish Council; Lydiard Tregoze Parish Council; Cllr Bucknell; Individuals x22.

Key issues raised (Policy 47 - Royal Wootton Bassett Market Town)	Respondent(s)
<b>Ecology</b>	
<b>Site Specific Ecology Impact:</b> Concerns raised over impact of Marsh Farm allocation on local ecology, namely Jubilee Lake LNR.	Lydiard Millicent Parish Council; Individuals x10.
<b>Heritage</b>	
<b>Heritage Impact:</b> Regarding Site 8, no reference of consultation with Heritage Society regarding impact to Listed Heritage Assets.	Individuals x10.
<b>Consultation</b>	
<b>Limited engagement:</b> Insufficient engagement with local community in preparation of plan. Consultation not genuinely accessible and website difficult to navigate.	Cllr S Bucknell; Costain Ltd; Individuals x10.

Table 5.61 [Policy 48 - Land at Marsh Farm, Royal Wootton Bassett] key issues

Key issues raised (Policy 48 - Land at Marsh Farm, Royal Wootton Bassett)	Respondent (s)
<b>Housing</b>	
<b>Settlement Identity:</b> Allocation will be detrimental to the character of RWB together with neighbouring parishes and will increase coalescence to surrounding settlements (e.g. Hook and Swindon).	Cllr S Bucknell; Lydiard Millicent Parish Council; Individuals x10.
<b>Quantity:</b> Housing target for RWB is excessive, particularly with current infrastructure. Conversely, certain parties have pushed for an increase to circa 200 dwellings.	Lydiard Millicent Parish Council; Leda Properties; Cllr S Bucknell.
<b>Infrastructure:</b> Unclear how infrastructure (e.g. education, healthcare etc) required for this allocation will be delivered, with policy wording amendments suggested to address this. Concern raised that piecemeal development will not individually set aside land for required infrastructure.	Royal Wootton Bassett Town Council; Lydiard Tregoze Parish Council; Individuals x10
<b>Landscape Impact:</b> Allocation will have an unacceptable landscape impact. Site was previously dismissed at appeal partly on landscape grounds.	Cllr S Bucknell; Individuals x10.
<b>Location:</b> Suggested that development may be better suited to south of RWB where employment areas are more accessible. Suggested that soft landscaping around the M4 cannot be relied upon as screening mitigation to development due to it falling within NH ownership. Concern over edge of parish development and distribution of CIL and S106 between parishes.	National Highways; Lydiard Tregoze Parish Council; Royal Wootton Bassett; Lydiard Millicent Parish Council; Cllr A Bucknell; Individuals x10.
<b>Site Allocation:</b> Allocation of sites and scoring process is overly simplistic and reasoning for allocation of certain sites is unclear.	Cllr S Bucknell.
<b>Site Specific Constraints</b>	
<b>Drainage:</b> Site has previously dismissed at appeal partly on drainage grounds. Concern raised over impact to Thunderbrook watercourse.	Cllr S Bucknell; Lydiard Millicent Parish Council; Individuals x10.
<b>Ecological Impact:</b> Development of this site is unlikely to meet aspirations of Policy 47(7). Will have a detrimental impact to biodiversity. Recommended to include visitor management to Jubilee Lake LNR. Concept plan should include green infrastructure at south of site.	Cllr A Bucknell; Natural England; Individuals x10.
<b>Utilities:</b> Suggested that capacity of existing utilities (water supply; foul water) has not been assessed. Utilities (water supply) likely to require upgrading to support allocation.	Royal Wootton Bassett Town Council; Lydiard Millicent Parish Council; Thames Water.
<b>Heritage:</b> Noted that SA recommends an HIA for this site and it is unclear whether this has been done or whether LA heritage officers are happy with policy caveats.	Historic England.



Key issues raised (Policy 48 - Land at Marsh Farm, Royal Wootton Bassett)	Respondent (s)
<b>Transport</b>	
<b>Traffic Generation:</b> Concern raised over existing traffic congestion. Additional development will lead to increased pressure on M4 Junction 16 and surrounding connecting roads. It is suggested that a Operational Assessment is required. Noted that traffic data used to assess sites is out of date and the impacts to the road network have not been fully assessed.	Cllr A Bucknell; Cllr S Bucknell; Lydiard Millicent Parish Council; Royal Wootton Bassett Town Council; National Highways; Individuals x10.
<b>Sustainable Transport:</b> Poor sustainable transport options leading to increased pressure on RWB High Street from traffic to access jobs/services. Unclear how sustainable transport options will be delivered.	Lydiard Millicent Parish Council; Lydiard Tregoze Parish Council; Royal Wootton Bassett Town Council; Individuals x10.
<b>Consultation</b>	
<b>Limited Engagement:</b> No formal consultation with Lydiard Tregoze Parish regarding impact of allocations (suggested as failure of duty to cooperate). Website hard to navigate. Consultation difficult to understand/digest for general public.	Cllr S Bucknell; Individuals x10.

Table 5.62 [Policy 49 - Land at Midge Hall Farm, Royal Wootton Bassett] key issues

Key issues raised (Policy 49 - Land at Midge Hall Farm, Royal Wootton Bassett)	Respondent (s)
<b>Housing</b>	
<b>Settlement Identity:</b> Allocation will be detrimental to the character of RWB and neighbouring parishes and will increase coalescence to surrounding settlements (e.g. Hook and Swindon). Site does not represent good place-making.	Cllr S Bucknell; Cllr A Bucknell; Lydiard Millicent Parish Council; Individuals x10.
<b>Quantity:</b> Overall housing target for RWB should be reduced. Conversely, suggestions are also made that RWB can support more housing. Suggested that there is inconsistency in number of dwellings per hectare.	Lydiard Millicent Parish Council; L & Q Estates.
<b>Infrastructure:</b> Insufficient infrastructure (e.g. healthcare and school capacity) to support quantity of new dwellings allocated, with policy wording alterations suggested to address this. It is unclear how additional infrastructure to support development will be delivered nor whether this has been fully assessed. Concern raised that piecemeal development will not individually set aside land for required infrastructure.	Royal Wootton Bassett Town Council; Lydiard Tregoze Parish Council; Lydiard Millicent Parish Council; Individual x10.
<b>Location:</b> Suggested that development may be better suited to south of RWB where employment areas are more accessible – suggested it is more sensible to site dwellings near existing employment areas. Suggested that soft landscaping around the M4 cannot be relied upon as screening mitigation to development due to it falling within NH ownership. Suggested allocations to the south would result in reduced landscape impact. Concern over edge of parish development and distribution of CIL and S106 between parishes.	Cllr A Bucknell; Cllr S Bucknell; Lydiard Millicent Parish Council; Lydiard Tregoze Parish Council; Royal Wootton Bassett Town Council; National Highways.
<b>Site Allocation:</b> Site review process is over-simplistic and it is unclear why sites at the north of RWB have been favoured over those to the south.	Cllr S Bucknell.
<b>Employment</b>	
<b>Quantity:</b> Insufficient quantity of employment compared to residential will lead to out-commuting and traffic. Conversely, it has also been suggested that employment allocation is high around RWB, and notably higher than identified in the ELR.	Lydiard Tregoze Parish Council; L & Q Estates.
<b>Site Specific Constraints</b>	
<b>Drainage:</b> Suggested that the site has poor drainage and that its development will exacerbate local flooding issues.	Cllr S Bucknell; Lydiard Millicent Parish Council; Individuals x10.
<b>Ecological Impact:</b> Recommended to include visitor management to Jubilee Lake LNR. Policy should include minimum green infrastructure area requirement.	Natural England.

Key issues raised (Policy 49 - Land at Midge Hall Farm, Royal Wootton Bassett)	Respondent (s)
<b>Utilities:</b> Suggested that capacity of existing utilities (water supply; foul water) has not been assessed. Utilities (water supply) likely to require upgrading to support allocation.	Royal Wootton Bassett Town Council; Lydiard Millicent Parish Council; Individuals x10; Thames Water.
<b>Heritage:</b> Suggested HIA may be necessary or views of the LA Conservation Officer.	Historic England.
<b>Transport</b>	
<b>Traffic Generation:</b> Concern raised over existing traffic congestion. Additional development will lead to increased pressure on M4 Junction 16, surrounding connecting roads and RWB High Street, with an Operational Assessment suggested as being required. Noted that traffic data used to assess sites is out of date and the impacts to the road network have not been fully assessed. Lack of infrastructure (e.g. local school availability) will lead to increased traffic into neighbouring areas.	Cllr A Bucknell; Cllr S Bucknell; Lydiard Millicent Parish Council; Lydiard Tregoze Parish Council; National Highways; Individuals x10.
<b>Sustainable Transport:</b> Unclear how sustainable transport options will be delivered. Plan fails to maximise public transport as required by NPPF.	Royal Wootton Bassett Town Council; Go South Coast Ltd; Individuals x10.
<b>Consultation</b>	
<b>Limited Engagement:</b> No formal consultation with Lydiard Tregoze Parish regarding impact of allocations (suggested as failure of duty to cooperate). Website hard to navigate. Consultation difficult to understand/digest for general public.	Cllr S Bucknell; Individuals x10.

**Table 5.63 [Policy 50 - Land west of Maple Drive, Royal Wootton Bassett] key issues**

Key issues raised (Policy 50 - Land West of Maple Drive, Royal Wootton Bassett)	Respondent (s)
<b>Housing</b>	
<b>Quantity:</b> Reduction in housing on the site noted. Suggested that number of dwellings be increased.	Royal Wootton Bassett Town Council; ToF Corporate Trustees Ltd.
<b>Infrastructure:</b> Unclear how infrastructure (e.g. schools, healthcare) to support proposal will be delivered, whether these will be sufficient and what impact this will have on viability.	Royal Wootton Bassett Town Council.
<b>Site Specific Constraints</b>	
<b>Ecological Impact:</b> Provide ongoing support for visitor management and enhanced recreational infrastructure for Jubilee Lake LNR. Include requirement for minimum area of green infrastructure within northern area of site. Concern regarding impact to local springs on site (biodiversity).	Natural England; Individuals x10.
<b>Utilities:</b> Water supply capacity has not been assessed.	Royal Wootton Bassett Town Council.
<b>Transport</b>	
<b>Traffic Generation:</b> Local road network suggested as already being at capacity, namely A3102 and M4 Junction 16, which will be exacerbated by this allocation. Suggested that transport evidence base is out of date and that the cumulative impact on local road network has not been sufficiently assessed or mitigated for.	Cllr S Bucknell; Royal Wootton Bassett Town Council; Individuals x10.
<b>Sustainable Transport:</b> Unclear how sustainable transport infrastructure around the site will be delivered and it is suggested that development should come forward 'subject to infrastructure funding' (to be included in policy wording). Policy suggested as ineffective due to reference to enhance and extend 'existing' sustainable transport, where there is none currently.	Royal Wootton Bassett Town Council; Individuals x10.
<b>Funding</b>	
<b>CIL &amp; S106:</b> Appropriate wording should be added confirming WC liaison with Royal Wootton Bassett Town Council regarding the distribution of S106 contributions.	Royal Wootton Bassett Town Council.

Table 5.64 [Policy 51 - Land at Woodshaw, Royal Wootton Bassett] key issues

Key issues raised (Policy 51 - Land at Woodshaw, Royal Wootton Bassett)	Respondent (s)
<b>Housing</b>	
<b>Settlement Identity:</b> Site allocations will be detrimental to the character of the settlement.	Cllr S Bucknell.
<b>Quantity:</b> The dwelling capacity of the site is not as high as envisaged by this policy. Need for local centre, convenience store and nursery provision questioned.	David Wilson Homes.
<b>Infrastructure:</b> There is insufficient infrastructure to support (namely nurseries, healthcare) the planned number of dwellings and it is unclear how new infrastructure will be delivered, together with a lack of assessment for the viability of delivering this infrastructure. Suggested to include wording to secure Community Infrastructure Levy (CIL) and S106 funding for infrastructure.	Lydiard Millicent Parish Council; Royal Wootton Bassett Town Council; Individuals x10.
<b>Landscape Impact:</b> Detrimental to the 'green gap' between RWB and Swindon. Site is suggested as being unsuitable on landscape and coalescence grounds, with sites to the south of RWB (Thunderbrook Estate) scoring better in these regards.	Cllr S Bucknell; Lydiard Millicent Parish Council; Cllr A Bucknell.
<b>Location:</b> Suggested that employment areas are not easily accessed on cycle or foot from this location, suggested to site developments closer to principle employment areas, for example to the south of RWB.	Cllr A Bucknell; Lydiard Millicent Parish Council.
<b>Site Allocation:</b> Site selection methodology is flawed.	Cllr S Bucknell.
<b>Site Specific Constraints</b>	
<b>Drainage:</b> No evidence to show drainage issues evidenced by recent flood events (Storm Babet and Ciaran) have been considered.	Individuals x10.
<b>Ecological Impact:</b> Recommended to set out current area of green infrastructure delivery as a minimum requirement in policy wording. Suggested that improvement of the canal can add additional green and blue space and provide active travel.	Natural England; Wiltshire Swindon & Oxford Canal Partnership.
<b>Utilities:</b> Failure to consider foul water disposal or water supply capacity in the locality. Upgrades to water supply likely required due to size of allocations.	Lydiard Millicent Parish Council; Royal Wootton Bassett Town Council; Thames Water.
<b>Heritage:</b> Scheduled monument to west of site should be taken into consideration.	David Wilson Homes.
<b>Amenity:</b> Noise assessment should inform proposals.	David Wilson Homes.

Key issues raised (Policy 51 - Land at Woodshaw, Royal Wootton Bassett)	Respondent (s)
<b>Transport</b>	
<b>Traffic Generation:</b> Suggested that this allocation and others will exacerbate traffic issues on the surrounding road network (namely A3102, B4042 and M4 Junction 16), conflicting with Policy 47(4) and leading to increased use of minor roads to the north through small settlements as 'rat runs'. Suggested that traffic evidence used is out of date and traffic issues are not fully assessed.	Cllr S Bucknell; Cllr A Bucknell; Lydiard Millicent Parish Council; Royal Wootton Bassett Town Council; Individuals x10.
<b>Sustainable Transport:</b> Sustainable transport options not sufficient in this location to allow people to access local services, leading to increased car use and traffic. Unclear how improvements to local sustainable transport infrastructure will be delivered and no evidence that opportunities to maximise public transport are being taken advantage of as per NPPF requirements. Intricate road designs cause issues for public transport delivery.	Cllr A Bucknell; Lydiard Millicent Parish Council; Royal Wootton Bassett Town Council; Go South Coast Ltd; Individuals x10.
<b>Policy Wording</b>	
<b>Criteria:</b> Criteria relating to transport and active travel are unclear and repetitive.	David Wilson Homes.
<b>Consultation</b>	
<b>Engagement:</b> Website confusing to use.	Individuals x10.

## Local Plan section 4: Strategy for the Trowbridge HMA

**5.27** Please see below the key issues tables listing the key issues raised for the parts of the plan within section 4: Strategy for the Trowbridge HMA, namely:

- Strategy for Trowbridge Housing Market Area
- Policy 52: Trowbridge Principal Settlement
- Policy 53: Land NE of Hilperton
- Policy 54: North Trowbridge Country Park
- Policy 55: Land at Innox Mills
- Policy 56: Trowbridge Central Area
- Policy 57: Bradford on Avon Market Town
- Policy 58: Warminster Market Town
- Policy 59: Land at Brook Street
- Policy 60: Westbury Market Town
- Policy 61: Land West of Mane Way
- Policy 62: Land at Bratton Road
- Policy 63: Westbury County Park

Table 5.65 [Strategy for Trowbridge] key issues

Key issues raised (Strategy for Trowbridge)	Respondent(s)
<b>Green Belt Support</b>	
<p><b>Welcome the approach to preserving the integrity of the West Wilts Green Belt:</b> The Green Belt serves an important function to check the expansions of towns and safeguards surrounding countryside and settings of villages, and prevent the coalescence of Bradford on Avon with Trowbridge.</p>	Elected Member x1.
<p><b>Support the continued commitment to protecting the Green Belt and the use of suitable brownfield sites instead:</b> Oppose Trowbridge Town Council's suggestion that Wiltshire Council review the Green Belt to the North and West of Trowbridge.</p>	Wingfield Parish Council.
<b>Trowbridge HMA Introduction</b>	
<p><b>Paragraph 4.272, 4.273 and 4.276 HMA section is confusing in its poor use of geographic terminology and lacking in a full explanation of the reasons for choosing less sustainable locations around Trowbridge:</b> Use clear and correct geographic language which will avoid confusion in future (Amendments suggested).</p>	Trowbridge Town Council.
<b>Housing Growth in the Rural Area</b>	
<p><b>Amend the distribution of the Trowbridge HMA Housing Growth to introduce a higher proportion of housing in the Rural Area category:</b> Given the current proportionate split of 28% between the population of the Rural Area and the 4 main settlements, an increase to 1300 dwellings (or approx. 15% of housing to be allocated) would seem appropriate and would allow for the positive planning for future housing, particularly addressing those in affordable housing need. Trowbridge itself, where land has not delivered housing at a rate previously assumed.</p>	Wellbreck Strategic Land LLP.
<p><b>Increase the level of housing growth proposed in the Rest of the Trowbridge HMA:</b> Distribute the additional housing to relatively unconstrained Local Service Centres and Large Villages, including Steeple Ashton.</p>	Newland Homes.
<p><b>Object to Table 4.16 distribution of growth:</b> The plan rolls forward existing allocations including Ashton Park which have been the cause of the housing land supply issues. The strategy moving forward should be deliverable. Semington is well placed to provide deliverable sites or provide contingency should Trowbridge fail to deliver.</p>	Wain Estates Ltd.
<p><b>Increase the overall housing requirement for Wiltshire and the Rest of the Trowbridge Housing Market Area (HMA):</b> The overall housing requirement is too low and the housing requirement for the Rest of the Trowbridge Housing Market Area (HMA) is too low despite there being nothing in the Sustainability Appraisal to justify this.</p>	Newland Homes.



Key issues raised (Strategy for Trowbridge)	Respondent(s)
<p><b>Plan positively by identifying land in the large villages in this Plan:</b> Villages such as Dilton Marsh which is not constrained by NHS capacity or nutrient management constraints.</p>	Roscoon Strategic Land.
<p><b>Warminster</b></p>	
<p><b>Table 4.14, Policy 58 and Paragraph 4.312 are contradictory for Warminster:</b> Table 4.14 has a residual figure of 40 units for Warminster. However, Policy 58 and paragraph 4.312 say the Neighbourhood Plan should accommodate 90 dwellings.</p>	Cranborne Chase Area of Outstanding Natural Beauty.
<p><b>Westbury</b></p>	
<p><b>Provide additional planned growth:</b> Acknowledge the sustainability of the location and optimising the opportunity to secure further sustainable development to help meet needs and reflect demand e.g. Westbury. Update Table 4.14 Westbury to 671 new homes and provide further housing land. There is demand for housing in Westbury beyond that anticipated.</p>	Gleeson Land.
<p><b>Increased pressure on the AONB:</b> e.g. Westbury</p>	Cranborne Chase Area of Outstanding Natural Beauty.
<p><b>Supports the spatial strategy, but has some concerns regarding the site selection process used to determine where this growth will be delivered:</b> The number of homes for Westbury has decreased with no justification provided.</p>	Gladman.
<p><b>Trowbridge</b></p>	
<p><b>There is a degree of logic for Trowbridge to be the focus for growth within the HMA, but there is an overreliance on it and a reliance on large site allocations yet to be approved:</b> There should instead be a greater degree of dispersal within the HMA.</p>	Wainhomes.
<p><b>The draft Plan is too weighted towards large scale complex sites adjacent to principal settlements and should have a more decentralised strategy to meet the growth requirement:</b> More development should be distributed to market towns and rural areas to enable the SME sector to play a greater role in housing delivery and ensure an even supply of new housing over the plan period.</p>	Assetsphere Ltd.
<p><b>Specify whether and how housing growth should be phased within each HMA:</b> rather than dealing with the whole of Wiltshire in an identical fashion, particularly when the reason for proposing a lower rate of growth earlier in the plan period only appears to relate to the Salisbury HMA.</p>	Newland Homes.

Key issues raised (Strategy for Trowbridge)	Respondent(s)
<p><b>Omission sites:</b></p> <ul style="list-style-type: none"> <li>• Land at Edington Road, Steeple Ashton.</li> <li>• Land to the north of Shallow Wagon Lane, Westbury.</li> <li>• Land North of Clivey, Dilton Marsh.</li> <li>• Land off Storridge Road, Westbury.</li> <li>• Land off Blind Lane, Southwick.</li> <li>• Land at Madbrook Farm, Westbury</li> <li>• Land at Frogmore Lane, Westbury</li> <li>• Land Adj 100 Frome Road, Southwick</li> </ul>	<p>Newland Homes; Assetsphere Ltd; L&amp;Q Estates; Gladman; Roscoon Strategic Land; Wainhomes.</p>

Table 5.66 [Policy 52 - Trowbridge Principal Settlement] key issues

Key issues raised (Policy 52 - Trowbridge Principal Settlement)	Respondent(s)
<b>Settlement Hierarchy</b>	
<b>Trowbridge should not be considered a 'Principal Settlement':</b> This is due to lack of transport links, retail / infrastructure provision.	Individuals x10.
<b>Location of development outside Trowbridge:</b> Development is within the Large Village of Hilperton	Individuals x10.
<b>Paragraph 6:</b> The wording of Paragraph 6 is ambiguous - it should be made clearer that there is a need to respect individual identities of Large Villages / the wording included in the Wiltshire Core Strategy on this topic should be used instead.	Individuals x10.
<b>Identity of Settlements:</b> Requests that, where this policy refers to respecting the identity of individual villages; rather than specifying West Ashton the policy be rephrased to say 'villages southeast and east of the A350'	Steeple Ashton Parish Council.
<b>Separation of Southwick and Trowbridge:</b> Separate identity of Southwick and other outlying villages near to Trowbridge	Southwick Parish Council; North Bradley Parish Council.
<b>Amendments to policy wording:</b> The terms 'wherever possible' and 'as far as is reasonably practicable' are not clearly written and ignore the clear and evidenced vision of local communities to manage growth in a manner that is positively prepared, justified and effective.	Southwick Parish Council; North Bradley Parish Council.
<b>Maintaining nearby settlement gaps:</b> Adjoining settlements to Trowbridge have neighbourhood plans that identify landscape gap settings performing vital roles to avoid harmful coalescence, GBI and bat mitigation	Southwick Parish Council; North Bradley Parish Council.
<b>Neighbourhood Planning</b>	
<b>CBA Landscape Report:</b> Does not have any regard to the four made Neighbourhood Plan policies concerning landscape setting and their multi-functional benefits.	Southwick Parish Council; North Bradley Parish Council.
<b>Lack of cohesion with 'made' Neighbourhood Plans:</b> Neighbourhood Plans have not been taken into any consideration when developing an appropriate strategy, which currently proposes significant urban extensions that could consume outlying settlements	Southwick Parish Council; North Bradley Parish Council.
<b>Sustainability Appraisal:</b> The SA, Annex 1.4 and Annex 2.13 do not have any regard for the vision, objectives and policies of the made neighbourhood plans for villages surrounding the Principal Settlement of Trowbridge.	Southwick Parish Council; North Bradley Parish Council.

Key issues raised (Policy 52 - Trowbridge Principal Settlement)	Respondent(s)
<b>Strategic Countryside Gaps:</b> Newly recommended 'Strategic Countryside Gaps' are proposed to the south and northeast of Trowbridge do not achieve policy aims and gaps should be between Trowbridge and the surrounding villages and not further afield.	Southwick Parish Council; North Bradley Parish Council.
<b>Constraints</b>	
<b>Flooding:</b> Environment Agency is undertaking new flood modelling which may change the extent of flood zones on the planned growth sites	Environment Agency.
<b>Infrastructure: No</b> mention of additional infrastructure	Individuals x10.
<b>Transport:</b> Inadequate bridge at Staverton to deal with increased demands locally and growth at the town	Staverton Parish Council.
<b>Other</b>	
Negative impact on wildlife	Individuals x10.
Inadequate building standards	Individuals x10.

Table 5.67 [Policy 53 - Land at Hilperton, Trowbridge] key issues

Key issues raised (Policy 53 - Land North East of Hilperton, Trowbridge)	Respondent(s)
<b>Support</b>	
<b>Supportive of Overall Allocation Policy:</b> Barwood Land are generally supportive of the principle of this allocation. The overall density within the concept plan of 35dph is appropriate and is therefore supported.	Ridge (Barwood).
<b>Concerns with connectivity to existing development:</b> Supportive of the allocation, as per policy 53. In fact, within the current pending application for the site (ref: 2022/07977), it does allow for future connectivity to the north to accommodate up to 600 homes, despite it originally being submitted as a standalone application.	Redcliffe (Y Whittaker); Redcliffe (S Davis).
<b>Relationship with Trowbridge Country Park:</b> Wholly welcome plans for the North Trowbridge Country Park and urge the “consideration” that the country park is implemented before any development starts should be made a condition.	Keevil Parish Council.
<b>Consultation</b>	
<b>Lack of direct consultation:</b> Failure to consult correctly on the Local Plan.	Individuals x20.
<b>Limited Consultation:</b> There has been limited consultation with additional sites added in since the Regulation 18 stage closed without adequate consultation.	Individuals x10.
<b>Lack of Community Engagement:</b> There was a lack of community engagement. Unconscious bias shown by the Council has excluded a large proportion of the elderly population in Hilperton, who do not have computer skills and some do not have a computer to even download the form to comment. The form itself is also very difficult to navigate. Consultation therefore has been severely lacking.	Individuals x10..
<b>Lack of consultation with Parish Councils:</b> The Council have refused to let us have any details or to discuss the plan with us prior to its publication in September 2023.	Hilperton Parish Council with Hilperton Area Action Group.
<b>Neighbourhood Plan:</b> Disregard for the Hilperton Local Neighbourhood Plan, the settlement boundary, the landscape policy in the neighbourhood plan and surrounding neighbourhood plans.	Individuals x10..
<b>Settlement hierarchy:</b> The plan fails to recognise Hilperton, which is identified as a large village, in rural development documents.	Individuals x20; Hilperton Parish Council with Hilperton Area Action Group.
<b>Settlement hierarchy:</b> Development is not designed to meet the needs of the village but that of Trowbridge, the principal settlement.	Individual x10.

Key issues raised (Policy 53 - Land North East of Hilperton, Trowbridge)	Respondent(s)
<b>Site area:</b> The allocation is extended to incorporate additional land to the southwest as it has been demonstrated by way of the pre-application submission referred to above that this land could provide additional residential dwellings without having an adverse impact on designated Heritage Assets.	Ridge (Barwood).
<b>Housing number:</b> The number of dwellings should be expressed as a 'minimum'.	Ridge (Barwood).
<b>Heritage</b>	
<b>Heritage:</b> Has an explicit HIA been undertaken and available to consider? on what basis has a view been taken that development can avoid harm to the CA? What expertise has informed the planning judgement? SA considers there can be adequate mitigation to minimise harm. It would be reassuring to appreciate the local authority's conservation officer view on whether this is the case. It will be important to be able to demonstrate how the Council have addressed NPPF para 195.	Historic England.
<b>Heritage:</b> The proposed site is also close to the Conservation Area and a cluster of listed buildings which will require sensitive design including sufficient buffers.	Barratt (Maxcroft Farm).
<b>Heritage:</b> Whaddon Lane is a medieval Road and with the Church 12th Century and the packhorse bridge being over 300 years old and does not state what they are or if they would be in keeping with the character. Impact on Whaddon Lane through greater pressure from traffic and people.	Individual x10.
<b>Heritage:</b> The area North East of Hilperton needs the same protection as afforded to special areas of conservation in the rest of Wiltshire. Unspecified improvements to Whaddon Lane could add to the loss of character and harm setting of conservation area (noted recent Appraisal of the Hilperton Conservation Area).	Hilperton Parish Council with Hilperton Area Action Group.
<b>Heritage:</b> The proposed housing plan extends to the fields bordering the Village Hall Playing Field (shown in Figure 4.38) and allotments - this will result in the views from the north-east side of The Old Rectory being obscured, impacting the character of the designated conservation area and The Old Rectory itself.	Individuals x10.
<b>Heritage:</b> Hilperton is a large village with its own heritage, two conservation areas. Impact on Conservation Area and Heritage of Hilperton and surrounding on historic fields and setting of conservation area and decline in Rural Landscape and impact on historic landscape encompassing historic buildings and natural environments.	Individuals x10.
<b>Ecology</b>	

Key issues raised (Policy 53 - Land North East of Hilperton, Trowbridge)	Respondent(s)
<p><b>Possible interference with bat commuting corridors:</b> Welcome reference to the Trowbridge Bat Mitigation Strategy (TBMS) within Policy 53. However, the allocation lies on a known bat commuting corridor with limited alternative commuting routes around the site. Natural England advises that the proposed 50m ecological corridors on the east and through the development as shown on the concept plan are critical to the allocation and should be identified as minimum requirements within the Policy 53</p>	Natural England.
<p><b>Need for minimum green infrastructure requirements:</b> Supports the inclusion of 14 hectares of green infrastructure within the concept plan but recommends this is set out in the policy as a minimum area requirement for the scheme.</p>	Natural England.
<p><b>Impacts to Wildlife:</b> Negative impact on wildlife and countryside.</p>	Individuals x10; Hilperton Parish Council with Hilperton Area Action Group.
<p><b>Retain existing hedge line at Whaddon Lane:</b> Suggested that the existing hedge line along Whaddon Lane is retained and widened, to maintain the rural character of the lane and to enhance wildlife habitat.</p>	Individuals x10.
<p><b>Accessibility concerns with proposed Country Park:</b> The new proposed country park is not easily accessible to people living in the village and would not be safe for children to travel to alone, so does not substitute for the loss of habitat and recreational space that the development would destroy.</p>	Individuals x10.
<p><b>Offsite Mitigation:</b> Offsite delivery and credits where no suitable alternatives exist. These are clearly inappropriate for Site 53 which is an important wildlife corridor for the internationally recognised protected bat species.</p>	Hilperton Parish Council with Hilperton Area Action Group.
<p><b>Concern with potential impacts to Bats:</b> Developments is in the yellow zone of the Bat Mitigation Strategy. Developers often use bat boxes which overheat. The local plan is unsound as the population is protected.</p>	Individuals x10.
<p><b>Minimum 20% Biodiversity Net Gain:</b> Development must achieve a minimum of 20% biodiversity net gain - where delivered on site habitats should be functionally linked to the wider habitat network creating coherent ecological networks.</p>	Hilperton Parish Council with Hilperton Area Action Group.
<p><b>Coalescence of settlements:</b> Objection to Policy 53 due to coalescence with Semington, flora and fauna, recreational green-space, little to no infrastructure (no employment, poor transport links and proximity to school and shop) and impact on Staverton Bridge.</p>	Individuals x10.
<p><b>Impacts to SAC:</b> North East Hilperton is located far closer to the SAC and would be more reliant on strategic SANG mitigation to address the recreational pressures from nearby residents. The draft Plan has therefore located development which is far more likely to have a direct impact on the SAC (as it did with Ashton Park in 2015) compared to other reasonable alternatives.</p>	Barratt (Maxcroft Farm).

Key issues raised (Policy 53 - Land North East of Hilperton, Trowbridge)	Respondent(s)
<p><b>Availability of Country Park prior to occupation of new proposed developments:</b> North Trowbridge Country Park (c.65ha) will need to be available in full to act as SANG prior to any occupations at North East Hilperton. The anticipated cost for the new Country Park is not clarified in the Wiltshire Infrastructure Delivery Plan (IDP) but will be significant. The IDP states that SANG is to be “provided by contributions proposed strategic allocations in the north of Trowbridge”. This clearly raises viability challenges for the allocation in isolation and will significantly delay site delivery meaning that smaller scale housing options are critical to ensure a continuous housing supply.</p>	Barratt (Maxcroft Farm).
<p><b>Lack of detail within Viability Assessment:</b> The Viability Assessment supporting the draft Plan does not include specific costs for the allocation’s delivery including many generalised statements and states that significant additional items of infrastructure with unknown costs can be absorbed within the viability’s headroom. This is very vague and lacks detail. In particular, the cost for delivery of the new Country Park is stated as unknown. The appraisal states that there “may be an adequate headroom for paying towards other infrastructure requirements, including SANGS” which raises major uncertainty on delivery.</p>	Barratt (Maxcroft Farm).
<p><b>Unclear how nature park will be secured:</b> The nature park is not included as part of the proposal, and this is on the other side of a busy road and is likely never to be built.</p>	Individuals x10.
<p><b>Lack of cohesion with Trowbridge Bat Mitigation Strategy:</b> The whole site is in the Yellow Zone of the Trowbridge Bat Mitigation Strategy. There is no dark buffer zone proposed in the Local Plan for the area bordering Whaddon Lane so the Plan is already in contravention of the TBMS calling into question whether it is sound. Mitigation outside the area would not protect these bats.</p>	Hilperton Parish Council with Hilperton Area Action Group.
<p><b>SANG provision:</b> Current policy (53) is ambitious in terms of the quantum of homes that it is seeking to deliver with associated social, community and green infrastructure, from the site area identified. In the light of LS’ comments in response to Policy 54 below, it will be necessary to make alternative provision for Suitable Alternative Natural Greenspace, which may necessitate incorporating additional land within the allocation. The following amendments to the policy wording are proposed:</p>	Lightwood.
<p><b>Landscape</b></p>	
<p><b>Priority should be given to Brownfield sites:</b> Brownfield first approach should be applied.</p>	Individuals x10.
<p><b>Amendment to policy wording:</b> The statement 'as far as reasonably practicable' is too wide , and is open to ambiguous interpretation</p>	Individuals x10.
<p><b>Rural landscape impacts:</b> Impact on village landscape views across the Wiltshire countryside to Roundway Down Iron Age Hill Fort.</p>	Individuals x10.



Key issues raised (Policy 53 - Land North East of Hilperton, Trowbridge)	Respondent(s)
<p><b>Loss of usable farmland:</b> Farming is an essential part of the landscape that has evolved, with the grazing sheep and cattle providing the nutrients, such as dung larvae for the bats. The farmers are all planning to leave as it is not viable for them to stay or they have received such a handsome offer from developers that they cannot refuse. This landscape that has evolved from the interaction between nature and humans will be destroyed for ever.</p>	Hilperton Area Action Group.
<p><b>Impacts to local identity of Hilperton:</b> As mentioned elsewhere the identity of Hilperton is going to be severely affected and will erode its separate identity and destroy the rural character of the area.</p>	Hilperton Area Action Group; Individuals x10.
<p><b>Level of protection to non-designated landscapes:</b> Pressure on the council to protect AONBs but we also consider that areas outside of the AONB are also important. The same landscape to the West of Trowbridge which is protected extends to the sites 4 and 5 which are proposed for substantial growth; both are part of the Avon Vale corridor that includes the River Avon and the Kennet and Avon Canal.</p>	Hilperton Area Action Group.
<p><b>Impacts on boating community:</b> Respect the interests of the boatowners who have the benefits of a quiet rural setting in which to live and should the possible future plans for more development take place they will be surrounded by housing.</p>	Hilperton Parish Council with Hilperton Area Action Group.
<p><b>Potentially overlooking temporary mooring boaters:</b> There is a danger that temporary moorings will be overlooked in the desire to develop this area.</p>	Hilperton Parish Council with Hilperton Area Action Group.
<p><b>Lack of protection of non-designated local landscapes:</b> The landscape has evolved over hundreds of years and the lanes and hedgerows and field systems reflect this. It is perceived by locals, visitors and tourists as an important landscape, but because it is small and is not recognised as an AONB or Green Belt is being ignored by this Local Plan.</p>	Hilperton Area Action Group.
<p><b>Policy 53 does not align with Policy 91:</b> Policy 53 is at odds with Policy 91 and applaud Policy 91 which reflects the values and aspirations that we are trying to protect in the site Policy 53.</p>	Hilperton Area Action Group.
<p><b>Concern with phasing of the allocation:</b> Referring to this allocation as Phase 1 carries an implication that there will ultimately be a return to earlier iterations of the plan that proposed large-scale development.</p>	Individuals x10.
<p><b>Concern with Hilperton being identified as a 'broad location for growth':</b> Concern that Hilperton has been identified as one of the three 'broad locations for growth' in the county despite proximity to Staverton on the B3105. Neither Hilperton nor Trowbridge are identified on the Strategic Transport Route Map of Wiltshire. (Delivery Strategy Fig 3.2).</p>	Individuals x10.

Key issues raised (Policy 53 - Land North East of Hilperton, Trowbridge)	Respondent(s)
<b>Landscape Sensitivity should be considered:</b> The site is sensitive and should be considered worthy of conservation on many levels. Landscape effects with exposed views from the north which would be difficult to mitigate and seen as a prominent urban encroachment into the countryside.	Individuals x10.
<b>Coalescence:</b> Coalescence of Hilperton and loss of village identity.	Individuals x20.
<b>Coalescence:</b> Suggested that the wording for the current policy (policy 52, point) lacks clarity compared to the wording of the current Core Strategy.	Individuals x10.
<b>Site boundary:</b> It is considered that the proposed allocation should be extended to incorporate additional land to the southwest of the site as a logical extension to the allocation bringing it closer to the existing built form of Hilperton (but still respecting its setting) and making more efficient use of the land available for development as well.	Ridge (Barwood).
<b>Concept plan:</b> The concept plan includes some very tight relationships between development edges and landscape/attenuation ponds and is likely to have over inflated the site's capacity.	Barratt (Maxcroft Farm).
<b>Concept plan:</b> The concept plan of 600 houses focusses on maximising density and is not conducive to enhancing the area.	Individuals x10.
<b>Concept plan:</b> The field bordering the allotments and proposed primary school area is marked on Figure 4.38 as 'open space not currently in redline' - we consider this to be ambiguous wording and request that this field to be excluded from the plans permanently on heritage and landscape grounds and preserve the historic part of the village being further encroached upon by new developments.	Individuals x10.
<b>Concept plan:</b> The Plan must be explicitly clear that the plan is exactly that 'a concept' and that alternative layouts may come forward as part of a future planning application on the site. Amendment suggested to the concept plan demonstrating how development can be accommodated on the land controlled by Barwood Land without prejudicing development of the wider allocation.	Ridge (Barwood).
<b>Concept Plan:</b> The 50 metre Woodland Buffer is not justified by reference to the TBMS SPD in association with a development for 600 dwellings. It is therefore unclear why such an extensive area has been identified on the Concept Plan and why adopted TBMS design guidance is not being applied.	Lightwood.
<b>Concept Plan:</b> The inclusion of concept plan causes ambiguity. The concept plan should therefore be removed or redrawn in a simpler form or alternative wording added to the policy to make it very clear that the concept plan carries no weight in a future masterplan.	Landowner - Y Whittaker; Landowner - S Davis.

Key issues raised (Policy 53 - Land North East of Hilperton, Trowbridge)	Respondent(s)
<b>Master plan:</b> Recommended that the policy is updated to remove the requirement for a single comprehensive masterplan, this is because to date, the delivery of the draft allocation is already underway.	Ridge (Barwood).
<b>Master plan:</b> The requirement for a full and comprehensive masterplan for the entire allocation prior to any parts or phases coming forward would seriously hamper the deliverability of housing. There are numerous landownerships within the allocation. Whilst they all support the allocation in principle, agreeing to a masterplan will significantly delay even a small site such as this coming which is supported, however the policy wording insists that this shall be made available prior to the occupation of the allocation. It is not clear if this is first occupation or last. Assuming its first, this is a significant expense up front before any developer has sold any houses.	Landowner - Y Whittaker; Landowner - S Davis.
<b>Directions of growth should be made clear and alternatives should be considered:</b> North East Hilperton is clearly phase 1 of the much wider Site 5 and the Council's intended broad location for growth though the Draft Plan is quiet on the longer term direction of travel. It is imperative that such a strategic site and it supporting physical and community infrastructure is assessed in the round through the Draft Plan and tested against other reasonable alternatives.	Maxcroft Farm; Barratt.
<b>Policy 53 should seek to preserve historic, landscape, and ecological designations:</b> The landscape of the site of Policy 53 is special and ecologically sensitive with historical and natural features that need preserving.	Hilperton Parish Council with Hilperton Area Action Group.
<b>Transport</b>	
<b>Lack of consideration of traffic issues:</b> There is little regards for the existing traffic management issues in the area.	Individuals x10.
<b>Increased traffic and road safety concerns:</b> Traffic impact on network will increase, potential to levels before the bypass and Access onto Devizes Road will make the Roundabout even more dangerous.	Individuals x10.
<b>B3105:</b> No highway improvements are planned for the B3105 which is ridiculous considering the amount of traffic and delays already encountered on this road.	Individuals x10.
<b>Unsustainable Development:</b> The plan does not take account of sustainable development due to loss of visual amenity, transport, ecology, loss of beautiful greenfield sites and thoughtless planning of transport links to the development along the narrow and already overloaded Whaddon Lane areas.	Individuals x10.
<b>Site access:</b> The suggested single main exit onto the A361 would require the re-building / re-siting of the roundabout and would create intolerable pressure on an already busy primary route with years of construction traffic sharing the single entrance. It is an existing planning application (PL/2022/07977) and has not been considered in the context of the Local Plan. There is no up-to-date Transport or Freight Management plan.	Individuals x10.

Key issues raised (Policy 53 - Land North East of Hilperton, Trowbridge)	Respondent(s)
<p><b>Site access:</b> The allocation would be served by a single point of access to a stretch of road that is regularly congested, Whaddon Lane of local importance.</p>	<p>Hilperton Parish Council with Hilperton Area Action Group.</p>
<p><b>Site access:</b> Development should be accessed from the A361 only. No vehicle access onto Whaddon Lane from the new development.</p>	<p>Individuals x10.</p>
<p><b>Site access:</b> Barwood Land demonstrated that Devizes Road was suitable for a primary access with a secondary access from Whaddon Lane. Policy should be amended to suggest that the primary vehicular access should be from the A361, with additional accesses to be provided if it can be demonstrated that these are safe and suitable. The wording within the policy should be amended to allow for alternative satisfactory vehicular accesses to be provided.</p>	<p>Barwood - Ridge.</p>
<p><b>Site access:</b> Aware that the future access for the wider allocation is reliant on the land, as well as land to the south. For this reason, it's important for the deliverability of the allocation as a whole that the detail and evidence for the allocation and concept plan is fully investigated and scrutinised to ensure that the access can be facilitated in a quick and efficient manner.</p>	<p>Landowner - Y Whittaker.</p>
<p><b>Site access:</b> The access strategy has changed between draft plans. The consultation plan shows a loop road within the site with no connection to the boundary. It is unclear why the access strategy has changed between the Cabinet meeting and publication of the Regulation 19 Plan for consultation purposes, and who was responsible for instigating that change. It is also unclear whether this change has taken into account that Trowbridge is a broad location for growth, and the Council's own evidence base documents confirm that land to the north of Trowbridge is unconstrained compared with other locations around the town. The effect of the change to the concept plan would be to reduce vehicular movement options to/from other parts of a broad location / a wider allocation. This is not the advice of Create Streets in its Vision document for Great Whaddon. It can also be observed that the key for the Concept Plan that was agreed at the July Council meeting refers to 'Phase 1'. A change should be sought to provide for larger scale development north-east of Hilperton to be planned on a comprehensive basis incorporating the delivery of substantial new community and green infrastructure, to be phased beyond the current plan period and increase the allocation to circa 3,000 homes in accordance with LS' vision document for Great Whaddon.</p>	<p>Lightwood.</p>
<p><b>Benefits to existing road infrastructure:</b> Development would contribute to the infrastructure of the town, journey time reliability, lower emissions (through less stop-start traffic), and easier access to areas outside the town's environs.</p>	<p>Individuals x10.</p>

Key issues raised (Policy 53 - Land North East of Hilperton, Trowbridge)	Respondent(s)
A new and improved route, joining the A363 to the B3105, bypassing Staverton to the north and joining the King's Arms roundabout to a new route which skirted north of Hilperton, but joined to the A361 and maybe even the A350 would relieve Trowbridge, and create many new areas for development to the north north-east of Trowbridge.	Individuals x10.
<b>Public transport:</b> There is limited public transport in the area.	Individuals x10.
<b>Distance from local facilities:</b> Proximity to town centre, railway the station & facilities is not sustainable.	Individuals x10.
<b>Increased traffic:</b> The location of the housing site would require people to access services via private car and impact on already congested roads.	Individuals x10.
<b>Staverton bridge:</b> The plan makes no provision for highway improvements to circumvent the existing narrow road at Staverton or the bottleneck medieval bridge crossing of the river Avon, and its extensive floodplain. Further constraints in the layout of the B3105 highway network compound congestion through acting as a physical obstacle to efficient traffic flow.	Hilperton Parish Council with Hilperton Area Action Group.
<b>Staverton bridge:</b> The surrounding roads are at capacity and local road infrastructure cannot cope with any further development of this area including the Staverton bridge on B3105 which has been over capacity for many years which is prone to flooding.	Individuals x10.
<b>Kennet and Avon canal:</b> Reference to good links to footpaths and to the Kennet and Avon Canal is not correct as narrow paths which are unsuitable for/provide limited opportunity for cycle use.	Individuals x10.
<b>Kennet and Avon canal:</b> Agree with the statement that the Kennet and Avon Canal is a significant asset within Wiltshire's sustainable transport and green and blue infrastructure network and Policy 53 may create significant pressure on the canal. The canal towpath (an extremely important wildlife corridor) east of Hilperton is very narrow making the passing or overtaking of two mounted bicycles impossible and increased use of the towpath would in any case add to existing conflict with moored narrow boats and fishermen. The routes to access the canal in the Hilperton area are narrow roads or tracks and would not be able to cope with excessive levels of traffic. The canal towpath east of Hilperton is very narrow making the passing or overtaking of two mounted bicycles impossible. Increased use of the towpath would in any case add to existing conflict with moored narrow boats and fishermen.	Hilperton Parish Council with Hilperton Area Action Group.
<b>Increased traffic in Hilperton:</b> The location of the draft allocation will draw traffic further into the heart of Hilperton Village leading to greater congestion compared to other options to the west such as Maxcroft Farm which can assist to route traffic away from the heart of the village and safeguard local character.	Barratt (Maxcroft Farm).

Key issues raised (Policy 53 - Land North East of Hilperton, Trowbridge)	Respondent(s)
<b>Drainage:</b> There are a number of issues in relation to drainage that may affect the development of the land North East of Hilperton including the high water table and consequential risk of groundwater and surface water flooding to existing properties and parts of Whaddon Lane already flood after heavy rain, and this would be exacerbated if runoff is allowed from the development.	Individuals x10.
<b>Drainage:</b> Drainage systems in Hilperton use culverts some of which have been built over and some are open. There needs to be a comprehensive drainage and flooding assessment before this plan is approved. The flood risk for the area should be increased to reflect this to amber.	Hilperton Parish Council with Hilperton Area Action Group.
<b>Flooding:</b> Wiltshire Council's Flood Risk maps it can be seen that although the 'Phase 1' proposal of 600 homes is subject to relatively low levels of Surface and Ground Water flood risk the run off generated from the introduction of large areas of impermeable ground coverings will simply overwhelm the existing drainage systems and attenuation provided by the land in area 5 much of which is in the highest risk category for Ground and Surface Water Flooding putting the residents and properties of the existing settlements at greater risk still.	Individuals x10.
<b>Increased rapid surface runoff:</b> The increase in rapid run off from this development will add to massively increased pressure on the Avon Basin. Other developments proposed in Trowbridge & upstream in the Avon Basin at Melksham, Chippenham & Malmsbury, will ensure that Bradford on Avon will have little or no chance of escaping serious flooding, unless some serious infrastructure is considered to control river levels in the event of stormwater rapidly swamping the whole Basin, climate change will ensure this becomes an urgent reality.	Individuals x10.
<b>Will increase flood risk elsewhere:</b> The area is directly above & will naturally drain straight off into an area further down the village designated as Flood Zone 3.	Individuals x10.
<b>Reservoirs:</b> Reservoirs 1 & 2 are on the site which may also impact on the availability of land and the need to protect the access and pipelines.	Hilperton Parish Council with Hilperton Area Action Group.
<b>Climate change:</b> At its northern boundary along Whaddon Lane there would be significant difficulties to mitigate which may be unacceptable given that the allocation of the initial 600 houses and would likely be impossible to meet the green sustainable zero carbon ambitions therefore cannot be sustainably mitigated for.	Individuals x10.
<b>Infrastructure</b>	
<b>Lack of existing infrastructure:</b> The proposed site is remote and there is a lack of employment sites, health provision and secondary schools and result in an increase in road traffic.	Individuals x10; Hilperton Parish Council with Hilperton Area Action Group.
<b>Impacts to existing sewerage capacity:</b> There will be an impact of sewage capacity which will threaten river health, levels of pollution nitrates & phosphates will rise exponentially, infrastructure to control & address this is currently missing.	Individuals x10.

Key issues raised (Policy 53 - Land North East of Hilperton, Trowbridge)	Respondent(s)
<b>Query regarding school infrastructure thresholds:</b> Question how only 600 units requires a new school.	Individuals x10.
<b>Need for comprehensive West Wilts masterplan:</b> There should be a proper West Wiltshire masterplan which provides for 5, 10, 20, 50 and 100 years given the time taken to provide infrastructure.	Individuals x10.
<b>Impacts to nature of village:</b> The associated noise, light and air pollution of an urban development would change the nature of the village, which is a designated Conservation Area, and destroy the eco-systems which wildlife depend upon.	Individuals x10.
<b>Education contributions:</b> LEA appear to be basing the requirements on the recently published School Places Strategy (2023-2027) which specifically references the future housing requirements of the previous draft (and much larger) allocation in Trowbridge under the Regulation 18 Plan and consider that more robust evidence is required to justify any requests for new educational facilities or contributions in Trowbridge and would welcome the ability to discuss future education needs with officers ahead of the plan's submission. The policy should be made more flexible to allow for due contributions towards existing school and nursery provision rather than on-site provision, should it be demonstrated that there is no specific need for new educational facilities to be delivered on site. Indeed, such a change is considered to be reasonable given the lack of evidence to justify their requirement and deliverability.	Ridge (Barwood).
<b>Convenience store:</b> The policy also outlines a requirement for a convenience store. There is not considered to be any evidence to justify such a facility being necessary or deliverable. The location of such a facility away from the main road would also significantly undermine its viability. It is requested that additional flexibility be added into the policy in terms of the requirements for the school, nursery and retail facilities having regard to current need.	Ridge (Barwood).
<b>Care Home:</b> Barwood Land have also identified a requirement for a care home. The provision of a care home will add to the mix of housing encouraged by national planning policy.	Ridge (Barwood).
<b>Care Home:</b> Recommended that the policy include the requirement for a care home to support a mix of housing on the site and a diversified group of people with specific needs.	Ridge (Barwood).
<b>Impact on local wildlife management:</b> The proposed 3000+ houses is on marshland and development will have an effect on wildlife and local water management, will lead to more flooding of the river and downstream to Bradford-on-Avon.	Individuals x10.
<b>Distribution/scale of growth</b>	
<b>Only 1 phase identified:</b> Policy 53 identified as only phase one of a much larger allocation of housing.	Individuals x10; Hilperton Parish Council with Hilperton Area Action Group.

Key issues raised (Policy 53 - Land North East of Hilperton, Trowbridge)	Respondent(s)
<b>Need for smaller allocations:</b> Smaller site allocations around Trowbridge would be a more balanced approach.	Individuals x10.
<b>Unjustified housing numbers:</b> The number of homes at this location is not justified as more than the requirement.	Individuals x10.
<b>Oversupply:</b> Over supply of housing at Hilperton, significant increase threatens the historical character of Hilperton, transforming its current balance and causing a substantial surge in traffic.	Individuals x10.
<b>Existing allocations not built out:</b> Wiltshire Council is failing to implement building of existing allocations. Land to the south of Trowbridge has been supposedly earmarked for a large development for decades, yet the lack of any development suggests that demand and hence viability of the allocation are not there.	Individuals x10.
<b>Small sites need to be identified:</b> Notwithstanding the question of where strategic growth should be located in and beyond the plan period there is need for smaller scale sites that can be delivered independently, currently the draft plan is too weighted towards large scale complex sites adjacent to principal settlements.	Maxcroft Farm; Barratt; Ashford Homes - Chris Beaver.
<b>Compliance with NPPG:</b> The NPPG sets out clearly that the standard method should be seen as a minimum starting point. It is felt that the current Local Plan Review, which provides only for the minimal housing need is not ambitious nor positively prepared. The Plan is aimed to cover the next 15 years up to 2038, it should be pragmatic and plan for high growth and employment. A positive approach would be to allow for increased employment and therefore an increased housing need figure of between 40,840 and 45,630 as per the Regulation 18 consultation. The council and the Local Housing Needs Assessment update have taken the 'central' scenario as the prediction of growth. It is felt that there are serious risks with taking on board just this scenario where the Needs Assessment itself identifies that this only just meets the job requirements. In light of the unpredictability, the justified approach should be to receive further predictions of the employment market and allow for a higher increase of jobs and housing in the event that the employment market does pick back up in the coming years.	Landowner - Y Whittaker; Landowner - S Davis.
<b>Direction of growth:</b> Whilst it is welcomed that a proportionate approach is being retained within the Local Plan Review, the distribution of housing numbers is still heavily weighted towards the top tier principal settlements, with a reliance on very large and complex housing allocations. Wiltshire cannot currently demonstrate a 5-year supply of housing and much of this is down to the lack of large scale housing developments coming forward as quick as planned, such as Ashton Park in Trowbridge. It is acknowledged that there are benefits to large strategic allocations, however they need to also be supported by smaller allocations across all settlements. The overall housing numbers needs to allow for slippage. This extra allowance should be distributed across all tiers within the hierarchy. A large well serviced village such as Hilperton could provide a further 50 homes over the lifetime of the emerging plan, which would also take pressure off large scale allocations around Trowbridge, where historic delivery rates have been far slower than anticipated.	Landowner - Y Whittaker; Landowner - S Davis.



Key issues raised (Policy 53 - Land North East of Hilperton, Trowbridge)	Respondent(s)
<p><b>Proportionate development:</b> Broadly support the objectives in the policy but we object to how the plan seeks to deliver these through the associated target for the growth of the town and the proposed allocations to accommodate that growth. Other representations consider the housing requirement and the sources of housing supply are not sufficient to meet the need of Wiltshire. A proportionate increase should therefore be made to the housing requirement for Trowbridge.</p>	Savills on Behalf of Barratt Homes and Vistry.
<p><b>Historic under-delivery at Trowbridge:</b> There has been a substantial under delivery of housing in Trowbridge under the adopted plan. However, the draft emerging Plan seeks to ‘write off’ this under delivery and effectively only proposes to allocate Trowbridge c. 1,080 additional dwellings (60 dwellings per annum) over the plan period. This is not befitting of a principal settlement and will fail to safeguard or enhance its strategic role as an employment and service centre. The distribution of growth to Trowbridge is highly flawed as it is based on past build rates, which due to significant under delivery in Trowbridge since 2006, means that the requirement has been artificially suppressed. It is our view that based on existing commitments and proposed allocations, Trowbridge will only deliver 3,476 dwellings by 2038. This is some 944 dwellings below the suppressed housing requirement of 4,420 dwellings and is only marginally higher than the under delivery which has been experienced in the period 2006-2022. Given delays with the strategic commitment of Ashton Park, it is evident that even with the suppressed housing requirement for Trowbridge of 4,420 dwellings, it is likely that there will be an under delivery of circa 950 dwellings in the period to 2038. Therefore, as an absolute minimum, allocations for an additional c. 950 dwellings should be made in the town. Development in this location is in line with the underlying strategic policy objectives of the Plan, whereby new development is directed to the most sustainable locations. Given the existing Green Belt to the west of the town, a new allocation at Hilperton to the northeast of Trowbridge must be seen as a logical location for growth. There needs to be reassessment of the housing requirement in Trowbridge and additional housing allocations need to be made.</p>	Ridge (Barwood).
<p><b>Objection to changes from Reg18:</b> Object to the Plan being substantially changed from the Reg 18 version, and that the Council has completely changed its opinion on the level of growth needed for the town, moving from the need for <i>significant green field sites</i> and an allocation of large sites comprising Areas 4 and 5 in 2021 to a much smaller allocation within the original Area 5. Whilst the Council gives historical reasons for this reduction, it is not now positively planning for the future in Trowbridge and fails to deliver the ‘<i>new self-contained and sustainable community</i>’ the Council originally envisaged. The UK still faces a housing crisis, there is likely to be an election in 2024 where the standard methodology could well change, undermining the Council’s estimates of housing requirements.</p>	2x Landowner - Craddock - Cliff Lane.
<p><b>Changes from Reg 18:</b> Following Reg 18 consultation the Plan period has extended by two years to 2020 – 2038, but very surprisingly the proposed housing provision for Trowbridge has gone down.</p>	3x Landowner - Craddock - Cliff Lane.

Key issues raised (Policy 53 - Land North East of Hilperton, Trowbridge)	Respondent(s)
<p><b>Viability needs to be demonstrated:</b> Land to the south of Trowbridge (Ashton Park) has been earmarked for large-scale development for over a generation and yet has not been brought forward suggesting that demand and viability are not as great as implied by the current plan. There is no indication that the Council is pro-actively taking action to bring about the implementation of the existing allocation, nor the regeneration of disused, and under-used, industrial sites or opportunity sites at Trowbridge.</p>	<p>Hilperton Parish Council with Hilperton Area Action Group.</p>
<p><b>Site selection</b></p>	
<p><b>Improper site selection process:</b> The selection of Policy 53 and the areas selected as reasonable alternatives in Policy 3 are not soundly assessed, based on a flawed site selection that does not fully consider the range of constraints that affect this area. There are extremely poor road networks, the sites are too far from the town centre. They include areas of ecological sensitivity for rare endangered bats and red listed birds. The setting of Hilperton, a conservation area will be permanently damaged and urbanised. There are in addition drainage and flooding issues. These are important wildlife corridors that need to be protected.</p>	<p>Individuals x10.</p>
<p><b>Development too large for Village:</b> The proposed allocation at Hilperton is spatially separated from the built-up edge of Trowbridge. The proposed allocation is contiguous with the Hilperton settlement boundary. The proposed allocation, in fact, includes within it, an area of the Hilperton settlement boundary at 162 Devizes Road, comprising some 0.57 Hectares. This proposed allocation is not 'at Trowbridge' it is 'at Hilperton' and is therefore contrary to the Large Village policy of this Plan. Site 4 is contiguous with the Trowbridge settlement boundary and would NOT be isolated from the built form.</p>	<p>Trowbridge Town Council.</p>
<p><b>Site 6 - Land to the North East of Trowbridge (Site 6)</b> would not be contiguous to the town settlement boundary of Trowbridge and for this reason is being removed from further consideration for housing. However, the site has the potential to offer a country park and with it biodiversity net gains to support the locality.</p>	<p>Keevil Parish Council.</p>
<p><b>Green Belt:</b> Alternative sites within the Green Belt west of the town should have been considered.</p>	<p>Individuals x10.</p>
<p><b>Changes from Reg18 stage:</b> The change in growth after Reg 18 should clearly have necessitated a reconsideration of the preferred individual sites in their own right rather than retaining the cumulative strategic Site 5.</p>	<p>Maxcroft Farm; Barratt.</p>
<p><b>Site Constraints:</b> Overall, the proposed draft allocation has a number of constraints and viability challenges which seriously impacts on the soundness of the draft allocation.</p>	<p>Maxcroft Farm; Barratt.</p>
<p><b>Green Belt land:</b> The decision to exclude land within the Green Belt at Stage 1 of the site selection process, contrary to the recommendation of the Sustainability Appraisal (SA), fundamentally undermines the robustness of the site selection process. In so doing it disregards reasonable alternative locations for development</p>	<p>Savills on Behalf of Barratt Homes and Vistry.</p>

Key issues raised (Policy 53 - Land North East of Hilperton, Trowbridge)	Respondent(s)
<p>prematurely, a decision which renders the DLP both unsound and in conflict with the Strategic Environmental Assessment Regulations. Consideration to all reasonable site alternatives was not given. It is suggested that exceptional circumstances for the release of Land from the Green Belt exist.</p>	
<p><b>Site extension:</b></p> <ul style="list-style-type: none"> <li>• Question how the Council firstly has arrived at its reduced housing figures for Trowbridge; secondly how it has configured the new Area 5 and finally why it has removed New Barn Farm and the adjoining sites from Area 5.</li> <li>• Allocation: The new Area 5 has been considerably reduced in size, no longer fulfils the promise of ‘a <i>self-contained and sustainable new community</i>’, extends a considerable distance into the countryside and residents will be very car dependent.</li> <li>• By adding New Barn Farm and the two adjoining parcels to the currently proposed Area 5 allocation, it would create a development with a better critical mass to provide education, community facilities, neighbourhood centre, a circular bus route, and plenty of public open space all needed for a new sustainable residential community.</li> <li>• New Barn Farm and the two adjacent parcels are available now to developers, and with their good linkages back to the neighbouring settlement could be sites which developers may be interested in again for providing prompt delivery, bearing in mind the planning process could take at least five years with the local plan and a planning application.</li> </ul>	<p>3x Landowner - Craddock - Cliff Lane.</p>
<p><b>Site Selection Methodology:</b> Methodology Stage 2 questions the Landscape is marked as red for 723 and 677a and in all three sites there are more amber or red scores than green. Site selection criteria for 641, 677a does not appear to have followed the prescribed methodology and therefore should not be included. The addition of site 677a was not consulted upon at Reg 18 and question legal grounds for inclusion.</p>	<p>Hilperton Parish Council with Hilperton Area Action Group.</p>
<p><b>Site Selection Methodology:</b> The plan is not sound as it does not meet the criteria laid out in the Wiltshire Site Selection Policy Methodology on all grounds: biodiversity, landscape, traffic, accessibility, flood risk and Heritage and this is not reflected in the site selection which has allowed this land to be put forward. We consider that there needs to be another more appropriate site allocation for these houses on a more accessible site with less risk factors.</p>	<p>Hilperton Parish Council with Hilperton Area Action Group.</p>
<p><b>Lack of consultation:</b> The preparation of a Local Plan covering the whole of Wiltshire – from Cricklade to Downton, Ludgershall to Bradford on Avon – has proved a crude and wieldy document. The Plan lacks the finesse normally associated with local planning and faithful public consultation. In the case of Policy 53 there</p>	<p>Hilperton Parish Council with Hilperton Area Action Group.</p>

Key issues raised (Policy 53 - Land North East of Hilperton, Trowbridge)	Respondent(s)
<p>has never been a consultation explaining and exploring the issues associated with a large additional housing development beyond Hilperton. As a consequence, concerns such traffic congestion, and the allocation of land that includes a large underground reservoir, have been glossed over.</p>	
<p><b>Unclear information regarding timing and level of development:</b> The allocated site North-East of Hilperton was part of a much larger allocation in the Regulation 18 consultation plan. The consistent evidence from both the Regulation 18 and 19 consultations is therefore that growth to the north east of Hilperton is the most sustainable location for peripheral expansion of Trowbridge. The only issue is therefore the timing and quantum of growth to be planned for at this stage, and the phasing of delivery within, and potentially beyond, the plan period.</p>	Lightwood.
<p><b>Sustainability Appraisal:</b> In terms of the SA that supports the proposals for Trowbridge, there is nothing to distinguish the site that is allocated for 600 homes in the Regulation 19 plan from the much larger land area. In terms of its performance against the SA, there is no differentiation of the allocated site from a much larger allocation of up to 5,000 dwellings at north-west Hilperton, and which includes additional land extending further east along the A361 than the site that was identified and assessed through the Regulation 18 consultation. Indeed, as cited above, the SA indicates there to be considerable sustainability advantages associated with a larger site. The evidence indicates that, when assessed on its own, it might perform less well than as part of a larger site that was considered through the SA.</p>	Lightwood.
<p><b>Alternative Sites/Strategies:</b> This site-specific assessment endorses the outputs from the broader brush Assessment of Alternative Development Strategies for the Trowbridge HMA and further challenges the veracity of the revised growth strategy in which levels of growth were reduced below those tested and found not to give rise to unacceptable environmental impacts. The SA of the alternative strategies foreshadows that the assessment of individual development sites may yield locations where development could take place in the HMA's settlements where potential negative impacts, with mitigation, could be reduced.</p>	Lightwood.
<p><b>Sustainability Appraisal:</b> The scale of the site allocated under Policy 53 is therefore not limited by its performance in the SA since the site was assessed in conjunction with a much more extensive land area, and therefore prospective scale of development. On the contrary, it is clear from the SA that there are benefits in terms of managing and mitigating negative impacts, and enhancing positive impacts against other SA objectives, through incorporating a much larger site and greater scale of development. Support the allocation in principle as part of a broader location which the evidence base indicates is capable of accommodating significant strategic growth but considers that a much greater scale of growth north of Trowbridge should be planned for now. The sustainable credentials of a much greater scale of growth in this location are again endorsed by the evidence of the SA relating to both the assessment of alternative development strategies, and the site-specific assessments.</p>	Lightwood.

Key issues raised (Policy 53 - Land North East of Hilperton, Trowbridge)	Respondent(s)
<p><b>Unfeasible to deliver infrastructure with development:</b> Do not consider that it is of a sufficient size to deliver 600 dwellings together with all the necessary supporting infrastructure by which it must be accompanied. The Council has applied a density assumption of 25-35 dwellings per hectare to the gross site areas, which is an incorrect approach. This would appear to be endorsed by Policy 53 which assumes a gross density of 18 dwellings per hectare, net of any SANG requirement. The proposed Country Park is not justified by the 600 dwellings that are allocated in accordance with Policy 53, and the policy cannot reasonably require that it is delivered. For this reason the specific requirement for the provision of SANG in accordance with Policy 54 should be deleted to enable alternative options for a proportionate SANG to be delivered.</p>	Lightwood.
<p><b>Direction of Growth:</b> The larger allocation in the Regulation 18 Plan indicates that further growth to the north is an inevitability. Given the acknowledged need to consider a broad location for further growth at Trowbridge, which is reflected in Policy 52, the clear evidence from the SA and other evidence base documents that there is significant further capacity to the north beyond the current allocation. The overall housing requirement at Trowbridge will likely need to increase significantly to accommodate the extended plan period requirement, avoid embedding suppressed growth due to past under-delivery, achieve its intended role as a principal settlement and County town, and possibly to maintain overall housing delivery in the authority given the constraints at Salisbury. The provisions of Policy 53 reflect the importance attributed by the Council to a single, comprehensive masterplan. Those benefits are compounded in the case of a larger scale of development, and there is a risk compromising the wider development, including a secondary school, that seems an inevitability later in the Plan period. Create Streets have prepared a comprehensive masterplan for Site 5 and the wider area, which includes provisions for a secondary school, local centres, and useable SANG in the general location indicated by the Council in Policy 54. The vision document, and associated masterplan, clearly endorse the sustainable benefits of planning for a larger scale of growth on a comprehensive basis. There is clear support in the NPPF for planning for a larger scale of development</p>	Lightwood.
<p><b>Omission sites:</b></p> <ul style="list-style-type: none"> <li>• Omission site - Maxcroft Farm</li> <li>• Omission site - Phase 2, Church Harm Hilperton, Ashford Homes (SW) Ltd</li> <li>• Omission site - Land to the West of Trowbridge</li> <li>• Omission site - Land north of Hill Street / west of Greenhill Gardens</li> <li>• Omission site - New Barn Farm and two smaller parcels of land to the southwest of the Farm, which were shown as part of the Reg 18 Area 5 allocation in 2021 but is not included in the Reg 19 Area 5 allocation in 2023.</li> </ul>	Maxcroft Farm; Barratt; Ashford Homes/ Chris Beaver; Savills on Behalf of Barratt Homes and Vistry; Landowner - Barwood; and 2x Landowner - Craddock.

Table 5.68 [Policy 54 - North Trowbridge Country Park] key issues

Key issues raised (Policy 54 - North Trowbridge Country Park)	Respondent(s)
<b>Policy support</b>	
<p><b>Supports inclusion of policy:</b> Full support for the provision of a 65 ha Country Park as set out in Policy 54 and Figure 4.39. However, It is not clear who will manage this resource, support for Country Park from parish councils, some conditional support the provision of a new Country Park at North Trowbridge and that the country park is implemented before any development starts should be made a condition.</p>	<p>Natural England; Barwood Land, Barwood Land, Redcliffe (S Davis); Hilperton Parish Council with Hilperton Area Action Group; Steeple Ashton Parish Council; Westwood, Semington and Wingfield Parish Councils; Keevil Parish Council; Individuals x10.</p>
<p><b>Land owner objection:</b> A population multiplier of 2.4 people per dwelling generates a requirement for 10 hectares of SANG in association with a development of 600 dwellings. It follows that there is a substantial discrepancy between the amount of land that Policy 54 seeks to lock down as SANG, and the level of SANG that is needed to mitigate the scale of development identified in Policy 53. The Policy 54 area would provide sufficient SANG for 3,385 dwellings, whereas the Plan only commits to 600 dwellings. The current plan is non-committal in terms of scales of growth and locations at Trowbridge. There is therefore no certainty that any future review will commit to a location and scale of growth that will justify a SANG of the size, and in the location, proposed through Policy 54.</p>	<p>Lightwood Strategic.</p>
<p><b>Justification:</b> The provision of a country park would not mitigate the 'likely significant effects' of the development. It is not even clear that it applies to the development identified in Policy 53 and could not be used to seek to justify speculative development. The policy should be reworded to clearly state that it is permissive of development on the site, not a justification for development on other related sites. Concerns that because of a lack of consultation with local communities considered through a master planned approach with other land in the area, strategic opportunities are being lost, missed and overlooked at this partial plan submission.</p>	<p>Hilperton Parish Council with Hilperton Area Action Group.</p>
<p><b>Timing:</b> The Country Park should be brought forward in advance of any development within the allocation in Policy 53. There is a need for smaller housing sites which are not reliant on strategic SANG and can mitigate biodiversity effects in their own right and be delivered early in the plan period. The Draft Plan predetermines where the Broad Location for Growth should be within Trowbridge and Hilperton. Clearly these two issues cannot be disaggregated and need to be considered in the round via an assessment of all reasonable alternatives.</p>	<p>Barratt Homes.</p>
<p><b>Timing:</b> Concern that country park will not be funded as planned but will only be funded with the expectation of the extra housing beyond this Plan.</p>	<p>Individuals x10.</p>

Key issues raised (Policy 54 - North Trowbridge Country Park)	Respondent(s)
<p><b>Functionality and Alternative Site options:</b> Question whether it is sufficiently well located to function as an attractive alternative to the protected woodland. It is disconnected from the existing urban area by such a distance that it is only likely to represent an alternative for people who would ordinarily travel by car to an informal recreation destination. The SANG is unlikely to be particularly appealing to those without access to a car. A comprehensively planned development to the West of Trowbridge supported by considerable green infrastructure represents a more suitable and sustainable option for the growth of the town than disconnected residential development and open space to the north of the town. The proposed expansion of the Southwick Country Park as part of a comprehensive development to the west of Trowbridge would provide a well located recreational resource for both occupants of the new homes and the existing resident of Trowbridge through the creation of attractive and usable green corridors and connections. Provision can also be made for parking for those that wish to travel by car from further afield.</p>	Barratt Homes; Vistry.
<p><b>Biodiversity:</b> The proposed development is contrary to legislation and directives with regards to the protection of bats. Development cannot enhance biodiversity. The size of Southwick is much larger than the proposed one for Hilperton and recreational pressure is impacting there. Therefore Policy 54 is unsound.</p>	Individuals x10.
<p><b>Landscape:</b> The east side of Trowbridge has valued landscapes, destruction and recreational pressure that includes Policy 54, would bring phenomenal damage and ecological catechisms.</p>	Individuals x10.
<p><b>Size of site:</b> Consideration should be given to bringing forward the Country Park in advance of any development within the allocation in Policy 53 (Land North-East of Hilperton, Trowbridge). In the assessment tables of the Planning For Trowbridge paper, all of the Paxcroft Farm land / section 6 is still marked as 'take forward', including an area east of the A350. Keevil Parish Council opposes any suggestion of development on the eastern side of Hag Hill at <i>Cold Harbour</i>.</p>	Keevil Parish Council.
<p><b>Policy conditions:</b> The requirement for this to be made available in its entirety prior to the occupation of the first dwelling of the 'land north east of Hilperton' allocation is unrealistic and unnecessarily onerous. It is unclear if / when this land will be made available for a country park by the owners, and it is wholly unreasonable and unnecessary to expect the developers of the housing allocation to be held to ransom by a third party on when they can sell properties. It is not clear if this is first occupation or last. Assuming its first, this is a significant expense up front before any developer has sold any houses. This is not a sound approach and would have serious connotations for the deliverability of the allocation as a whole. Further detail on the implementation trigger point required.</p>	Barwood Land; Barwood Land; Redcliffe (S Davis); Redcliffe (Y Whittaker).
<p><b>Management plan:</b> The Environmental Improvement Plan sets out that everyone in England should live within a 15-minute walk of nature and it is essential that the Local Plan ensures easy access to the natural environment that is rich in wildlife with opportunities to engage in the natural world. All potential SANG have a management plan and funding that is focused on biodiversity not just amenity purposes. Wiltshire Wildlife Trust recognises</p>	Wiltshire Wildlife Trust.

Key issues raised (Policy 54 - North Trowbridge Country Park)	Respondent(s)
<p>that significant effort has been made to create Suitable Alternative Natural Greenspace (SANG) but would want to see commitments that all SANG are created in addition to any mitigation and in place before the first house is occupied. All policies relating to SANG should include: <i>the delivery of Suitable Alternative Natural Greenspace (SANG) will not be considered as off-site mitigation and all mitigation undertaken is in addition to the creation of these sites. The delivery of Suitable Alternative Natural Greenspace (SANG) should be completed before first occupation.</i></p>	
<p><b>Management:</b> It is not clear who will manage this resource.</p>	Westwood, Semington, and Wingfield Parish Councils.
<p><b>Funding:</b> The Policy confirms that the new County Park will need to be available in full to act as a SANG prior to any occupations at North East Hilperton. This will add major cost and time to the delivery of the draft allocation significantly delaying housing as it did with Ashton Park. The costs of delivering the new park are anticipated to be raised by the proposed strategic allocations to the north of Trowbridge (i.e. the wider Site 5) though there are no costs attributed to it within the IDP. Clearly this is likely to be a very onerous requirement for a c.600 unit housing scheme without contributions from wider development land. Country Park dependent on additional development raising doubts about its funding and effectiveness as environmental mitigation during the Local Plan period.</p>	Barratt Homes; Individuals x10.
<p><b>Road network:</b> Further development at Trowbridge requires substantial improvement to the infrastructure including new bridges over the Avon.</p>	Individuals x10.
<p><b>Point of clarity in policy text:</b> Noted that policy 54 states that the Hag Hill green space will be available to the public in perpetuity, before occupation of the first dwelling in the development NE of Hilperton as set out in policy 52 (and/or 53??). This is necessary to meet the requirement for SANG. However, this is contradicted by Para 4.269 which merely says that "consideration will be given to bringing forward the Country park" before the housing development commences.</p>	Individuals x10.
<p><b>Delivery:</b> Why is this policy is not titled 'Hilperton Country Park'. With the history of abject failure by Wiltshire Council to secure 'open space' for building mitigation, it is essential that the whole of this 'country park' is secured before any housing reliant on the country park is permitted to be commenced (if the Inspector decides they should be built).</p>	Elected member x1.



Table 5.69 [Policy 55 - Land at Innox Mills, Trowbridge] key issues

Key issues raised (Policy 55 - Land at Innox Mills, Trowbridge)	Respondent(s)
<b>Policy support</b>	
<b>Overall support:</b> Support policy and support for development of brownfield sites in order to preserve our green spaces.	Hilperton Parish Council; Individual x10.
<p><b>River corridor:</b> Support the requirement for enhancing the River Biss corridor, measures should include enhancing the river as an ecological corridor and include a requirement to avoid additional light spill from the developed areas onto the river corridor, Residential development has been indicated on the concept in that part of the site within flood zones 2 and 3. The policy wording does not mention flood risk. The Sequential Test should have been undertaken for the site.</p> <p>The Environment Agency would like to see the term ‘river restoration’ used in this policy, rather than just enhancement. Although this is a heavily modified stretch of urban watercourse, it has been suggested that it is possible and desirable to restore these watercourses to an appropriate level of naturalisation, e.g. this has been done as part of the Salisbury River Park, incorporating multiple benefits for the city.</p>	Natural England; Environment Agency.
<p><b>Historic Environment:</b> The SA considers there is a low potential impact on the historic environment. Does the local authority heritage expertise consider this is the case and whether the policy caveats are appropriate and adequate? Will there be a Design Code for this large site? A suggested change to “..sensitive design and layout, which ensures the significance of heritage assets and their settings, on and adjacent to the site, including the Trowbridge Conservation Area and it’s setting, are not subject to unacceptable harm;”. Instead of expecting development to avoid “unacceptable harm” the Plan should refer to a positive expectation that a future masterplan should ensure heritage assets are conserved in a manner appropriate to their significance, that development is sympathetic to local character and history, including the surrounding built environment and landscape setting.</p>	Historic England.
<p><b>Remediation:</b> The site is a complex brownfield site with likely extensive and costly site remediation which is a constraint to site delivery. Site trajectory using realistic assumptions need to be in the Draft Plan’s evidence base.</p>	Barratt Homes.
<p><b>Housing:</b> Policy fails to maximise efficient use of land at the site in line with Government policy to utilise brownfield land in sustainable locations rather than greenfield, there is a lack of affordable housing provision, objection to the quantum of development as current application has demonstrated that the site has capacity to accommodate up to 255 dwellings however affordable housing provision as a minimum of 10% does not have regard to the viability appraisal dated April 2023 which confirms that the site cannot afford any affordable housing on a nil subsidy basis due to the high abnormal infrastructure and remediation costs.</p>	Hilperton Parish Council; Innox Mills Ltd.

Key issues raised (Policy 55 - Land at Innox Mills, Trowbridge)	Respondent(s)
<p><b>Transport:</b> The railway station should be referred to as 'adjacent to the site'. The Policy should reflect the recent 'Innox Mills, Trowbridge – Access to Railway Station Car Park', (PL/2021/08551), 23<sup>rd</sup> October 2023, with regards to access and potential future changes to railway station car park and access from Stallard Street.</p>	Trowbridge Town Council.
<p><b>Site Viability:</b> The number of proposed homes is too low. Lift access to the railway station should be deleted. Financial contributions towards early years, primary and secondary education places: the conclusion of the open book viability process pursuant to the current planning application has concluded that the development cannot afford any financial commuted sum payments and that the fourth bullet of Policy 55 should be deleted with a viability explanation added to the supporting text. The Concept Plan shows 2 No. offsite highway elements that is unviable for the application proposal to deliver: (i) new bus transport inter-change on the northern Station car park; and (ii) the closure of the Station Road access onto Stallard Street. The notes to the Policy 55 Concept Plan should be amended, along with additional explanation in the supporting text, that these off-site elements are 'longer term aspirations' whose delivery should not be 'prejudiced' by the application proposals, and that they will be delivered by public sector funding.</p>	Innox Mills Ltd.

**Table 5.70 [Policy 56 - Trowbridge Central Area] key issues**

Key issues raised (Policy 56 - Trowbridge Central Area)	Respondent(s)
<b>Support:</b> Supports the overall aims and objectives of Policy 56.	Hilperton Parish Council.
<b>Policy wording:</b> Riverway Industrial Estate [para 4.295]: It should be noted there are several permitted waste processing facilities on the Riverway Industrial Estate. This policy should therefore also include in its mitigation requirements; assessments of potential noise and odour impacts from the adjacent waste processing facilities to inform an appropriate layout and necessary mitigation measures.	Environment Agency.
<b>Policy wording:</b> Areas of Opportunity [para 4.295]: The Areas of Opportunity should be adjusted as indicated in the modifications proposed.	Trowbridge Town Council.
<b>Policy wording:</b> Reference to neighbourhood plan [para 4.297]: The Neighbourhood Plan paragraph is incorrect.	Trowbridge Town Council.

Table 5.71 [Policy 57 - Bradford on Avon Market Town] key issues

Key issues raised (Policy 57 - Bradford on Avon Market Town)	Respondent(s)
<b>Policy Support</b>	
<b>Conditional support:</b> Support is given for all/ part of Policy 57 is provided by a number of representors.	Vistry Group; Natural England; Wiltshire Scullers.
<b>Housing &amp; Employment</b>	
<b>Inadequate level of housing allocated for Bradford on Avon:</b> The LPR fails to appraise all of the potential options to meet the unmet housing need in Bradford on Avon and allocates an inadequate level of housing. The level of growth in Bradford on Avon has exceeded the levels identified within the Core Strategy which confirms the sustainability of Bradford on Avon as a location for new development. Objectively assessed housing need is an indication of the minimum number of dwellings required. The housing requirement should be increased, reflecting affordability adjustments to the overall housing need figure.	Vistry Group; European Property Venture (Wiltshire).
<b>Release of land from the green belt to meet Bradford on Avon's housing (&amp; affordable housing) need:</b> New development will be delivered through windfall sites but paragraph 4.273 (of the LPR) states the majority of development opportunities within the settlement have been built out. The most appropriate mechanism for securing new sustainable residential development is by allocating a suitable range of sites, released from the green belt. The unmet housing need and the discrepancy between earnings and house prices would provide the exceptional circumstances to justify green belt review.	European Property Venture (Wiltshire); Vistry Group; Waddeton Park Ltd.
<b>Uncertain affordable housing provision:</b> The reliance on windfall to deliver 80 dwellings provides no certainty of delivery of affordable housing plus the threshold for site size (less than 10 dwellings) falls below the threshold for affordable housing provision. Affordable housing will not be provided unless the Reserve Site is released for development - a site with contamination issues which could further reduce deliverability. A lower threshold and higher obligation would effect viability, discouraging prospective developers who would look elsewhere for sites with a lower affordable housing requirement.	Vistry Group; Waddeton Park Ltd; European Property Venture (Wiltshire).
<b>Affordable housing provision does not reflect need:</b> The evidence confirms that between 2009-2018, 22.8% of homes built were affordable, which is significantly below the 40% target. Net affordable housing completions have not kept pace with need.	Waddeton Park Ltd.
<b>Housing provision via infill:</b> It will be difficult to provide 80 houses via infill within the town as remaining sites are inaccessible or located on very steep sites.	Bradford on Avon LHFIG & Bradford on Avon Town Council Sustainable Travel Committee.
<b>Lack of evidence for housing allocations:</b> There is a lack of evidence-based support for some of the housing allocations. Policy wording amendments were suggested by the Representor.	Bradford on Avon Town Council.

Key issues raised (Policy 57 - Bradford on Avon Market Town)	Respondent(s)
<b>The policy should reference local works being undertaken by the Environment Agency:</b> Reference should be made to the Flood Reduction project being led by the Environment Agency, given the historic architecture and need to retain existing employment uses identified in the plan.	Environment Agency.
<b>The importance and protection of Bradford on Avon's employment/ commercial land:</b> The LPR should acknowledge the loss of employment and commercial space to housing over the last plan period and should note the importance of employment/ commercial base retention.	Individuals x10.
<b>Transport/ Traffic / Infrastructure</b>	
<b>Significant traffic-related problems associated with Bradford on Avon:</b> Traffic is currently a huge problem in the town and won't improve until there are less cars on the road, the town is more pedestrian friendly and the air less polluted. There should be strenuous efforts to improve air quality and road safety on the narrow town streets. Public transport could be improved.	Individuals x10; Bradford on Avon LHFIG & Bradford on Avon Town Council Sustainable Travel Committee.
<b>Transport-related funding required:</b> Funding to implement changes to the traffic arrangements and a new safer pedestrian crossing or bridge should be prioritised.	Bradford on Avon LHFIG & Bradford on Avon Town Council Sustainable Travel Committee.
<b>How traffic-related improvements will be achieved is not specified:</b> The Plan doesn't make clear how it will achieve the transport-related aspirations that are detailed for Bradford on Avon, including how extra cars will be managed or air quality improved. The Plan should prioritise more sustainable methods of transport.	Bradford on Avon Town Council.
<b>Lack of public services in the town:</b> Healthcare (dental and medical) services and schools will be stretched by additional housing. There is already a lack of public services in the town.	Individuals x10.
<b>Infrastructure provision improvements not specified:</b> There is no detail of how increased infrastructure provision (health facilities, schools, recreational facilities etc) will be achieved. Developments surrounding the area will also impact on shared infrastructure in terms of increased traffic, health facilities etc.	Bradford on Avon Town Council.
<b>Biodiversity/ Environment</b>	
<b>The importance of Bradford on Avon's biodiversity:</b> The biodiversity of Bradford on Avon is an intrinsic part of the distinctive character and quality of the town and should be recognised. Policy wording amendments were suggested by the Representor.	Individuals x10.
<b>Insufficient detail of how biodiversity has been assessed:</b> There is no evidence that thorough surveys of existing biodiverse areas and wildlife habitats have been carried out.	Bradford on Avon Town Council.
<b>Lack of climate change detail:</b> There is no mention or evidence of carbon budgets or carbon emissions or details of whether policies are consistent with Wiltshire's Climate Emergency Declaration (net zero by 2030).	Bradford on Avon Town Council.

Key issues raised (Policy 57 - Bradford on Avon Market Town)	Respondent(s)
<b>Miscellaneous</b>	
<b>Additional detail required on Policies Map:</b> Local Green Space, the Cotswold AONB and Conservation Area designations should be detailed on Figure 4.42, as these are equivalent to green belt status, which is currently shown.	Individuals x10.
<b>New Case Officer is required to consider new planning requirements:</b> Lack of detail regarding a case officer to assess the acceptability of new planning applications against the new objectives eg. drainage systems, biodiversity net gains and water efficiency or how community-led renewable energy schemes could be encouraged and maximised.	Bradford on Avon Town Council.
<b>Neighbourhood Planning</b>	
<b>Lack of allocated sites within the Local Plan:</b> Object to requiring Bradford on Avon's residual housing requirement to be met through small & medium sized sites but the Plan fails to allocate any sites. The Neighbourhood Plan will be able to identify and support suitable sites for future development. A call for sites has already been issued, which may be able to offer more than the 15 homes calculated in the neighbourhood area requirement.	Bradford on Avon Town Council.
<b>Insufficient level of housing growth identified within the Neighbourhood Plan:</b> The designation of 15 dwellings within the Neighbourhood Plan is insufficient in aiding affordable homes provision or providing flexibility to proactively plan for growth. Such a low level of housing growth is inconsistent with other settlements e.g. Melksham (270 dwellings) and Royal Wootton Bassett (150 dwellings) and even smaller settlements e.g. Malmesbury (35 dwellings) and Corsham (40 dwellings). The number of designated dwellings should be revised.	Waddeton Park Ltd; Cala Homes (Thames) Ltd.
<b>Release of land from the green belt to meet the Neighbourhood Plan housing requirement:</b> The LPR does not appropriately facilitate the Neighbourhood Plan review to meet the designated area requirement, particularly as the plan states the majority of sites have been built out. It will be challenging for the Neighbourhood Plan to identify suitable sites whilst expansion of the settlement is constrained by green belt. Sites should be released from the green belt, to enable the Neighbourhood Plan Review to meet the housing requirement.	European Property Venture (Wiltshire).
<b>Planning for Bradford on Avon</b>	
<b>Figure 1 (plus supporting text ) and Para 33:</b> This should detail the 7 designated Local Green Spaces (as shown on Map 4, Bradford on Avon Neighbourhood Plan) as having the same weight and status as the green belt, plus environmental constraints should be detailed. Local Green Spaces are also referenced within Tables 8 & 9 therefore they should be shown on Figure 1.	Individuals x10; Bradford on Avon Town Council.

Key issues raised (Policy 57 - Bradford on Avon Market Town)	Respondent(s)
<b>Table 3:</b> Place Shaping Principal 4 should address both the historic and natural environment, referencing the landscape setting and biodiversity of Bradford on Avon. Policy wording amendments were suggested by the Representor.	Individuals x10.
<b>The importance of employment space:</b> Paragraph 37 should detail the significant loss of employment space over the last plan period and that future planning decisions should protect the employment base of the town. Balancing housing & employment improves the sustainability of the town and reduces the need for people to travel.	Individuals x10.
<b>Figure 7 requires clarification:</b> The numbering of the pool of sites to the east of Woolley are difficult to read and there is duplication (ref: 3102a).	Individuals x10.
<b>Biodiversity impact should have been a Stage 2 sifting criteria:</b> At Stage 2 – Site Sifting (para A10), biodiversity impact should be added to the list of wider impacts assessed given the landscape setting and the national importance of the bat population in Bradford on Avon.	Individuals x10.
<b>Table 8 – Significant Environmental Factors:</b> Table 8 should include reference to the landscape setting of Bradford on Avon and the AONB as well as the very large number of listed buildings. Policy wording amendments were suggested by the Representor.	Individuals x10.
<b>Table 12:</b> i) Site 2 – reference should be added to the site being adjacent to a Local Green Space at Woolley which would require buffering, and ii) Site 3 – this site is not a designated local green space . The text should be clear as to what is (and what is not) designated Local Green Space.	Individuals x10.
<b>Concerns relating to the 'Reserve' site are noted within the Planning for Bradford on Avon document:</b> At the 'Selecting Sites' section, the document details potential access issues relating to the reserve site which could increase traffic on Trowbridge Road/ towards Bath and agrees with the statement that this is a 'notable weakness' . The site is contrary to the town's Place Shaping Principles and is of significant concern to the town, specifically considering the traffic concerns and issues of Bradford on Avon.	Bradford on Avon Town Council.
<b>Sustainability Appraisal (SA)</b>	
<b>The policy approach for Bradford on Avon does not sufficiently take into account the SA findings:</b> The SA recognises the need to prioritise affordable housing provision to meet need and highlights the constraints associated with Bradford on Avon. Despite this the LPR fails to allocate sufficient dwellings. The evidence base demonstrates Bradford on Avon to be the least affordable location within the HMA, with the most limited supply of affordable homes. In the absence of a specific Bradford on Avon Affordable Housing policy, a review of the green belt around Bradford on Avon, as recommended within the SA, should occur.	Vistry Group; Waddeton Park Ltd.

Key issues raised (Policy 57 - Bradford on Avon Market Town)	Respondent(s)
<p><b>SA site assessment error:</b> An error has occurred with regard to SA Site 2 in relation to the site's ecology assessment and mitigation considerations relating to self-seeded trees and bats. If the Representor's Regulation 18 response had been considered, the allocation of Site 2 would have been supported. An assessment of Site 2's performance against the 12 SA objectives is provided.</p>	Shappard & Barrow Ltd.
<p><b>Exclusion of a site on green belt grounds:</b> A site (Land off Trowbridge Road) was excluded at Stage 1 as is contained within the green belt. This undermines the soundness of the selection process and disregards the requirement to plan for sustainable development by prematurely discounting a reasonable alternative site. This is confusing as the SA recommends a review of the green belt in Bradford on Avon. The site represents a reasonable alternative and should have been tested as such. An assessment of the site is provided, which concludes that, if it not excluded at Stage 1, it would have scored more favourably than the reserve site.</p>	Waddeton Park Ltd.
<p><b>The SA has not considered all sites:</b> The SA has not considered all the reasonable alternative sites, especially for increased growth at Bradford on Avon. Also the approach of the plan which includes potential for more growth at Trowbridge, alongside high levels of growth outside of the main towns, is a strategy which has not been tested through the SA. Policy wording amendments were suggested by the Representor.</p>	Cala Homes (Thames) Ltd.
<b>Trowbridge HMA Alternative Development Strategy</b>	
<p><b>The document has not adequately assessed the need for a green belt review:</b> This document provides an over-simplistic assessment of the need for a green belt review by asserting that a review wouldn't increase the scope for peripheral expansion, due to the extent of risk. This has not been thoroughly appraised through the LPR evidence base. and doesn't recognise the exceptional circumstances that exist i.e. the identified local need and disparity between earnings and house prices within Bradford on Avon.</p>	Vistry Group.
<p><b>Affordable housing need requires the need for additional housing allocations:</b> As housing provision for Bradford on Avon will met be via small scale infill/ windfall on previously developed land, there is no prospect for additional delivery of affordable housing for which there is a demonstrable need. Additional housing allocations are required to ensure continuity of supply.</p>	Sheppard and Barrow Ltd.
<b>Other LPR Policy Comments related to Policy 57</b>	
<p><b>Policy 2 (Development strategy) - release of land from the green belt to meet the assessed housing need:</b> This policy identifies 'constrained' settlements, of which Bradford on Avon is one. Limiting development to windfall sites of no more than 10 dwellings is overly restrictive and overstates the constraints to the settlement. The LPR can be a process for reviewing the green belt boundary and land could be released for development. Bradford on Avon's location within the green belt should not represent a constraint to delivery of new development provided the exceptional circumstances to justify green belt release (NPPF para 140) are demonstrated.</p>	European Property Venture (Wiltshire).



Key issues raised (Policy 57 - Bradford on Avon Market Town)	Respondent(s)
<p><b>Policy 2 (Development strategy) - amendment to the housing requirements for Bradford on Avon:</b> Having regard to the evidence on need &amp; supply (including that detailed within the SA) the housing requirement for Bradford on Avon should be set at 290 dwellings. This minimum target represents 3.18% of the wider Trowbridge HMA. The representor has made suggested changes to the policy to address their comments.</p>	Cala Homes (Thames) Ltd.
<p><b>Policy 3 (Reserve sites for housing and broad locations for growth):</b> The reserve category is disingenuous in that it can be triggered by a continued failure to achieve the 5 year housing supply. Failings elsewhere in the county could become impactful and detrimental to Bradford on Avon. Speculative planning applications could result if the 5 year housing supply is not met, resulting in the reserve sites needing to be developed during the plan period.</p>	Bradford on Avon Town Council.
<p><b>RESERVE SITE - Land at Former Golf Course, Bradford on Avon related comments</b></p> <p><b>The following comments relate specifically to the above site and are broken down into relevant categories for ease of reference</b></p>	
<p><b>Petition:</b> A petition was submitted to Wiltshire Council in relation to the Reserve Site. This consisted 1067 hand written signatures and 1063 electronic signatures at the point of submission. The Town Council and signatories seek the removal of the Bradford on Avon former golf course as a reserve site for development. The development of this site would see the loss of a valued and important green space in the town and it would have a detrimental impact for landscape and wildlife.</p>	Bradford on Avon Town Council; Individuals (handwritten) x1067; Individuals x1063 (electronic)
<p><b>General/ Miscellaneous</b></p>	
<p><b>Exclude the Reserve Site:</b> The site should be excluded from the list of reserves sites, especially as Bradford on Avon is a constrained town with pre-existing capacity issues.</p>	Individuals x20; Bradford on Avon Town Council; European Property Venture (Wiltshire).
<p><b>The Reserve Site has significant issues/ constraints:</b> The development of the reserve site is deeply contentious and unpopular. The site's viability is questioned, as is it's ability to deliver affordable homes to the town. There are concerns regarding vehicle access, flood risk, limitations on the developable area due to the Wessex Water pumping Station and approximately 25-30% of the site could be contaminated (requiring costly mitigation and remediation works). No reference is made to the ransom strip along the potential access from Greenland.</p>	Bradford on Avon Town Council.
<p><b>Incomplete baseline information:</b> The collection of baseline information for the site is incomplete and the categorisation of impacts is unclear.</p>	Bradford on Avon Town Council.
<p><b>Lack of evidence base:</b> There are numerous errors &amp; subjective judgements unsupported by the evidence in the 'Planning for Bradford on Avon' document and the SA Annex 2.2 Trowbridge HMA: Bradford on Avon sites'. The only reasons the site has been identified is i) that part of the site is outside of the green belt, ii) a lack of</p>	Bradford on Avon Town Council; Individuals x10.

Key issues raised (Policy 57 - Bradford on Avon Market Town)	Respondent(s)
local knowledge about the history and topography of the site, iii) underestimating the community value of the site, and iv) more detailed assessments haven't been complete. The site is not deliverable and fails to meet the effective element of the plan. There is a lack of evidence-base to justify this site's inclusion and ability to bring forward affordable housing.	
<b>Lack of an alternative site is not justification for inclusion:</b> This site has been proposed just because no other sites exist, even though this is the wrong decision.	Individuals x10.
<b>Lack of Habitat Regulations Assessment:</b> There has been no assessment of the site under Wiltshire Council's HRA.	Individuals x10.
<b>Lack of consideration of legal impediments:</b> There is no mention of the legal impediments to developing this site. These have either been ignored, omitted or not researched.	Individuals x10.
<b>Assessment of the golf course loss:</b> The loss of the golf course needs to be justified by an assessment, as set out in para 98 of the NPPF, with terms agreed by Sport England and England Golf.	Sports England.
<b>Removal of covenant:</b> Object to the removal of the covenant on this site.	Individuals x10.
<b>Previous assessments/ site-specific reasons why the site is not viable:</b> The golf course site was previously promoted through the Core Strategy and rejected in favour of the site at Kingston Farm under the SA that was then carried out. The Kingston Farm site was considered more sustainable in terms of traffic distribution impact upon the restricted Town Bridge and Masons Lane AQMA. Planning applications on the golf course site have generated much local objection. There are viability questions over deliverability of affordable housing associated with the golf course site and it's not a suitable for allocation.	Sheppard and Barrow Ltd.
<b>The assessment of noise and vibration in the Sustainability Appraisal is subjective:</b> The assessment of noise and vibration, at page 19, is a subjective opinion of someone who will not have to experience this disruption.	Individuals x10.
<b>Housing &amp; Employment</b>	
<b>Allocate the Reserve site:</b> Rather than rely on delivery of housing at Bradford on Avon from small sites, the reserve site should be included as an allocation for approximately 120 dwellings. This is supported in the SHELAA. The site has capacity exceeding the allowance from small sites, which is currently being relied on, to ensure the overall targets associated with the spatial distribution are achieved. The representor has made suggested changes to the policy to address their comments.	Cala Homes (Thames) Ltd.
<b>Transport/ Traffic/ Infrastructure</b>	

Key issues raised (Policy 57 - Bradford on Avon Market Town)	Respondent(s)
<b>Restricted vehicular access</b> : There is restricted vehicular access to the site and the topography steep. Capacity of the adjoining 1940s housing estate is limited and there will be a negative impact on the local road network and increased traffic in the town, traffic congestion and air quality issues.	Individuals x10; Bradford on Avon LHFIG & Bradford on Avon Town Council Sustainable Travel Committee.
<b>Traffic safety concerns:</b> The site's development would result in safety concerns in the 20 mile per hour neighbourhood zone already in place and result in increased traffic.	Individuals x10.
<b>Costs associated with roads to service the Reserve Site:</b> New roads will attract further costs for maintenance rather than utilising smaller development adjacent to existing infrastructure.	Individuals x10.
<b>Poor pedestrian linkage to the town:</b> The site is not easily accessible by foot and routes into the town are over difficult terrain unless following the road, therefore forcing people to use unsustainable modes of travel and reliance on the car.	Individuals x10.
<b>Proximity to an existing play area:</b> The boundary of the site currently includes the St Aldhelm play area (immediately to the west of Mythern Meadow). This should not be developed for housing.	Individuals x10.
<b>Infrastructure provision in the SA is a subjective:</b> The assessment of infrastructure provision for the reserve site (page 25 of the SA) as only having a minor adverse effect, is a subjective opinion. GP wait times are very long, with existing poor healthcare services. Development of the site will have a major impact on recreational use (by dog walkers). The requirement for additional educational places has not been evidenced as to how this may be achieved.	Individuals x10.
<b>Biodiversity/ Landscape/ Ecology (including Bats)</b>	
<b>Deliverability of Biodiversity Net Gain:</b> It is questioned whether the site can deliver the necessary biodiversity net gain.	Bradford on Avon Town Council; Individuals x10.
<b>Retention as a blue/green biodiverse corridor and accessible green space:</b> This much valued open space and green-blue biodiverse corridor must be protected and enhanced. It is important for walkers; a much loved local green space and an important wildlife habitat for birds, butterflies, bats, otters, beavers, river birds, badgers and a variety of plants. No ecological studies have been carried out in recent years. The site has re-wilded and is a diverse ecosystem and thus a huge carbon sink aiding with the climate emergency. A proper assessment hasn't occurred.	Bradford on Avon Town Council; Bradford on Avon LHFIG & Bradford on Avon Town Council Sustainable Travel Committee; Individuals x100.
<b>The importance of the site for the bat population:</b> Bradford on Avon doesn't have a bat mitigation strategy, despite its key location within the impact zone for the Special Area of Conservation (SAC). The site is within trigger distances of the hibernation and maternity roosts of bat species protected by the SAC and has a number of rare bat species (Greater and Lesser Horseshoe and Bechsteins) as well as maternity roosts on the site.	Individuals x10.

Key issues raised (Policy 57 - Bradford on Avon Market Town)	Respondent(s)
The SA identifies flight lines for bats. Other sites (Site 2) were disregarded due to <i>inter alia</i> the presence of bats. The impact on bats has not been sufficiently considered in the allocation of this reserve site. It is essential that an 'Appropriate Assessment' of bat habitats is undertaken.	
<b>The scale of development should reflect the site's wildlife/ ecological/ environmental importance:</b> The River Avon corridor, that the site sits within, is especially important for rare bats protected as part of the Bath and Bradford on Avon Bats SAC, as well as forming an important green corridor or for other environmental and landscape interests and so the scale of development envisaged, may not be possible.	Natural England.
<b>Protection of the Avon Valley Site of Outstanding Beauty:</b> The river to the west of Bradford on Avon is part of the Avon Valley Site of Outstanding Beauty and should be protected, forming a green corridor east/west through Bradford on Avon.	Individuals x10.
<b>The site is more suitable as a country park:</b> This site would be more suited as a country park, to be used for educational purposes, providing a much-loved nature trail, linking directly to the town centre.	Individuals x10.
<b>The site should be an allocated Recovery Area:</b> In terms of the Environmental Act and review being undertaken by Natural England on recovery areas, the site should be allocated as a nature recovery area, adding it to the national green and blue network.	Individuals x10.
<b>Assessment of biodiversity within the SA:</b> Query the assessment of biodiversity of this site within the SA. The reserve site is more biodiverse than Site 2, which was excluded on biodiversity grounds.	Bradford on Avon LHFIG & Bradford on Avon Town Council Sustainable Travel Committee.
<b>Development is inconsistent with the objectives of emerging Policy 57:</b> The site conflicts with the requirements of Policy 57 in relation to i) Criterion 3 (Improving Air Quality) – the addition of a large housing development would not reduce traffic impacts on the town but increase them, and ii) Criterion 7 (Addressing the Climate emergency) - the site hosts notable biodiversity and provides a significant ecosystem service to inhabitants.	Individuals x10.
<b>Contamination/ Landfill</b>	
<b>Contamination and landfill history:</b> The site is an historic landfill site and thus contaminated, with stability issues. Development would require the removal of rubbish including asbestos and heavy metals, posing a risk of river pollution, which raises viability concerns and specifically, the deliverability of affordable housing.	Individuals x10; European Property Ventures (Wiltshire).
<b>Need for a land contamination assessment and (possible) remediation:</b> Owing to the site's former landfill site status, mitigation requirements should be included in the policy regarding a land contamination assessment, and if required remediation of the site prior to any development coming forward.	Environment Agency.

Key issues raised (Policy 57 - Bradford on Avon Market Town)	Respondent(s)
<p><b>The SA does not consider the former landfill use:</b> The SA states the site is greenfield and ‘<i>appears not to have been developed</i>’ and ‘<i>land contamination is unlikely</i>’. The site was a former landfill site until the 1970s. Contamination is very likely to be evident. This is an error in the assessment and contradicts the ‘<i>Planning For Bradford on Avon</i>’ document which does note this former use.</p>	Individuals x10.
<p><b>Flooding/ Water</b></p>	
<p><b>Contaminated groundwater:</b> Surveys have shown contaminated groundwater from the previous landfill beneath the site.</p>	Individuals x10.
<p><b>Flood risk:</b> The site includes areas of land contained with Flood Zones 2&amp;3. The site should only be included if it has passed the sequential test.</p>	Environment Agency.
<p><b>The impact of development on the river:</b> Concern is expressed about the impact of development on the riverbank and river both during and after construction.</p>	Individuals x10.
<p><b>Increase in surface water run-off/ flood-related constraints:</b> Development will increase surface water run-off, raising water levels for Bradford on Avon and further downstream, overwhelming the sewage system and leading to more sewage overflows in the River Avon. The site could be allocated for flood mitigation, particularly considering changing weather as a result of climate change.</p>	Individuals x10.
<p><b>Planning for Bradford on Avon</b></p>	
<p><b>The Reserve site's location within the green belt:</b> Page 25 notes sites were discounted as they were in the green belt. The reserve site is in the greenbelt. Question why this site was also not discounted.</p>	Individuals x10.
<p><b>Flood risk, contamination and stability issues:</b> Page 29 notes flood risk, contaminated land and land stability issues associated with the site, given it was a former landfill site but that there are currently insufficient reasons to discount the site. The three reasons listed are reason enough. The golf course site should have been discounted at Stage 2.</p>	Individuals x10.
<p><b>Traffic-related problems:</b> The SA acknowledges that access and public transport links to the site are poor. Developing this site will result in increased car traffic, which Bradford on Avon can not cope with.</p>	Individuals x10.
<p><b>The assessment of constraints is insufficiently robust:</b> Potential development sites were assessed against only 5 criteria. These did not allow for the contamination issue to be suitably assessed. The site also scored ‘Amber’ for traffic and accessibility however the assessment of accessibility was to proximity rather than physical access or route. No further evidence is provided that details how constraints identified can be suitably addressed or mitigated. The LPR does not provide an appropriate or evidence-based strategy.</p>	European Property Venture (Wiltshire) .

Key issues raised (Policy 57 - Bradford on Avon Market Town)	Respondent(s)
<b>Duty to Cooperate</b>	
<b>Co-operation with the Local Nature Partnership has not occurred:</b> Required to cooperate with the Local Nature Partnership to deliver biodiversity net gain in accordance with the Environment 2 Localism Act 2014. This has not occurred.	Individuals x10.
<b>Co-operation with Public Health/ NHS England has not occurred:</b> No cooperation with regard to providing green spaces and opportunities for people to connect with nature for their own health and wellbeing. The site is important for walking & wild swimming. The site keeps local people healthy & less reliant on existing overstretched healthcare providers.	Individuals x10.
<b>Green &amp; Blue Infrastructure Strategy</b>	
<b>Breach of the Green &amp; Blue Infrastructure Strategy:</b> Allowing development of the Reserve site will lead to biodiversity loss and impact on wildlife plus the removal of an essential connection between the Strips Woodland, Widbrook Wood and the natural strategic blue and green corridors along the River Avon. This is in direct breach of the Green & Blue Infrastructure Strategy.	Individuals x10.
<b>Bat Special Areas of Conservation (SAC) Planning Guidance for Wiltshire Report</b>	
<b>Breach of the Bat Special Areas of Conservation (SAC) Planning Guidance for Wiltshire Report:</b> This report notes the site as providing 'strips' connecting the site and Widbrook Wood as being vital for supporting bats which are a feature of the SAC.	Individuals x10.
<b>Suggested alternative sites</b>	
<b>The Beehive site:</b> The land between the canal and the houses at the top of Trowbridge Road (the Beehive site) is a more reasonable and practical site and would allow for a proportion of the bypass to be built.	Individuals x10.
<b>Redevelop the golf course site for sports facilities, to free-up other sites:</b> The golf course site could be developed for sports facilities, possibly moving the existing facilities at Moulton Grounds, therefore freeing up the land at that site for further development.	Individuals x10.
<b>An alternative site in Trowbridge should be found:</b> Trowbridge has many old industrial buildings which could be turned into low cost housing, regenerating old buildings whilst providing affordable housing.	Individuals x10.
<b>The Football Ground site:</b> This should be included for housing and a new health centre if arrangements can be made to move the pitches to the Beehive Field (off Trowbridge Rd). These are Sites 286, 1044, 3724 on Figure 8 of the 'Planning for Bradford on Avon') or sites off the Bath Road (3121, 3605). Landowner discussions are underway.	Bradford on Avon LHFIG & Bradford on Avon Town Council Sustainable Travel Committee.

Key issues raised (Policy 57 - Bradford on Avon Market Town)	Respondent(s)
<b>The Cemetery Lane site:</b> This may be suitable for housing if the biodiversity issues are handled carefully.	Bradford on Avon LHFIG & Bradford on Avon Town Council Sustainable Travel Committee; Sheppard & Barrow Ltd.
<b>Land North of Leigh Park Road, Bradford on Avon:</b> This should be considered as an alternative site for development.	Vistry Group.
<b>Land to the east of Bradford on Avon, off Trowbridge Road:</b> This site may deliver up to 150 dwellings, which, assuming a 40% affordable housing requirement, would bring about 60 such dwellings, plus football club/ community sports hub, 12 ha country park , park & walk facility, care home, allotments, health care centre and play provision. It is currently excluded solely for the reason it is included within the green belt.	Waddeton Park Ltd.
<b>Bath Road, Bradford on Avon:</b> This site has been promoted to the SHLAA and is considered a suitable site for residential development. Whilst located within the green belt, it is outside the AONB. It a well-contained site and represents a logical extension to the settlement to deliver both market and affordable housing.	European Property Venture (Wiltshire) .
<b>The train station car park/ health centre and swimming pool sites:</b> Opportunity exists to redevelop this area to re-provide these facilities and provide affordable housing above these community facilities. More innovative solutions need to be explored for housing provision rather than resorting to green spaces.	Individuals x10.
<b>Site between the B3108 Bradford on Avon to Winsley and Ashley Lane (adjoining the boundary of St Laurence school campus):</b> Available site put forward (SHELAA Site 287), which is suitable for infrastructure improvements, retail or housing development.	Individuals x10.
<b>Potential site for housing allocation:</b> SHELAA Form received during the consultation period suggesting 60-80 houses could be delivered at Bradford on Avon, as an allocation in the Local Plan by 2038.	Bradford on Avon Sports Club.

Table 5.72 [Policy 58 - Warminster Market Town] key issues

Key issues raised (Policy 58 - Warminster Market Town)	Respondent(s)
<b>Housing</b>	
<b>Housing requirement too low:</b> As a result of the overall housing requirement for Wiltshire needing to be increased, the requirement for Warminster should be increased; A residual of only 40 homes at Warminster, given its status as a Market Town and a focus for growth, does not support the role and function of Warminster nor represent a positively planned approach for this settlement; Warminster is a sustainable location for growth.	Rubix Land Ltd; Backhouse Housing; Hannick Homes; Barratt Homes Bristol.
<b>Reliance on the West Warminster Urban Extension (WWUE):</b> The strategy for Warminster relies too heavily on the delivery of the WWUE, which has been slow to progress, delivering slower than as anticipated by the WCS; there is insufficient justification given to support an expected increase in the rate of delivery of the WWUE; Additional allocations/reserve sites are required at Warminster to reduce reliance on the WWUE.	Bellway Homes; Barratt Homes Bristol.
<b>Neighbourhood planning:</b> The neighbourhood plan should not be relied on to deliver additional site allocations; there is no evidence that a neighbourhood plan review will allocate sites.	Bellway Homes; Barratt Homes Bristol.
<b>Housing requirement:</b> There is contradiction between the residual housing growth figure of 40 units, and the neighbourhood plan requirement of 90 dwellings - this needs to be clarified.	Cranborne Chase Area of Outstanding Natural Beauty.
<b>Commitments:</b> The council's failure to allocate sites with extant planning permissions fails to provide certainty; Planning permission at Damask Way has now lapsed.	Backhouse Housing.
<b>Transport</b>	
<b>Impact of development elsewhere on the strategic highway network:</b> The cumulative impact of planned and committed growth in Trowbridge, Warminster and Westbury, given existing network constraints on the A36 corridor, needs to be fully understood through further review the Transport Evidence Base.	Highways England.
<b>Local highway network:</b> Concern that the Local Plan does not adequately address improvements needed to local highways network in Warminster.	Individuals x10.
<b>Healthcare</b>	
<b>Healthcare infrastructure contributions:</b> A significant level of housing growth is proposed, and a more consistent approach to healthcare infrastructure requirements is needed in the policy through a new bullet point.	Bath and North East Somerset, Swindon and Wiltshire NHS Integrated Care Board.



Key issues raised (Policy 58 - Warminster Market Town)	Respondent(s)
<p><b>Healthcare capacity:</b> Warminster only has one GP surgery, with both capacity issues and staffing issues. The council must make space available in Central Car Park should the surgery wish to expand on that site; Concern that the Local Plan does not adequately address improvements needed to local GP/healthcare infrastructure in Warminster.</p>	<p>Warminster Town Council; Individuals x10.</p>
<p><b>Town centre</b></p>	
<p><b>Brownfield opportunity sites:</b> With regard to bullet point 4 and explanation in Planning for Warminster, Central Car Park is no longer a significant brownfield site - the Old Police Houses have been converted to residential and a planning application is expected for residential units in the Old Police Service Yard. This reduces the amount of brownfield land available in the Central Car Park area. There is a funding gap, compounded by reduced demand for retail due to covid and the shift to online shopping.</p>	<p>Warminster Town Council.</p>
<p><b>Retail:</b> Concern that the Local Plan does not adequately address improvements needed to improve the town centre / retail offer in Warminster</p>	<p>Individuals x10.</p>
<p><b>Flood risk</b></p>	
<p><b>Flood risk:</b> Concern that there are drainage issues along Boreham Road which have not been addressed.</p>	<p>Individuals x10.</p>
<p><b>Amenity</b></p>	
<p><b>Bore Hill Farm biodigester:</b> A bio-waste processing facility is situated at Bore Hill Farm, and Policy 58 should include in its mitigation requirements assessments of potential noise and odour impacts from the adjacent waste processing facilities to inform an appropriate layout and necessary mitigation measures.</p>	<p>Environment Agency.</p>
<p><b>Ecology</b></p>	
<p><b>River Avon Special Area of Conservation:</b> Clause 8 of the policy includes a requirement to “ensure solutions to improve conditions within the River Avon Special Area of Conservation (SAC) are prioritised”. Due to the location of the Warminster waste water treatment works in relation to the town, the provision of phosphorus neutrality measures at Warminster will be particularly difficult, which clause 8 is no doubt intended to reflect. However the current wording is confusing and suggests measures will be possible to “improve” the SAC, whereas in fact achieving phosphorus neutrality (i.e. not making the situation worse) will be a significant challenge in itself for new development. Natural England therefore recommends the policy is reworded to ensure policy support for measures that may come forward that will help to achieve the necessary levels of phosphorus mitigation required for new residential development.</p>	<p>Natural England.</p>

Key issues raised (Policy 58 - Warminster Market Town)	Respondent(s)
<p><b>Nutrient neutrality:</b> Bespoke onsite mitigation can be provided to mitigate for nutrients pollution, and therefore this should not prohibit sites from being allocated at Warminster; The reduction of Warminster NP's requirement on the basis of nutrients constraints will result in identified needs not being met due to a technical consideration that can be overcome.</p>	Barratt Homes Bristol; Rubix Land Ltd.
<p><b>Promotion of Omission sites</b></p>	
<ul style="list-style-type: none"> <li>• 44 &amp; 48 Bath Road (Site 7) [Mr John Ellis]</li> <li>• Land at Ashley Coombe and Fanshaw Way (Site 3 and Site 10) [Rubix Land Ltd]</li> <li>• Land at Damask Way (SHELAA sites 606 and 236) [Backhouse Housing]</li> <li>• Land north of Boreham Road/Land east of The Dene (Part of Site 2/SHELAA site 603) [Bellway Homes]</li> <li>• Land part of WWUE (SHELAA site 743) [Hannick Homes]</li> <li>• Land off Westbury Road (Site 9/SHELAA site 793) [Barratt Homes Bristol]</li> </ul>	Mr Jon Ellis; Rubix Land Ltd; Backhouse Housing; Bellway Homes; Hannick Homes; Barratt Homes Bristol.
<p><b>Settlement Boundary Review</b></p>	
<p><b>Settlement boundary review required:</b> Given the length of the plan period to 2038, a settlement boundary review should take place through the Local Plan process.</p>	Durmast Ltd.
<p><b>Inclusion of site within the settlement boundary:</b> Land at Grovelands Way (SHELAA site 1007) has planning permission and work has commenced – the site should be included within the settlement boundary, under the settlement boundary methodology.</p>	Durmast Ltd.
<p><b>Inclusion of committed sites within the settlement boundary:</b> Settlement boundaries should be amended to include all allocations and commitments, in order to provide greater clarity and certainty over delivery.</p>	Barratt Homes Bristol.

Table 5.73 [Policy 59 - Land at Brook Street] key issues

Key issues raised (Policy 59 - Land at Brook Street)	Respondent(s)
<b>Policy support</b>	
<b>Policy support:</b> Conditional support for the allocation of the land specified for delivering phosphorus mitigation measures on the River Avon SAC.	Natural England.
<b>Support the need:</b> Support the need for an allocation / phosphate mitigation.	Warminster Town Council; Environment Agency.
<b>Allocation / phosphate mitigation</b>	
<b>How will site mitigation work?:</b> It is unclear how this land can be used for offsetting nutrients when Cannimore Brook which flows through it in a culvert is not subject to sewage outfalls and only rises about a kilometre from Brook Street. Would the land at Brook Street be turned into fenland to absorb water and carbon as an 'offsite' mitigation? Environment Agency outlined that an example of mitigation could be included to improve reader understanding.	Warminster Town Council; Environment Agency.
<b>Flood risk:</b> This land (Brook Street) is in the flood zones and in proximity to an Environment Agency flood storage area. Due to existing flood risk in this area, and properties flooding frequently, there is an opportunity to use this safeguarded land to reduce the flood risk to the community. For example, by re-naturalising the river through this section out of the existing culvert with associated wetland for nutrients. The wording of the policy must ensure that this flood risk ambition is not compromised by the delivery of the nutrient mitigation.	Environment Agency.

Table 5.74 [Policy 60 - Westbury Market Town] key issues

Key issues raised (Policy 60 - Westbury Market Town)	Respondent(s)
<b>Scale of growth</b>	
<p><b>Increase housing growth at Westbury to match an extended Plan Period:</b> Acknowledge adjustments in Local Housing Need Assessment (LHNA) calculations but propose extending the Draft WLP period to 20 years, increasing housing need. Call for flexibility in housing numbers and amending the plan period to 2020-2040, providing approximately 1,820 homes. Propose 40,840 dwellings based on LHNA over a 20-year plan period. Plan for higher job growth and include an additional 10-20% buffer to boost housing supply.</p>	Land Value Alliance; Hills Homes.
<p><b>Increase housing growth at Westbury to support surrounding rural areas:</b> The current growth strategy may not sufficiently address housing needs in rural areas. Therefore, it's suggested to revise the growth strategy to increase housing distribution to rural areas, with additional capacity at Westbury, balancing development, and meeting housing needs in both urban and rural areas.</p>	Assetsphere.
<p><b>Increase housing growth at Westbury to match Core Strategy rates:</b> The plan's housing requirement is lower than the current requirement in the adopted Core Strategy. It's suggested to extend the plan period to 2041, increasing housing provision and matching rates of growth achieved since the adoption of the extant Core Strategy. The plan should provide a minimum of 45,507 dwellings, with the Trowbridge Housing Market Area (HMA) accommodating an additional 2,060 dwellings.</p>	Robert Hitchins.
<p><b>Increase housing at Westbury and support it with additional infrastructure:</b> Support Westbury's designation as a Market Town and suggest increasing the Local Plan Housing Requirement. The town needs additional infrastructure and faces growth constraints.</p>	Taylor Wimpey Strategic Land.
<p><b>Increase housing growth at Westbury due to lack of constraints:</b> The current housing growth target is 1,400 homes, with a residual requirement of 570 homes. The Strategic Assessment (SA) suggests increasing the provision at Westbury. The Reg 18 Plan's target of 1,820 homes could be increased due to the town's unconstrained nature. For example, Westbury is not significantly constrained in environmental terms and has a strong concentration of employment. The land to the east of Westbury (where the site is located) is not shown to have any constraints. Land to the west and north is shown to be constrained due to areas of flood risk. The reduction at the Reg 19 stage reflects the overall reduced housing requirement.</p>	White Horse Country Club; Castlewood Venture Partnerships.
<p><b>Increase housing growth at Westbury as housing allocation is below historic delivery rates:</b> Westbury's housing allocation is lower than the number of dwellings already delivered, a strategy of significant restraint in housing proposals for Market Towns, and the need for additional infrastructure investment in Westbury.</p>	Barwood Land; Hills Homes.

Key issues raised (Policy 60 - Westbury Market Town)	Respondent(s)
<p><b>Increase housing growth at Westbury because of its status within the Settlement Strategy:</b> Westbury is recognised as a Market Town with significant potential for growth until 2038. This is consistent with Policy 1 (Settlement Strategy) and is supported.</p>	<p>Persimmon Homes Wessex; Castlewood Venture Partnerships.</p>
<p><b>Increase housing growth at Westbury to align with the ‘Emerging Spatial Strategy’ consultation (2021):</b> The ‘Emerging Spatial Strategy’ consultation proposed that Westbury would provide 1,820 homes over the 20-year plan period (2016-2036), which equates to 91 dwellings per annum. This represents an uplift when compared to the Wiltshire Core Strategy requirement of 1,500 homes (75 dwellings per annum). However, the revised spatial strategy proposes to reduce the level back closer to that set out in the Wiltshire Core Strategy.</p>	<p>Persimmon Homes Wessex; Land Value Alliance.</p>
<p><b>Object to lower scale of growth at Westbury resulting from drop in overall housing requirement for Trowbridge HMA:</b> Paragraph 4.171 of the Revised Spatial Strategy paper explains that Trowbridge and Westbury are the settlements where a reduction in the forecast housing need <i>should be passed on in terms of lower proposed scales of housing</i>. It is something of a self-serving prophecy whereby arbitrarily reducing the length of the plan period triggers a reduction in the overall headline housing requirement. This approach both at the strategic level and its implications for individual Housing Market Areas and settlements within it, including Westbury is not supported.</p>	<p>Persimmon Homes Wessex.</p>
<p><b>Potential for further growth</b></p>	
<p><b>Lack of constraints and strong employment base:</b> The draft Local Plan includes Westbury in the Trowbridge Housing Market Area due to its close relationship with Trowbridge. Westbury, not significantly environmentally constrained and with a strong employment base, has significant development potential.</p>	<p>Gleeson Land.</p>
<p><b>Existing services and facilities:</b> The town centre is the hub for retail and services, supporting the growing town. As a Market Town, Westbury has potential for significant development, increasing jobs and homes.</p>	<p>Gleeson Land.</p>
<p><b>Infrastructure investment required:</b> However, growth needs to be balanced with infrastructure and community services investment. Traffic and air quality issues, particularly on the A350, require attention. Funding contributions are needed for the Westbury Transport Strategy and a new bus service.</p>	<p>Gleeson Land.</p>
<p><b>Neighbourhood planning</b></p>	
<p><b>Local Plan and neighbourhood plan synergy:</b> Update the Westbury Neighbourhood Plan to accord with the Wiltshire Local Plan. The Westbury Neighbourhood Plan will need to be updated to accord with the Wiltshire Local Plan once a sound basis for the housing strategy has been provided.</p>	<p>Hills Homes.</p>

Key issues raised (Policy 60 - Westbury Market Town)	Respondent(s)
<p><b>Ensure neighbourhood plans deliver their housing requirements:</b> Implement a mechanism to ensure that the housing growth required will be delivered through the Neighbourhood Plans. If additional provision is to be added to the housing requirement to be met through the Westbury Neighbourhood Plan, there needs to be a mechanism to ensure that the housing growth required will be delivered through the Neighbourhood Plans.</p>	Hills Homes.
<p><b>Over-reliance on neighbourhood plans:</b> The Westbury Neighbourhood Plan is relied upon to meet the housing requirement.</p>	Robert Hitchins.
<p><b>Reflect neighbourhood plan allocations:</b> Suggest expanding Site 5 in the Allocations to include Site 4 and updating the plan to reflect the latest allocations in the Westbury Neighbourhood Plan.</p>	Westbury Town Council.
<p><b>Healthcare</b></p>	
<p><b>Healthcare funding:</b> The NHS is under significant funding constraints, exacerbated by population growth from new housing developments. New developments should contribute proportionately to healthcare funding. National policy expects development proposals to mitigate their impact on local infrastructure. A consistent approach to identifying healthcare infrastructure needs would improve Area Strategies. Proposed policy modification includes provisions for funding contributions towards healthcare.</p>	NHS Bath and North East Somerset; Swindon and Wiltshire Integrated Care Board.
<p><b>Leisure and tourism</b></p>	
<p><b>Cotswold Lakes:</b> These lakes are seen as a potential major tourist attraction and should be maintained as a strategic site. Implementing the WSS strategy could initiate this development, but it requires additional investment for maximum community benefit. There's also a need to reduce transport usage. Incorporating local indoor rowing into the WSS strategy could help reduce transport usage and stimulate new interest.</p>	Wiltshire Scullers.
<p><b>Transport</b></p>	
<p><b>Impact on strategic road network:</b> Development in Trowbridge, Warminster, and Westbury could impact the A36 trunk road. National Highways seeks to understand the cumulative impact of growth in these areas. A Transport Evidence Base document summarises strategic traffic modelling work for the Local Plan Review. National Highways suggests demonstrating potential traffic flow impacts and assessing risks around capacity improvements at M4 J17. They have reviewed the Wiltshire Local Plan Review and consider the scale of planned growth not significantly increased. However, potential cumulative impacts for the Strategic Road Network (SRN) are not sufficiently evidenced.</p>	National Highways.
<p><b>Regional transport plan:</b> The draft Local Plan lacks a regional Transport Plan, leading to irrelevant proposals.</p>	Westbury Town Council.

Key issues raised (Policy 60 - Westbury Market Town)	Respondent(s)
<p><b>Pedestrian safety at Station Road:</b> Issues on Station Road include vehicles exceeding the speed limit, heavy traffic, pedestrian safety concerns, noise and air pollution, and lack of zebra crossings. These issues are exacerbated by parked cars and children crossing at non-designated areas due to nearby schools. Suggested changes include implementing a 20mph speed limit, installing speed bumps and zebra crossings, and using vehicle-activated speed signs. These changes could improve pedestrian safety and reduce noise pollution, addressing points in Policy 60.</p>	Individuals x10.
<p><b>HGVs:</b> Westbury is grappling with traffic issues due to increased car use and inadequate road infrastructure. There's a need for a Westbury bypass and better access for heavy goods vehicles (HGVs) to the Westbury Trading Estate. Current attempts to build the eastern route are insufficient. Suggested changes include building a western bypass linking key areas, creating a viable HGV route, and stopping the construction of the eastern route. These changes could improve air quality, ease commuter woes, and prevent HGVs from using local streets.</p>	Individuals x10.
<b>Landscape</b>	
<p><b>Impact of development on AONB:</b> The proposed development of 570 units in Westbury could exert pressure on the nearby Area of Outstanding Natural Beauty (AONB). To mitigate this, the AONB Partnership suggests that the Local Plan should require the development to contribute compensation to the AONB, helping to offset any potential impact.</p>	CCWWD AONB.
<b>Heritage</b>	
<p><b>Treatment of historical buildings:</b> In 2012, Wiltshire Council demolished a rare 15th-century building in Westbury, a decision contrary to its own policy. The building, which had potential for use as affordable homes, was not assessed for historical significance before demolition. The council prioritised car use over preservation of the historical structure. Changes suggested include aligning council decisions with policies, assessing buildings for historical significance before demolition, repurposing rather than demolishing potential community-use buildings, and balancing modern needs with preservation of historical structures.</p>	Individuals x10.
<b>Consultation process</b>	
<p><b>Collaboration with town council:</b> Westbury Town Council seeks more collaboration in site selection.</p>	Westbury Town Council.
<p><b>Form not user-friendly:</b> User-unfriendliness of the form and uncertainty about its legality. Suggested changes include improving the form's user-friendliness and providing legal clarity.</p>	Individuals x10.
<b>Omission sites</b>	

Key issues raised (Policy 60 - Westbury Market Town)	Respondent(s)
<ul style="list-style-type: none"> <li>• Westbury Cement Works [Tarmac]</li> <li>• Land at Brook Farm, Brook Lane [Hills Home]</li> <li>• Glenmore Farm [Land Value Alliance]</li> <li>• Land at Shallow Wagon Lane [PlanningSphere]</li> <li>• Land between Mill Brook and Coach Road [Robert Hitchins]</li> <li>• Land at Slag Lane [PlanningSphere]</li> <li>• Land at Meadow Lane [White Horse Country Club]</li> <li>• Land West of Hawkeridge [Taylor Wimpey Strategic Land]</li> <li>• Land North of Newtown [Gleeson Land]</li> <li>• Land South of Sandhole Lane [Gleeson Land]</li> <li>• Land to the South of Westbury [Barwood Land]</li> </ul>	<p>Tarmac; Hills Homes; Land Value Alliance; Robert Hitchins;</p> <p>PlanningSphere; White Horse Country Club Ltd; Taylor Wimpey Strategic Land; Gleeson Land; Barwood Land.</p>



**Table 5.75 [Policy 61 - Land West of Mane Way, Westbury] key issues**

Key issues raised (Policy 61 - Land West of Mane Way, Westbury)	Respondent(s)
<b>Development size/ area</b>	
<p><b>Quantum:</b> The overall size of development should be increased to approximately 340 dwellings. This proposed size of development is based on a high-level assessment which our representations conclude fails to consider in sufficient detail the constraints and opportunities at this site. The Vision Document submitted in support of our representations demonstrates that has the capacity to accommodate approximately 340 dwellings.</p>	Persimmon Homes Wessex.
<p><b>Area:</b> The extent of the allocation area should be updated to accurately reflect Persimmon’s land holdings, as set out in their Vision Document. The physical extent of the area which forms the allocation identified in Policy 61 and is set out on the Policies Map, does not accord with land which has been promoted by Persimmon Homes (Wessex) Ltd. The extent of land proposed to be allocated at Policy 61 does not align with Persimmon’s land control and appears to omit a triangular section of land at the southern edge, adjacent to Mane Way.</p>	Persimmon Homes Wessex.
<b>Concept plan/ masterplan</b>	
<p><b>Masterplan delivery:</b> The requirement to submit and have as an ‘approved’ a comprehensive masterplan in advance of any planning application is not justified. There is no mechanism through which a masterplan can be formally ‘approved’ outside of the planning application process. It represents a potentially unworkable requirement placed on proposals which could ultimately result in delay to delivery. This requirement also fails to acknowledge circumstances where a site is under single ownership.</p>	Persimmon Homes Wessex.
<p><b>Concept plan:</b> Persimmon strongly object to the inclusion of the Concept Plan (Figure 4.45) in the development plan policy, particularly within the wording of Policy 61. The requirement that proposals must adhere to the principles shown within the Concept Plan is unjustified, as it elevates the Concept Plan to policy status. The Concept Plan, which is intended to illustrate “how the site may be developed”, should not be treated as determinative. It is not justified to pre-determine the comprehensive planning of a development during the preparation of a planning application. The Concept Plan could potentially constrain development based on a level of site-specific assessment that is less detailed than what would be obtained through the preparation of a planning application. The Concept Plan is very specific on certain matters, such as retaining ~3.27ha of land as open space to preserve the setting of the Scheduled Monument and a 50m buffer to the Moat and setting. However, the master planning of the site has evolved further, based on detailed site-specific assessments and technical surveys. A Vision document has been produced as part of the representations to this Local Plan consultation, and it is expected that available evidence to inform scales of development would be used appropriately. The Concept Plan presented in the Local Plan could act as an artificial basis upon which higher levels of development would be considered. Therefore, the reference to the Concept Plan within the wording of Policy 61 should be deleted.</p>	Persimmon Homes Wessex.

Key issues raised (Policy 61 - Land West of Mane Way, Westbury)	Respondent(s)
<b>Lack of detail:</b> The current master plan lacks detail and it's unclear how many phases of building there will be. This aspect of the plan needs to be made SMART (Specific, Measurable, Achievable, Relevant, Time-bound).	Individuals x10.
<b>Labelling of flood zones:</b> The concept plan is misleading. A green area identified as flood zone 2 should be correctly labelled as flood zone 3, which indicates high risk.	Environment Agency.
<b>Transport</b>	
<b>Safeguarding land for railway bridge:</b> There is an inconsistency between the policy requirement of safeguarding land and supporting text (paragraph 4.317) which refers to 'contributions' in addition to the safeguarding of land. There is no consideration of the viability implications arising from the provision of land and contributions. Development at Mane Way can support the future delivery of a road bridge by safeguarding land. Paragraph 4.317 states that: "The site will provide additional homes over the plan period and facilitate a railway bridge extending Mane Way across the railway line through the provision of land and contributions. The site benefits from reasonably good levels of accessibility, albeit improvements will be required to improve opportunities for sustainable transport choices." The delivery of the road bridge is a strategic matter for the local planning / highways authority and subject to viability and feasibility assessments. However, the provision of land and contributions poses a genuine risk as to the viability of development at the Policy 61 site as the funding gap has not been adequately assessed by the Council.	Persimmon Homes Wessex.
<b>Infrastructure Delivery Plan:</b> The provision of a road rail bridge is not listed within the 'transport' infrastructure projects for Westbury. The Infrastructure Delivery Plan (IDP) should be updated to include this essential infrastructure at Westbury and ensure appropriate contributions from development sites at Westbury are secured.	Persimmon Homes Wessex.
<b>Lack of detail about railway bridge:</b> The plan should provide more details about the access across the railway line to the north of Mane Way. Insufficient detail is given to access across the railway line to the north of Mane Way.	Westbury Town Council.
<b>Retention of public rights of way:</b> As an allocated site required to meet identified housing needs, the development of this greenfield site will impact upon existing Public Rights of Way and their current alignment. The preservation of Public Rights of Way is the correct approach, but this must recognise that to facilitate development some diversions of existing routes may be required.	Persimmon Homes Wessex.
<b>Pedestrian safety:</b> With the influx of more residents into Westbury, there is a strong need for pedestrian lights on Mane Way at the Doctors Surgery. This is a necessary safety measure that should be implemented.	Individuals x10.
<b>Landscape</b>	

Key issues raised (Policy 61 - Land West of Mane Way, Westbury)	Respondent(s)
<b>Water meadows requirement:</b> Without specific evidence in respect of ‘water meadows’ this requirement should be deleted from Policy 61 and considerations related to biodiversity should be addressed through Policy 88 (Biodiversity and Geodiversity). The basis for the specific reference to ‘water meadows’ is not adequately justified or explained. There is concern that this policy requirement places a burden on developer to undertake such assessments without any specific rationale.	Persimmon Homes Wessex.
<b>Water meadows assessment:</b> Support assessment of water meadow extent across site. Output should inform concept/master plan.	Natural England.
<b>Heritage</b>	
<b>Moated site:</b> There appears to be a potential opportunity to positively respond to affected assets and secure a sustainable future for the moated site. This needs to be explored further.	Historic England.
<b>Heritage Impact Assessment:</b> It is unclear if an HIA has been undertaken. This is a crucial step in understanding the potential impacts on the heritage assets.	Historic England.
<b>Local Authority Heritage Expertise:</b> The view of the local authority heritage expertise on the proposed caveats to minimise harm and optimise a positive response is not mentioned. Their input is essential in ensuring the protection and enhancement of heritage assets.	Historic England.
<b>Ecology</b>	
<b>Quantum of GBI:</b> 17.7ha of green and blue infrastructure is a minimum requirement for site.	Natural England.
<b>BAT SAC:</b> Support Bath and Bradford on Avon Bats Sac requirements, including protection of core habitat on-site and mitigation to be informed by TBMS.	Natural England.
<b>Biss Brook:</b> During the Westbury Incinerator Planning Inspector’s hearing, it was mentioned that Biss Brook would be used as a water source for firefighting in case of a fire at the Westbury Incinerator. It’s unclear if this has been considered during the planning process for this development.	Individuals x10.
<b>Flooding</b>	
<b>Flood risk:</b> The policy barely mentions flood risk, similar to Policy 55. This is a significant issue that needs to be addressed.	Environment Agency.
<b>Sequential test:</b> The site should only be included if it has passed the Sequential Test. This is a prerequisite for considering the site for further development.	Environment Agency.

Key issues raised (Policy 61 - Land West of Mane Way, Westbury)	Respondent(s)
<p><b>Site-specific flood risk assessment:</b> Following the Sequential Test, the area of the site suitable for residential uses can only be determined by an appropriate site-specific flood risk assessment. This assessment is crucial for ensuring the safety and sustainability of any potential residential development.</p>	Environment Agency.
<p><b>Environmental protection</b></p>	
<p><b>Noise, dust, odour, and pest impact assessments:</b> Persimmon do not object to the rationale behind this policy requirement. However, the wording implies that matters related to noise, dust and odour and pest impacts are the key considerations when developing a layout for the site. This is clearly not the case and such matters for part of the wider considerations when preparing a development scheme.</p>	Persimmon Homes Wessex.
<p><b>Air quality:</b> As worded the reference to ‘funding contributions’ is not defined and creates uncertainty and unknown costs implications. Such contributions should be based on evidence and satisfy the relevant statutory tests and not be double-counted with any CIL related payments.</p>	Persimmon Homes Wessex.
<p><b>Westbury SANG</b></p>	
<p><b>Impact of site on Pickett and Clanger Woods:</b> Without specific evidence to demonstrate impact arising from development at the Policy 61 site on Pickett and Clanger Woods this should be deleted from the policy wording. Paragraph 4.324 of the Local Plan explains that the role of the Country Park (Policy 63) “is to provide alternative green space to prevent an increase in visitor pressure and divert visitors away from both Pickett and Clanger Woods to the north of Westbury”. It is not adequately explained whether the proposed allocation at West of Mane Way falls within the Zone of Influence (ZOI) for Clanger Pickett and Clanger Woods. In the Sustainability Appraisal (Annex 2.15), the potential for increased recreational pressure at Pickett and Clanger Woods was not identified. The basis for SANG provision should be clarified within the Local Plan and contributions/provisions for SANG based on an evidence base that identifies any increased recreational demand pressures arising from development at Policy 61.</p>	Persimmon Homes Wessex.
<p><b>Provision of on-site POS:</b> Requirement is considered unnecessary in any event in light of measures included within Policy 88 (Biodiversity and Geodiversity). Moreover, no consideration is given to the level of on-site Public Open Space and how such provision provides mitigation against increased recreational pressures on sensitive sites. In the case of Land West of Mane Way, extensive areas of open space and recreation will provide alternative recreation opportunities that can limit visitors to Pickett and Clanger Woods.</p>	Persimmon Homes Wessex.
<p><b>Utilities</b></p>	

Key issues raised (Policy 61 - Land West of Mane Way, Westbury)	Respondent(s)
<b>Off-site reinforcement:</b> Reference to ‘moderate’ and ‘significant’ off-site infrastructure should be deleted as it adds a perceived level or scale of contributions which can only be determined based on evidence and detailed understanding of what infrastructure improvements are necessary and relate directly to development on land west of Mane Way.	Persimmon Homes Wessex.
<b>Education/ healthcare</b>	
<b>Referencing provision:</b> It is questionable as to whether specific reference to education/healthcare provision is required as this forms part of the infrastructure requirements which are covered by Policy 5 (Securing infrastructure from new development)	Persimmon Homes Wessex.
<b>Policy wording changes</b>	
<b>Suggest revised wording to paragraph 2 of policy text:</b> <i>[Alternative policy wording suggested by representor]</i>	Persimmon Homes Wessex.
<b>Suggest revised wording to bullet point 6 of policy text:</b> <i>[Alternative policy wording suggested by representor]</i>	Persimmon Homes Wessex.
<b>Delete paragraph 4.371.</b>	Persimmon Homes Wessex .
<b>Suggest revised wording to bullet point 11 of policy text:</b> <i>[Alternative policy wording suggested by representor]</i>	Persimmon Homes Wessex.
<b>Suggest revised wording to bullet point 13 of policy text:</b> <i>[Alternative policy wording suggested by representor]</i>	Persimmon Homes Wessex.
<b>Suggest revised wording to bullet point 14 of policy text:</b> <i>[Alternative policy wording suggested by representor]</i>	Persimmon Homes Wessex.
<b>Suggest revised wording to bullet point 15 of policy text:</b> <i>[Alternative policy wording suggested by representor]</i>	Persimmon Homes Wessex.

Table 5.76 [Policy 62 - Land at Bratton Road, Westbury] key issues

Key issues raised (Policy 62 - Land at Bratton Road, Westbury)	Respondent(s)
<b>Support for policy</b>	
<b>Support in principle:</b> Barratt Bristol strongly supports the principle of the allocation of land in Policy 62 of the Pre-Submission Draft Local Plan (DLP). They believe the site is suitable and sustainable for residential development and will contribute positively to the Place Shaping Priorities for Westbury. However, they consider some elements of the proposed policy to be unjustified, ineffective, and unsound.	Barratt Bristol.
<b>Full support:</b> Manor and Auckland Farm fully supports the proposed inclusion of its site in the draft allocation under Policy 62 of the Regulation 19 of the iteration of the Wiltshire Local Plan Review. The subject site would logically form a first phase of the draft allocation and has a capacity to accommodate up to 41 dwellings.	Manor and Auckland Farm.
<b>Scale of growth</b>	
<b>Allocate further housing:</b> The plan is not positively prepared to provide residential allocations to meet the Council's identified housing need. The Local Plan should allocate further sites to ensure delivery of the housing need as set out in the Plan.	Castlewood Venture Partnerships.
<b>Lack of justification:</b> The plan is flawed in terms of justification for housing and growth targets and delivery.	White Horse Country Club.
<b>Distribution of growth:</b> More growth should be directed towards market towns and rural areas.	Manor and Auckland Farm.
<b>Site selection process</b>	
<b>Inconsistency between Regulation 18 and Regulation 19:</b> Barwood Land objects to the allocation of a previously discounted site. They suggest reconsidering the allocation and providing clear reasons for changes in site selection. The 2023 assessment's discounting of 'Site 6', previously highlighted for further assessment, is questioned. They call for transparency in the site selection process and clarity in the Regulation 19 Plan's evidence base. The lack of transparency between the 2021 and 2023 site selection processes, leading to confusion about the Council's stance on Land at Bratton Road, is also highlighted.	Barwood Land.
<b>Masterplan</b>	
<b>Approval of comprehensive masterplan:</b> Object to requirement for the submission of a comprehensive masterplan for the development to be approved by the Council in advance of the submission of a planning application. There is no statutory scheme for the determination of a comprehensive masterplan and no right of appeal should there be a disagreement between the Council and the applicant(s). A more appropriate approach	Barratt Bristol.

Key issues raised (Policy 62 - Land at Bratton Road, Westbury)	Respondent(s)
would be to require the submission of a comprehensive masterplan alongside the planning application in order that the application proposals can be determined in the context of an understanding of the contribution they make towards delivery of the allocation.	
<b>Joint Memorandum of Understanding:</b> Suggest a joint Memorandum of Understanding between the landowners to enable unfettered access to be provided between the landownerships. The Local Planning Authority will need to satisfy itself that the development of any part of the allocation will neither fetter nor impact upon the viability of delivering the remainder. There is already joint working between the two principal landowners and hence such a requirement is eminently achievable. Such provisions should be incorporated within a Section 106 agreement.	Barratt Bristol.
<b>Concept plan</b>	
<b>Inefficient use of land:</b> The Concept Masterplan inappropriately and unjustifiably excludes a large part of the developable area, making inefficient use of land within the allocated area. This will inevitably lead to the need to allocate additional land for residential development elsewhere.	Barratt Bristol.
<b>Constraints and opportunities not adequately addressed:</b> The current Concept Masterplan is considered to not adequately address the constraints and opportunities of the site. Issues include the incorporation of landscaping enhancements, the density of residential development, the inclusion of land not controlled by the main landowners, the inclusion of an indicative battery storage/renewable energy generation area, and the location of the nursery building.	Barratt Bristol.
<b>Alternative concept plan:</b> An alternative Concept Plan provides a more effective layout for the site while accommodating the necessary mitigation and providing an attractive residential environment. It incorporates landscaping enhancements, appropriate residential density, exclusion of non-controlled land, and relocation of the nursery building.	Barratt Bristol.
<b>Too vague:</b> Ensure detailed and SMART planning before allocating land for future development. There is a risk of allocating land for future development without understanding what that development could be.	Individuals x10.
<b>Westbury SANG</b>	
<b>Lack of landowner agreement:</b> White Horse Country Club, falls within the area proposed as SANG, adjacent to the draft allocation at Bratton Way. The concept plan for Land at Bratton Road includes additional land to the east of the land allocated in the proposals map. The landowner of White Horse Country Club objects to Policies 62 and 63 in their current form as it includes their land for a proposed SANG, without their agreement.	Castlewood Venture Partnerships.

Key issues raised (Policy 62 - Land at Bratton Road, Westbury)	Respondent(s)
<p><b>Support in principle:</b> The client supports the provision of SANG in Westbury in-principle, to be provided for and thereby enable new developments in the town, and the use of part of their site for this use.</p>	<p>Castlewood Venture Partnerships.</p>
<p><b>Alternative development option:</b> A comprehensive development solution is required and there is a more suitable option available. A significant area (about 23%) of the SANG is under the control of the White Horse Country Club. There may be an opportunity to deliver part of the land holding as SANG alongside residential development within the same land holding, which would make the policy deliverable. This would include up to 440 new homes, a small local centre, three points of vehicular access, 6ha of green infrastructure, and a 32.2ha publicly accessible Country Park. This development would provide a sustainable opportunity for the Council to meet their housing needs.</p>	<p>Castlewood Venture Partnerships; White Horse Country Club.</p>
<p><b>Disproportionate requirement:</b> Policy 63 requires the creation of a new Country Park as SANG before the occupation of a dwelling at the strategic allocations at Westbury. This requirement is seen as disproportionate to the scale of development and the mitigation needed. The Trowbridge Bat Mitigation Strategy (TBMS) uses a calculation of 8 ha per 1,000 people for green open space. Using this measure, the total need for SANG for the Bratton Road site would be 4.78 ha, much less than the 27 ha Country Park indicated in Policy 63.</p>	<p>Barratt Bristol.</p>
<p><b>On-site mitigation provision:</b> An alternative plan for the site shows a significant area of public open space to the east of the new homes. This area, along with connections to the wider public rights of way network, is argued to adequately mitigate the recreational pressures from future residents without the need for the Country Park. Therefore, the reference to SANG within Policy 62 is revised and the deletion of Policy 63 is proposed.</p>	<p>Barratt Bristol.</p>
<p><b>Funding:</b> If the Council wishes to deliver a SANG for the existing population, it is suggested that it can do so using Community Infrastructure Levy (CIL) receipts.</p>	<p>Barratt Bristol.</p>
<p><b>Sustainability appraisal</b></p>	
<p><b>Larger area assessed than proposed for development:</b> Despite its draft allocation, the site has been scored poorly in the Sustainability Appraisal in relation to several criteria. The Sustainability Appraisal is considered to not provide a robust, transparent, and fair evaluation of the alternative options available for development. The primary concern is how the site area and proposed land for development has been assessed and the implications of this on the scoring of the site against the Sustainability Appraisal criteria. The assessment within, and conclusion of, the Sustainability Appraisal significantly overstate the number of the negative impacts of development. This is largely due to the evaluation in the Sustainability Appraisal having taken place across a far wider site area than the area of land proposed for development through Policy 62. Much of the additional land to the east, which was included in the Sustainability Appraisal but not the allocation, is more environmentally</p>	<p>Barratt Bristol.</p>



Key issues raised (Policy 62 - Land at Bratton Road, Westbury)	Respondent(s)
sensitive than the area proposed for development. Despite the Sustainability Appraisal of a larger site area than that which is proposed for development, Barratt Bristol notes that there are still no major adverse effects anticipated to arise from the development.	
<b>Alternative assessment:</b> An alternative assessment outputs enhance the site's sustainability scores in several respects. Based on the corrected assessment, the site scores six fewer negatives. This would increase its ranking from joint 6th of the sites assessed at Westbury up to joint first alongside Site 14 (Land at Matravers School).	Barratt Bristol.
<b>Biodiversity</b>	
<b>Bat SAC:</b> The requirements relating to the Bath and Bradford on Avon Bats SAC are supported, including the need for the Trowbridge Bat Mitigation Strategy to apply to new development proposals and inform mitigation.	Natural England.
<b>Sustainability appraisal:</b> The Sustainability Appraisal highlights that the railway line along the northern boundary is a local habitat corridor requiring buffering. However, the proposed allocation in the plan does not extend up to the railway line, so no part of the development would impact the local habitat corridor. Biodiversity net gain on site could be targeted to minimise impacts on bats, newts, and priority habitat. The Sustainability Appraisal gives no 'credit' for the potential of the site to deliver Biodiversity Net Gain, which is a significant opportunity. The site lies within the Trowbridge Bat Mitigation Strategy zones, which represent an increased likelihood of increased recreational pressure and habitat loss. Only the very northern edge of the site assessed through the Sustainability Appraisal falls within the Trowbridge Bat Mitigation Strategy yellow 'medium risk zone', and the area where the allocation is proposed does not. The northern part of the site is within a risk zone and strategic opportunity area for great crested newts. The site contains a significant proportion of grazing land within 1km of the cemetery horseshoe bat roost, which is critical to retaining the population over the winter. Considering the above factors, the site should be scored as having a neutral impact on ecology.	Barratt Bristol.
<b>Policy duplication:</b> The policy has three points dedicated to bat protection, which include enhancing bat habitat, providing mitigation measures, and the provision of SANG in line with Policy 63. The suggestion is to delete these criteria to avoid duplication with Policy 88 on Biodiversity and Geodiversity. The Bratton Road site, which falls outside the high and medium risk zones for bat activity, is argued to not require a specific policy reference.	Barratt Bristol.
<b>Green infrastructure</b>	
<b>Minimum provision:</b> The land indicated as green and blue infrastructure in the concept plan is welcomed, but it is advised that it is expressed as a minimum area of 3.1 ha in the policy wording.	Natural England.
<b>Heritage</b>	

Key issues raised (Policy 62 - Land at Bratton Road, Westbury)	Respondent(s)
<b>Address Sustainability Appraisal concerns:</b> Comprehensively address the concerns raised by the Sustainability Appraisal.	Historic England.
<b>Undertake a Heritage Impact Assessment:</b> If not already done, conduct an HIA and make it available for consideration. It is unclear whether a Heritage Impact Assessment (HIA) has been undertaken and if it is available for consideration.	Historic England.
<b>Use Local Authority heritage expertise:</b> Ensure that all relevant heritage evidence and expertise are considered in the planning judgement. It is uncertain whether additional heritage evidence, including local authority heritage expertise, has informed the planning judgement.	Historic England.
<b>Sustainability Appraisal:</b> The potential for significant adverse effects is moderate/high for heritage and conservation, high for archaeology, but very low for the historic landscape. The heritage impacts of the proposed allocation appear to be significantly overstated in the Sustainability Appraisal. This is largely due to the Sustainability Appraisal assessing development across a larger area than the proposed allocation.	Barratt Bristol.
<b>Setting of Heyward House:</b> Concerns regarding the impact on the setting of Heyward House, a Grade II* listed building, are not justified. The building is a considerable distance north of the proposed allocation and its development would have no impact upon the setting. The policy implies that the development could harm the historic relationship between Heyward House and the Westbury White Horse. However, the potential for harm is substantially lower due to the smaller size and well-landscaped proposed allocation.	Barratt Bristol.
<b>Archaeological remains:</b> The Sustainability Appraisal lists several archaeological features identified on the wider site assessed through the SA or within 100m. The vast majority of these are outside of the area proposed for development and are of low value. There is no reason why these would preclude development of the site, provided suitable archaeological investigations took place. The site is well placed to deliver development as past investigation works have demonstrated with great certainty that there are no critical constraints to development. A minor negative score (at worst) should be attributed to this criterion, considering the above factors.	Barratt Bristol.
<b>Avoid policy duplication:</b> It is suggested that there is no heritage impact necessary to identify through the allocation policy. A development management policy on heritage already exists which applies to all planning applications. To avoid unnecessary duplication between this and the allocation policy, the deletion of this bullet point is proposed.	Barratt Bristol.
<b>Landscape</b>	

Key issues raised (Policy 62 - Land at Bratton Road, Westbury)	Respondent(s)
<p><b>Impact on AONB:</b> While the reference to landscape sensitivity to the south of Westbury and the ridgeline is welcomed, the policy should explicitly reference the proximity of the North Wessex Downs National Landscape and the need for new development to avoid adverse effects to its special qualities.</p>	Natural England.
<p><b>Landscape sensitivity:</b> The Sustainability Appraisal assesses the site to be of generally medium landscape sensitivity to development, with higher sensitivity to the south and east at the base of the ridgeline slopes and beyond the existing substantial tree belt. It concludes that the site has generally medium capacity to accommodate development, with reduced capacity in the south and east of the site. However, this conclusion is intrinsically linked to the scale of the land assessed through the Sustainability Appraisal, particularly the inclusion of the eastern part of the area which is more sensitive to landscape change than the area proposed for development. An assessment of the land proposed for allocation would inevitably arrive at a conclusion that the magnitude of the landscape harm is much lower. However, there inevitably remains some change and so a minor negative is an appropriate score.</p>	Barratt Bristol.
<p><b>Greater landscape sensitivity of the eastern edge of the site:</b> Recognition of the sensitivity of the land to the east of the proposed area for development. The need to retain this area as open and free from residential development, with a low-level nursery building considered appropriate.</p>	Barratt Bristol.
<p><b>Central green gap not justified:</b> Disagreement that current evidence justifies the creation of a substantial green gap in the centre of the site between the northern and southern development parcel. The landscape assessment work identifies no justification for excluding a significant portion of the site simply because it provides a viewpoint to the Ridgeway. The views to the Westbury White Horse are to the southeast of the proposed development area, not south as the current Concept Masterplan suggests.</p>	Barratt Bristol.
<b>Land use</b>	
<p><b>Limited impact on agricultural production:</b> The site has been scored in the Sustainability Appraisal as having a moderate adverse impact due to it being a greenfield site, on land not classified as Best &amp; Most Versatile (BMV), and large. Despite the site being greenfield, the Council has acknowledged that greenfield land is required to meet the housing requirement. Since the site does not comprise BMV, it should be considered in a preferable position relative to other land which would have a greater impact on agricultural production. The proposed allocation is much smaller than the area assessed through the Sustainability Appraisal, which means the magnitude of the impact would reduce. Therefore, the score should be reduced to a minor negative accordingly.</p>	Barratt Bristol.
<b>Air quality/pollution</b>	

Key issues raised (Policy 62 - Land at Bratton Road, Westbury)	Respondent(s)
<p><b>Air Quality Monitoring Area:</b> The presence of an Air Quality Monitoring Area has led to the Sustainability Appraisal concluding that all potential sites at Westbury should be scored as having a moderate adverse impact. This a blunt form of assessment but acknowledges its consistency. Also notes that the land proposed for development is some distance from the potential noise sources (railway line and golf driving range), and therefore, this negative element of the assessment should be discounted.</p>	Barratt Bristol.
<p><b>Funding for mitigation:</b> Specify the source of funding contributions. The source of funding contributions for measures that improve air quality is unclear.</p>	Individuals x10.
<p><b>Location of receptors:</b> Implement a comprehensive plan for placing receptors in the necessary areas. The AQMA is on the A350, but the development is not. This necessitates receptors all over Westbury and particularly under the escarpment.</p>	Individuals x10.
<b>Transport</b>	
<p><b>Highways and transport impact:</b> The Sustainability Appraisal overstates the impact of development on highways and transport. Westbury is a sustainable settlement with a good range of services and facilities, and it is well served with public transport. Scoring a development of the proposed scale as having a moderate adverse impact appears unduly negative, and a minor negative score is more appropriate.</p>	Barratt Bristol.
<p><b>Access arrangements between landowners:</b> The policy requires a primary point of vehicular access off Bratton Road, which is agreed upon as the most suitable location. To deliver this, it's necessary to ensure comprehensive access arrangements with linkages through the site. Additional wording is proposed at the end of the first bullet point of the policy to ensure an unfettered connection between landownerships. This is crucial for the delivery of the infrastructure on site, including the new children's nursery and the public open space. Without policy confirmation of unfettered access, there's potential for viability to challenge the delivery of this important supporting infrastructure.</p>	Barratt Bristol.
<p><b>Secondary vehicular access point unnecessary:</b> Based on the site's capacity and discussions with Wiltshire Highways, a secondary vehicular access to the site is unlikely to be required. No further access has been provided on the proposed replacement Concept Plan. This allows for further, detailed assessment work to be undertaken through the transport assessment process, informing future planning applications.</p>	Barratt Bristol.
<p><b>Support need for two vehicular access points:</b> The plans make provision for two points of principal vehicular access to service the proposed allocation from Bratton Road and Bitham Park, respectively. It is recommended that this is reflected in the policy wording.</p>	Manor and Auckland Farms.
<p><b>Provide more detail about access:</b> Provide detailed information about the access to the area. The details about how the area will be accessed are not provided.</p>	Individuals x10.

Key issues raised (Policy 62 - Land at Bratton Road, Westbury)	Respondent(s)
<b>Drainage</b>	
<b>Responsibility for drainage:</b> The Highways Authority should take responsibility for ensuring that public highways are properly drained. The Highways Authority, Wiltshire Council, has disclaimed responsibility for public highway drainage installed as part of a new housing development.	Individuals x10.
<b>Improve capacity:</b> The Highways Authority should address the drainage issue by improving the capacity of the drainage system. Bratton Road, the B3098 within Westbury, is poorly drained, causing standing water and occasional splashing into adjacent gardens.	Individuals x10.
<b>Impact of climate change:</b> The Highways Authority should consider the impact of climate change on drainage systems and make necessary adjustments. The drainage of some local roads is not coping with the original rainfall due to climate change.	Individuals x10.
<b>Renewable energy on-site provision</b>	
<b>Lack of landowner agreement:</b> The concept plan includes an area for future renewable energy/district heating/battery storage etc. within the land controlled by the White Horse Country Club. This is considered undeliverable as there is no agreement from the landowner for these uses, making Policy 62 undeliverable and the plan ineffective.	White Horse Country Club.
<b>Energy source:</b> Specify the energy source for the battery storage. The energy source for the battery storage is not specified.	Individuals x10.
<b>District heating system:</b> Provide detailed information about the district heating system. It's unclear which development the district heating will heat, its size, capacity, power source, and whether it's for commercial or domestic consumption.	Individuals x10.
<b>Incompatible with SANG:</b> The future land for battery storage and/ or renewable energy installations shown at Fig 4.46 appears to be within the area mapped as a Suitable Alternative Natural Greenspace in Policy 63. These uses would be incompatible, and the land would not be accessible, so it is advised that either this is relocated outside of the proposed SANG, or the SANG is extended.	Natural England.
<b>Neighbourhood planning</b>	
<b>Include neighbourhood plan allocation:</b> The Land at Bratton Road site should be expanded to include the adjacent 'Site 4', which was proposed for allocation in the Westbury Neighbourhood Plan but later removed at examination.	Westbury Town Council.

Key issues raised (Policy 62 - Land at Bratton Road, Westbury)	Respondent(s)
<b>Consistency between the Local Plan and the Neighbourhood Plan:</b> The Plan should be amended to reflect the latest position regarding allocations in the Westbury Neighbourhood Plan.	Westbury Town Council.
<b>Mapping</b>	
<b>Boundary markings:</b> Ensure consistency in the boundary markings across different development mappings. There is no consistency in the boundary markings of the Mane Way development and the Bratton Road development mapping.	Individuals x10.
<b>Red hatched area:</b> Provide detailed information about the plans for the red hatched area. The red hatched area on the Bratton Road map is vague and it's unclear what exactly is planned.	Individuals x10.
<b>Policy wording changes</b>	
<b>Suggest revised wording to paragraph 2 of policy text:</b> <i>[Alternative policy wording suggested by representor]</i>	Barratt Bristol.
<b>Suggest revised wording to bullet point 1 of policy text:</b> <i>[Alternative policy wording suggested by representor]</i>	Manor and Auckland Farm; Barratt Bristol.
<b>Suggest revised wording to bullet point 2 of policy text:</b> <i>[Alternative policy wording suggested by representor]</i>	Barratt Bristol.
<b>Deletion bullet points 7 and 8 of policy text.</b>	Barratt Bristol.
<b>Delete bullet point 9 of policy text.</b>	Barratt Bristol.
<b>Suggest revised wording to bullet point 11 of policy text:</b> <i>[Alternative policy wording suggested by representor]</i>	Barratt Bristol.

Table 5.77 [Policy 63 - Westbury Country Park] key issues

Key issues raised (Policy 63 - Westbury Country Park)	Respondent(s)
<b>Support for policy</b>	
<b>Essential part of mitigation strategy for protected sites:</b> The location of the proposed Westbury Country Park is supported. The supporting text on the proposed design of the Country Park is approved. The Country Park is considered capable of providing the functionality required to act as Suitable Alternative Natural Greenspace. The Country Park is seen as part of the mitigation strategy for protected sites in the district.	Natural England.
<b>Access to natural environment:</b> The Local Plan should ensure easy access to a natural environment that is rich in wildlife. The Environmental Improvement Plan emphasises that everyone should live within a 15-minute walk of nature.	Wiltshire Wildlife Trust.
<b>Delivery of policy</b>	
<b>SANG in addition to, not replace, off-site mitigation:</b> Include in all policies relating to SANG that the delivery of SANG will not be considered as off-site mitigation and all mitigation undertaken is in addition to the creation of these sites. Wiltshire Wildlife Trust recognises the effort to create SANG but wants to see commitments that all SANG are created in addition to any mitigation.	Wiltshire Wildlife Trust.
<b>Timing of provision:</b> Include in all policies relating to SANG that the delivery of SANG should be completed before the first occupation. Wiltshire Wildlife Trust suggests that the delivery of SANG should be completed before the first occupation.	Wiltshire Wildlife Trust.
<b>Management plan:</b> Suitable Alternative Natural Greenspace (SANG) should have a management plan and funding focused on biodiversity, not just amenity purposes. All potential SANG should prioritise biodiversity in their management plans and funding.	Wiltshire Wildlife Trust.
<b>Public access:</b> Clarify the policy to ensure it accurately reflects the intended duration of public access. Provide clear information about the future use of the country park and reassure the public about continued access. The policy is unclear on how an area can be open to the public in perpetuity but only until the first dwelling in either development is occupied. There is concern about why the public will not be able to use the country park after the first dwelling has been occupied, raising questions about potential construction on the country park.	Individuals x10.
<b>Funding:</b> Consider using CIL receipts for the provision of SANG if necessary. If the Council wishes to deliver a SANG for the existing population, it can do so using Community Infrastructure Levy (CIL) receipts.	Barratt Bristol.
<b>Opposition to policy</b>	

Key issues raised (Policy 63 - Westbury Country Park)	Respondent(s)
<p><b>Lack of landowner agreement:</b> The landowner's land, White Horse Country Club, falls within the area proposed as SANG, adjacent to the draft allocation at Bratton Way. The concept plan for Land at Bratton Road includes additional land to the east of the land allocated in the proposals map. Objection to Policies 62 and 63 in their current form as it includes their land for a proposed SANG, without their agreement. Reach an agreement with the relevant parties to ensure the deliverability of the Country Park and to ensure the deliverability of the allocations and sufficient mitigation for the proposed development. The SANG is 27ha, 23% of which is owned by the White Horse Country Club. The lack of agreement makes all three allocations (61, 62, and 63) undeliverable, leading to insufficient mitigation for the proposed development north of Westbury. However, no agreement is in place regarding this proposal/provision, making the Country Park undeliverable.</p>	<p>Castlewood Venture Partnerships; White Horse Country Club Ltd.</p>
<p><b>Size disproportionate to scale of development:</b> Re-evaluate the size requirement of the Country Park to align with the scale of development. The requirement of a new Country Park (approximately 27 ha in size) under Policy 63 is considered disproportionate to the scale of development and the mitigation needed.</p>	<p>Barratt Bristol.</p>
<p><b>Size disproportionate to SANG need:</b> Adjust the size of the proposed Country Park to match the calculated SANG requirement. The total need for Suitable Alternative Natural Greenspace (SANG) for the Bratton Road site, calculated using the Trowbridge Bat Mitigation Strategy (TBMS), is significantly less than the size of the proposed Country Park.</p>	<p>Barratt Bristol.</p>
<p><b>Provide onsite mitigation:</b> Revise the reference to SANG within Policy 62 (Land at Bratton Road) and propose the deletion of Policy 63. An alternative Concept Plan for the Land at Bratton Road site shows a significant area of public open space that could adequately mitigate the recreational pressures arising from the future resident population.</p>	<p>Barratt Bristol.</p>
<p><b>Alternative development option</b></p>	
<p><b>Housing need in Westbury:</b> The plan is not positively prepared to provide residential allocations to meet the Council's identified housing need. The Local Plan should allocate further sites to ensure delivery of the housing need as set out in the Plan.</p>	<p>Castlewood Venture Partnerships.</p>
<p><b>Support SANG in principle:</b> The landowner supports the provision of SANG in Westbury in-principle, to be provided for and thereby enable new developments in the town, and the use of part of their site for this use.</p>	<p>Castlewood Venture Partnerships.</p>
<p><b>Mixed-use development:</b> Consider dividing the land for both development and SANG to achieve a deliverable solution. Consider a mixed-use development for the site to maximize its potential. A deliverable solution could be achieved if part of the land is delivered for development and part for SANG. The SANG land, identified as</p>	<p>White Horse Country Club Ltd.</p>



Key issues raised (Policy 63 - Westbury Country Park)	Respondent(s)
<p>parcel ref 5 in the SA Report, was assessed for the provision of 965 – 1,353 homes with no major adverse effects identified. There is little difference in the scoring between Site 5 and the preferred site, suggesting that a mixed-use (residential + SANG) development could be appropriately accommodated on the site.</p>	
<p><b>Opportunity for a comprehensive solution to meet both housing and mitigation needs:</b> A comprehensive development solution is required for the client's landholding, and they consider there is a more suitable option available. The landowner's comprehensive development solution includes up to 440 new homes, a small local centre, three points of vehicular access, 6ha of green infrastructure, and a 32.2ha publicly accessible Country Park. They believe this development presents a sustainable opportunity for the Council to meet their housing needs.</p>	<p>Castlewood Venture Partnerships.</p>

## Local Plan section 4: Strategy for the rural areas

**5.28** Please see below the key issues table listing the key issues raised for the parts of the plan within section 4 that relate to planning for development in all rural areas. Due to the overlap of comments between areas, this key issues table has been amalgamated into one table.

- Planning for rural areas

Table 5.78 [Rural Areas/Rural Housing Requirements] key issues

Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<b>Rural areas: policy</b>	
<b>Local Service Centres:</b> Local Service Centres should be subject to their own settlement specific policies.	Individuals x10.
<b>Settlement boundaries:</b> Settlement boundaries should be amended to reflect allocations (including in Neighbourhood Plans) and commitments / allow settlements to grow.	Acorn Property Group, Individuals x10.
<b>Rural areas: landscape</b>	
<b>Preservation of village character:</b> Concern that future significant undefined urban extensions may threaten the loss of separate character and distinct identity of villages as separate communities.	CPRE.
<b>Development adjoining Swindon:</b> The Local Plan should allow for provision of small-scale development adjoining the Swindon Urban Area (SUA) where there are no designated Local Gaps around existing villages.	Hills Homes.
<b>Rural areas: transport</b>	
<b>Development impacts on infrastructure/transport networks:</b> Concern raised that there is inadequately consideration of knock-on impacts from large developments on infrastructure and transport networks elsewhere across the county.	Worton Parish Council.
<b>Pewsey Railways Station:</b> Concern that Pewsey Railway Station is not mentioned within the Local Plan.	Wilcot and Huish with Oare Parish Council.
<b>Rural areas: employment</b>	
<b>Cotswold Business Park:</b> Cotswold Business Park should be identified as a Principal Employment Area given the importance of its function to Wiltshire's economy.	Kemble Business Park Estates.
<b>High Post employment area:</b> The Principal Employment Area at High Post should be extended to include land permitted for B1 and B2 uses under planning application ref: 19/09327/FUL, and the Wiltshire Council Salt Depot.	Naish Felts Ltd.
<b>Broomcroft Road:</b> The Broomcroft Road site at Pewsey has been redeveloped for housing and should be removed from the list of PEAs in the Swindon Rural Area at para 4.270.	Individuals x10.
<b>Rural areas: community led housing</b>	
<b>Support for community led housing schemes:</b> Community led housing schemes should be supported and expedited through the system - long delays have been experienced with the scheme planned at Broad Chalke.	Broad Chalke Parish Council.

Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<b>Rural housing requirements: general</b>	
<b>Support:</b> Support/generally support the approach; No objection to the approach.	Acorn Property Group; Philip Gumm; New Forest National Park Authority.
<b>Lack of consultation:</b> Concern that the Rural Paper and its findings have not been adequately publicised to give rural communities enough say on its outputs within the Local Plan.	CPRE; Pitton and Farley Parish Council; Durrington Town Council; Individuals x10.
<b>Monitoring base date:</b> Objection to the base date for calculating completions/commitments being set at 2020, as this ignores delivery of housing prior to this; Concern that setting requirements backdated to 2020 requires these requirements to be addressed retrospectively.	Calne Without Parish Council; Individual x6; Broad Chalke Parish Council.
<b>Sustainable development strategy for villages:</b> The council should follow the approach to planning a sustainable development strategy for villages set out by Country Land and Business Association in the 'Sustainable Villages – Making Rural Communities Fit for the Future' report.	Barratt David Wilson Homes.
<b>Rural housing requirements: housing numbers</b>	
<b>Windfall allowance:</b> Concern that no windfall allowance has been applied to the rural requirements; it is unknown where windfalls will take place which could lead to pressure to develop in villages to meet notional targets even if there are high levels of windfall development elsewhere.	CPRE.
<b>Settlements in National Landscapes:</b> Table 4.8 and 4.9 should identify which settlements are within the National Landscape, and it should be acknowledged that it may not be possible for these settlements to meet the housing requirements. The scale and extent of development within the National Landscape needs to be reconsidered.	Cranborne Chase Area of Outstanding Natural Beauty.
<b>Existing housing stock as a baseline:</b> Consider that taking the existing number of homes at the settlement to work out a % of the HMA requirement to be a flawed approach.	Durrington Town Council.
<b>Anticipated pace of development:</b> It is noted that 47 of the 75 Large Villages and Local Service Centres will be required to deliver houses at a faster rate than historically, suggesting there is too much reliance on delivery at these settlements.	Individuals x10.
<b>Military owned properties:</b> The military have significant numbers of empty properties, some of which could be released to meet rural housing needs.	Netheravon Parish Council.

Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<p><b>Housing requirements for the rural areas:</b> The overall Wiltshire housing requirement should be higher, leading to subsequent higher rural housing numbers.</p>	<p>Hollins Strategic Land; Persimmon Homes; Hills Homes; St Philips Land Ltd; Bellway Homes; Wainhomes; Wain Estates; Castlewood Commercial Properties; Bloor Homes South West; Cala Homes.</p>
<p><b>Housing requirements as 'a minimum':</b> Rural housing requirements should be set as a minimum.</p>	<p>European Property Ventures; Persimmon Homes; Dilton Marsh LVA LLP; Welbeck Strategic Land.</p>
<p><b>Settlement hierarchy approach:</b> Concern that directing most of the HMA's requirements to main settlements is unjustified given the rural nature of the county / when many rural settlements are sustainable and unconstrained locations for growth.</p>	<p>J Huggett, R Huggett, Q Huggett, S Huggett and the Heirs of Stuart Huggett; Urchfont LVA LLP; Dilton Marsh LVA LLP; The Reversioners Trust.</p>
<p><b>Settlement hierarchy review needed:</b> The Wiltshire Core Strategy settlement hierarchy, as rolled forward to the Local Plan, fails to acknowledge how the sustainability of settlements may have changed in the intervening years, rendering the settlement hierarchy in need of review..</p>	<p>Gladman.</p>
<p><b>Pro-rata distribution of housing requirements:</b> Consider that the pro-rata approach to distributing rural housing requirements is too simplistic and doesn't take account of the difference in suitability of growth in different settlements.</p>	<p>Wain Estates.</p>
<p><b>Variation in sustainability of different rural settlements;</b> The methodology does not recognise that some rural settlements are more sustainable than others due to proximity to higher order settlements/access to a wider range of services and facilities; such settlements should be subject to higher requirements.</p>	<p>Waddeton Park; Barratt David Wilson Homes; Hills Homes; Urchfont LVA LLP; J Huggett, R Huggett, Q Huggett, S Huggett and the Heirs of Stuart Huggett Hollins Strategic Land; Welbeck Strategic Land.</p>
<p><b>Small/medium enterprise housebuilders:</b> Greater reliance should be placed on rural areas where development is more likely to be taken up by SME housebuilders, diversifying supply and reducing delays associated with larger more complex strategic sites.</p>	<p>The Reversioners Trust; Kington Farms Ltd; Ashford Homes (South West).</p>
<p><b>Existing completions/commitments:</b> The methodology places overreliance on existing completions and commitments; Concern that the majority (59%) of Swindon HMA's growth comprises completions or commitments already secured – concern this will lead to significant trailing-off in delivery after 5+ years.</p>	<p>J Huggett, R Huggett, Q Huggett, S Huggett and the Heirs of Stuart Huggett; Kington Farms Ltd.</p>

Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<b>Housing requirement adjustment in the HMA:</b> Redistribution of 'surplus' requirement is flawed as this artificially curtails growth irrespective of capacity to sustainability accommodate development; Object to the approach of distributing surplus equally across the settlements - this should be applied pro rata according to size of settlement, in the same way as redistribution of deficit is applied.	Persimmon Homes; Bloor Homes South West; Kington Farms Ltd.
<b>Housing requirements too low:</b> Concern that at settlements where there is no residual requirement to plan, these locations will be sterilised from any further development.	Persimmon Homes.
<b>Conflict with Policies 1 and 2:</b> There is conflict between Policies 1 and 2 which restrict the ability of LVs and LSCs to provide for housing delivery beyond immediate community needs, and para 4.264 which states that housing development focused on Local Services Centres and Large Villages carries with it a "wider strategic purpose".	Kington Farms Ltd.
<b>Working from home:</b> The acceleration of flexible home-working and internet shopping supports further development in the rural area.	The Reversioners Trust; Ashford Homes (South West).
<b>Housing for the elderly:</b> Concern that the methodology does not consider the needs for other types of housing such as extra care homes required for the elderly. There is a lack of rural strategy for this type of provision.	The Orders of St John Care Trust.
<b>Rural housing requirements: neighbourhood planning</b>	
<b>Role of neighbourhood planning:</b> The Local Plan should not dictate housing numbers of neighbourhood plans, this should be determined by neighbourhood plan steering groups.	Market Lavington Parish Council; Melksham Without Parish Council; Potterne Parish Council; Seend Parish Council.
<b>Neighbourhood plan evidence base:</b> Concern that detailed analysis within existing neighbourhood plans has not featured within the rural settlement assessments.	CPRE.
<b>Neighbourhood plan allocations as components of supply:</b> Neighbourhood plans should not be relied on to deliver housing requirements (including affordable); the Local Plan should allocate additional sites in the rural settlements; Neighbourhood plan allocations that do not have planning permission should not be relied on as commitments - many of Wiltshire's NPs are due to expire in 2026, and include allocations that have no planning permissions as yet.	Waddeton Park; J Huggett, R Huggett, Q Huggett, S Huggett and the Heirs of Stuart Huggett; Persimmon Homes; Urchfont LVA LLP; Cotswold Ecohomes Ltd; St Philips Land Ltd; Mssrs Gorringe, Bennett and Marks; Gleeson Land; Kitewood Estates Ltd; Rivar; Steven Graver Ltd; Dilton Marsh LVA LLP; Acorn Property Group.

Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<b>Disconnect between Local Plan and neighbourhood plan plan periods:</b> Unless there are fundamental constraints to allocations within NPs that are due to expire ahead of the Local Plan, they should be carried forward as allocations in the Local Plan to meet strategic priorities in delivering new homes.	Acorn Property Group.
<b>Trigger for the need for a Site Allocations Plan:</b> There is uncertainty over when a Wiltshire Council-led Housing Site Allocations Plan would be triggered in areas where NP requirements are not being planned for / concern about time taken to prepared NPs with delivery of sites being delayed until later in the plan period.	Persimmon Homes; Neston Park Estate; Mssrs Gorrings; Bennett and Marks; Bloor Homes South West; Cala Homes.
<b>Affordable housing in the rural areas:</b> Reliance on neighbourhood plans to deliver housing is unlikely to provide the affordable housing needed in rural areas; likely to exacerbate affordability gap in some rural settlements; the methodology should be informed by local housing needs assessments.	Urchfont LVA LLP; Hills Homes; Hollins Strategic Land; Wain Estates; Dilton Marsh LVA LLP.
<b>Development in the countryside:</b> The requirement for housing development outside the settlement boundaries to be supported by either a Neighbourhood Plan or site allocation is unduly restrictive and does not meet the test of soundness.	Neston Park Estate.
<b>Rural housing requirements: transport</b>	
<b>Public transport in rural areas:</b> Most Local Service Centres and Large Villages have fewer than 1200 residents, minimal local facilities/employment, and minimal alternatives to the car – development will require public transport provision over distances involved.	Go South Coast Ltd.
<b>Capacity of local highways infrastructure:</b> The methodology does not take adequate account of the capacity or nature of local highway infrastructure.	Bratton Parish Council.
<b>Economic Development and Transport Plans:</b> The outcomes from the Rural Paper are not supported by definitive Economic Development and Transport Plans.	CPRE.
<b>Active travel connectivity:</b> There should be more emphasis on improving connectivity in rural areas, with support for cycle routes linking villages to centres.	Bratton Parish Council.
<b>Decarbonisation of the transport network:</b> With decarbonisation of private transport (electric vehicles) likely to take place over the plan period, this supports further development in the rural area.	The Reversioners Trust.
<b>Rural housing requirements: environment.</b>	
<b>Environmental constraints:</b> The methodology for deriving housing requirements should be revised to avoid unnecessary constraints on development due to general environmental constraints.	Bloor Homes South West.

Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<b>Environmental constraints/capacity led approach:</b> Concern with the approach to distribution being led by a pre-determined overall quantum, rather than being led by environmental constraints which would determine what capacity exists.	Persimmon Homes.
<b>Rural housing requirements: utilities</b>	
<b>Availability of utilities:</b> Insufficient consideration of electricity and water supply implications.	CPRE.
<b>Rural housing requirements: healthcare and services</b>	
<b>Housing requirements in areas with restricted healthcare/service capacity:</b> Concern that settlements with a lack of NHS provision, without facilities, have nonetheless been allocated a requirement; The availability (or lack of) of services, facilities and employment at each settlement should have more of an influence on the housing requirements.	CPRE; Individuals x10.
<b>Consideration of healthcare capacity as a constraint:</b> The NHS provision strategy is not dictated by the Council or development industry and should not be a factor influencing the rural housing numbers.	White Horse County Club Ltd.; Martin Grant Homes; Hannick Homes; Gleeson Land.
<b>Proximity to other settlements:</b> The methodology does not recognise that some rural settlements are more sustainable than others due to proximity to higher order settlements/access to a wider range of services and facilities; such settlements should be subject to higher requirements.	Welbeck Strategic Land; Rosconn Strategic Land
<b>Viability of services:</b> Not enough homes are directed to the rural area - this is likely to lead to a downturn in the vitality and viability of rural areas; More detailed assessment should consider current and ongoing vitality/viability of rural facilities and services / the methodology currently fails to consider this.	Metis Homes; Bloor Homes South West; Wain Estates; Hollins Strategic Land; Hills Homes.
<b>Rural housing requirements: availability of land</b>	
<b>Strategic Housing and Economic Land Availability Assessment:</b> The SHELAA should be updated to take full account of availability of land at the rural settlements; The methodology should take into account whether or not there are suitable, available and deliverable sites.	Hills Homes; Bloor Homes South West.
<b>Chippenham HMA rural housing requirements: Market Lavington (Local Service Centre)</b>	
<b>Settlement constraints:</b> Market Lavington is a constrained settlement (conservation area, traffic congestion, proximity to nearby settlements) which makes identification of sites problematic. The number proposed is therefore too high.	Market Lavington Parish Council.



Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<b>Settlement opportunities:</b> Market Lavington is the only Local Service Centre in the Chippenham HMA, has a good level of facilities and is relatively unconstrained. The settlement should accommodate a greater quantum of development.	Bewley Homes.
<b>Omission site promoted:</b> Land to the south of Clay Lane.	Bewley Homes.
<b>Chippenham HMA rural housing requirements: Atworth (Large Village)</b>	
<b>Lack of a neighbourhood plan:</b> There is no adopted or emerging Neighbourhood Plan at Atworth, leading to uncertainty over delivery of neighbourhood plan led housing at Atworth during the plan period.	Neston Park Estate.
<b>Omission site promoted:</b> Land to the east of Atworth Business Park.	Neston Park Estate.
<b>Chippenham HMA rural housing requirements: Christian Malford (Large Village)</b>	
<b>School viability:</b> The number allocated to Christian Malford is too low as Christian Malford CofE Primary School has a capacity of 120 pupils but only 67 pupils as of September 2023.	Hollins Strategic Land; Hills Homes.
<b>Affordable housing:</b> None of the committed homes at Christian Malford are affordable because the NP has allocated small sites - leading to increasing affordability gap over the Plan period.	Hills Homes.
<b>Omission site promoted:</b> Land at Station Road.	Hollins Strategic Land.
<b>Omission site promoted:</b> Land at Station Road.	Hills Homes.
<b>Chippenham HMA rural housing requirements: Derry Hill/Studley (Large Village)</b>	
<b>Combination of settlements:</b> Object to the combination of Derry Hill and Studley as a single Large Village, as they have different characters and are split by the A4.	Calne Without Parish Council; Individuals x10.
<b>Overreliance on Studley:</b> With Derry Hill being heavily constrained, there appears to be expectation that growth will be delivered at the much smaller Studley, which has poor availability of facilities.	Individual x10.
<b>Past rates of delivery:</b> The number allocated to Derry Hill/Studley is too high because Derry Hill and Studley have already grown significantly in recent years (pre 2020), e.g. at Studley Gardens.	Calne Without Parish Council; Individuals x20.
<b>Increase in housing requirement:</b> The increase in housing requirement from the previous consultation in 2021 is not justified, when the requirements for Wiltshire overall and the Chippenham area have reduced.	Calne Without Parish Council; Individuals x10.

Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<b>Highways constraints:</b> Insufficient recognition has been given to constraints posed by traffic on the A4/Studley Crossroads; and additional traffic from the nearby strategic allocations at Chippenham and Calne.	Calne Without Parish Council; Calne Community Neighbourhood Plan Steering Group; Individuals x20.
<b>Lack of available land:</b> The parish council's call for sites identified insufficient development opportunities that could deliver housing requirement.	Calne Without Parish Council; Calne Community Neighbourhood Plan Steering Group; Individuals x10.
<b>Settlement constraints:</b> Derry Hill is constrained by adjoining Ancient Woodland and the historic Bowood Estate.	Individuals x10.
<b>Availability of services:</b> Concern that no new facilities or infrastructure are proposed.	Individuals x10.
<b>Primary school capacity:</b> The primary school is close to capacity which should be factored into the requirement to be planned for.	Calne Community Neighbourhood Plan Steering Group; Individuals x10.
<b>Utilities:</b> Concern that services such as water and sewerage and electricity capacity have not been considered in the figures for development.	Calne Community Neighbourhood Plan Steering Group; Individuals x10.
<b>Omission site promoted:</b> Land at Old Road, Derry Hill.	The Reversioners Trust.
<b>Chippenham HMA rural housing requirements: Hullavington (Large Village)</b>	
<b>Existing completions/commitments:</b> The number allocated to Hullavington is too low because existing completions/commitments remove remaining requirement, thus removing opportunities for further sustainable growth.	Cotswold Homes.
<b>Settlement opportunities:</b> The requirement does not reflect the role and function of Hullavington as a major employment location. Hullavington can support a higher number due to its proximity to strategic employment area.	Barratt David Wilson Homes.
<b>Settlement viability:</b> A decreasing and ageing population does not support viability/vitality of the community, its facilities and employment market. Further growth is needed.	Barratt David Wilson Homes
<b>Strategic growth in the countryside:</b> Consideration should be given to larger-scale housing and economic growth in strategically important rural areas outside of the defined settlement areas - such as Hullavington/ Stanton St Quinton/ Buckley Barracks/ Dyson.	Barratt David Wilson Homes.
<b>Omission site promoted:</b> Land north east of Hullavington.	Cotswold Homes.

Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<b>Omission site promoted:</b> Land north of Hullavington.	Barratt David Wilson Homes.
<b>Chippenham HMA rural housing requirements: Oaksey (Large Village)</b>	
<b>Omission site promoted:</b> Oaksey Park.	Cotswold Ecohomes Ltd.
<b>Chippenham HMA rural housing requirements: Potterne (Large Village)</b>	
<b>Past rates of delivery:</b> Potterne has already grown significantly with four new housing estates in the 1960s and further social housing since then.	Potterne Parish Council.
<b>Lack of available land:</b> The neighbourhood plan has already identified the only suitable site. No further opportunities exist.	Potterne Parish Council; CPRE Kennet Group.
<b>Lack of availability of services:</b> The number allocated to Potterne is too high because the village has no school or employment, and residents will have to travel.	Potterne Parish Council.
<b>Omission site promoted:</b> Land at Butts Farm.	Philip Gumm.
<b>Chippenham HMA rural housing requirements: Rowde (Large Village)</b>	
<b>Housing requirement too high:</b> The number allocated to Rowde is a disproportionate increase compared to the size of the village.	Individuals x10.
<b>Settlement identity:</b> The scale of requirement risks coalescence with Devizes.	Individuals x10.
<b>Lack of available land:</b> There are very few opportunities for growth that exist within the settlement boundary.	Individuals x10.
<b>Lack of availability of services:</b> Concern that Rowde has no shops/few facilities and no employment, and residents will have to travel.	Individuals x10.
<b>Healthcare constraints:</b> Rowde has no NHS facilities, and residents will have to travel to reach these facilities; There are NHS capacity issues, which should limit the growth that can come forward at Rowde.	Individuals x10.
<b>Parking:</b> Concern that further development would exacerbate traffic/parking issues.	Individuals x10.
<b>Flood risk:</b> Concern that further development could exacerbate risk of flooding to properties.	Individuals x10.
<b>Housing requirement miscalculated:</b> The number allocated to Rowde is incorrectly calculated and should be 46.	Individuals x10.
<b>Commitments:</b> An application on Sands Lane / Tower Hill should reduce the number by 1.	Individuals x10.

Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<b>Local opposition to development:</b> The assessment for Rowde doesn't take into account local circumstance, such as the current application (PL/2023/00386), being pursued by a developer, which is locally opposed to due to a lack of infrastructure.	CPRE Kennet Group.
<b>Chippenham HMA rural housing requirements: Rudloe (Large Village)</b>	
<b>Methodology:</b> Concern that the methodology does not correct for villages which have excess supply - such as Rudloe which has a calculated need of 111 homes but 255 committed.	CPRE.
<b>Amenities available at Corsham:</b> The proximity of Rudloe to Corsham, which benefits from a wider range of services, facilities and employment (including the nearby Fiveways Trading Estate), should be taken into account when considering Rudloe's sustainability to accommodate further growth.	Presscredit (Rudloe) Ltd.
<b>Omission site promoted:</b> RAF Rudloe Manor (brownfield opportunity)	Presscredit (Rudloe) Ltd.
<b>Chippenham HMA rural housing requirements: Seend (Large Village)</b>	
<b>Neighbourhood plan evidence base:</b> Seend's housing requirement should have been informed by the outcomes of the neighbourhood plan site assessment report. It is not underpinned by the same detail that underpinned the neighbourhood plan, on assessments of constraints, housing needs, CLT housing requirements data.	Seend Parish Council.
<b>Housing requirement for Seend village:</b> Object to the setting of a requirement for Seend large village only, when the neighbourhood plan allocates for the whole parish area.	Seend Parish Council.
<b>Lack of employment opportunities:</b> The number allocated to Seend is too high because Seend has no employment, and residents will have to travel.	Seend Parish Council.
<b>Highways constraints:</b> The village's roads are too narrow/congested to support the growth.	Seend Parish Council.
<b>Chippenham HMA rural housing requirements: Shaw/Whitley (Large Village)</b>	
<b>Combination of settlements:</b> It is inappropriate to group Shaw and Whitley as a single Large Village - they are two distinct settlements / should be classed as two separate Small Villages.	Community Action Whitley and Shaw (CAWS); Individuals x10.
<b>Past rates of delivery:</b> The number allocated to Shaw/Whitley is too high because the increase in the rate of delivery from past rates is unjustified.	Individuals x10.
<b>Lack of employment opportunities:</b> Shaw/Whitley have no employment opportunities, and residents will have to travel by private car.	Community Action Whitley and Shaw (CAWS); Individuals x10.
<b>Lack of services:</b> There are few services available, e.g. GP surgery or shops).	Community Action Whitley and Shaw (CAWS).

Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<b>Broadband:</b> Local broadband is poor meaning that home working is difficult in the the villages.	Community Action Whitley and Shaw (CAWS).
<b>Connectivity with Melksham:</b> Shaw/Whitley is poorly connected to Melksham town centre / poor bus connectivity.	Community Action Whitley and Shaw (CAWS); Melksham Without Parish Council.
<b>Education capacity:</b> The local primary school is full and forecast to remain. Additional primary children having to travel to school is contrary to NPPF para 106a and conflicts with Wiltshire’s School Places Strategy, regarding the importance of parental preference and ability to access schools close to home.	Melksham Without Parish Council; Community Action Whitley and Shaw (CAWS); Individuals x10.
<b>Sustainable transport:</b> The feasibility of sustainable transport options to the new proposed school at Pathfinder Way have not been adequately considered, e.g. bus routes, pedestrian and cycle connectivity.	Melksham Without Parish Council.
<b>Overreliance on Whitley:</b> There are no locations for Shaw to grow, which places unfair burden on Whitley.	Individuals x10.
<b>Flood risk:</b> Further development could exacerbate risk of flooding to properties.	Shaw and Whitley Community Emergency Group; Individuals x10.
<b>Highways constraints:</b> Further development will add to congestion in the village/Corsham Road.	Individuals x10.
<b>Proximity to higher order settlements:</b> The number allocated to Shaw/Whitley is too low because Shaw/Whitley is more sustainable location for growth than other Large Villages because of proximity to higher order settlements and access to a wider range of services and facilities.	Waddeton Park.
<b>Omission site promoted:</b> Land North of Folly Lane & South of First Lane.	Waddeton Park.
<b>Omission site promoted:</b> Land at Whitley Farm.	Neston Park Estate.
<b>Chippenham HMA rural housing requirements: Sherston (Large Village)</b>	
<b>Neighbourhood plan allocation as components of supply:</b> The site that is allocated by the neighbourhood plan (that runs until 2026) should be allocated through the Local Plan to provide certainty beyond 2026.	Acorn Property Group.
<b>Neighbourhood plan evidence base:</b> The neighbourhood plan allocation will provide land for a GP Surgery, which should be reflected in the Stage 3b assessment (Rural Housing Paper).	Acorn Property Group.
<b>Settlement boundary:</b> The Sherston settlement boundary should be extended to include land allocated through the neighbourhood plan.	Acorn Property Group.
<b>Omission site promoted:</b> Land at Sopworth Lane.	Acorn Property Group.
<b>Omission site promoted:</b> Land at Sherston Lane.	Hills Homes.

Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<b>Chippenham HMA rural housing requirements: Sutton Benger (Large Village)</b>	
<b>Settlement constraints:</b> Support the residual requirement of 0, but raise concerns in relation to any further housing: availability of local services, traffic, flood risk, waste water infrastructure, healthcare and education capacity, loss of Best and Most Versatile (BMV) Agricultural Land.	Sutton Benger Parish Council.
<b>Housing requirement too low:</b> Concern that opportunities for sustainable development would be curtailed by the village having met its target.	Persimmon Homes.
<b>Omission site promoted:</b> Land at Sutton Lane.	Persimmon Homes.
<b>Omission site promoted:</b> Land off High Street	Gladman.
<b>Chippenham HMA rural housing requirements: Urchfont (Large Village)</b>	
<b>Affordable housing need:</b> A recent Housing Needs Survey identified a need for 8 affordable homes, of which only 4 are anticipated to come forward through sites allocated by the neighbourhood plan. A further allocation is needed.	Urchfont LVA LLP.
<b>Omission site promoted:</b> Land off Ballingers.	Urchfont LVA LLP.
<b>Chippenham HMA rural housing requirements: West Lavington/Littleton Pannell (Large Village)</b>	
<b>Housing requirement too low:</b> Consider that it is contradictory to identify the village as suitable for growth, but to only identify a small level of further growth with no site-specific allocations.	J Huggett, R Huggett, Q Huggett, S Huggett and the Heirs of Stuart Huggett.
<b>Omission site promoted:</b> Land Lying to the south west of High Street, West Lavington.	J Huggett, R Huggett, Q Huggett, S Huggett and the Heirs of Stuart Huggett.
<b>Chippenham HMA rural housing requirements: Worton (Large Village)</b>	
<b>Impact of allocations elsewhere:</b> Concern that strategic allocations at Salisbury, Chippenham, Melksham and Trowbridge will increase traffic volume on the C20 Worton, which is already a junction of concern.	Worton Parish Council.
<b>Traffic:</b> The assessment for Worton doesn't take into account local circumstance, such as traffic impacts on the village.	CPRE Kennet Group.
<b>Chippenham HMA rural housing requirements: Yatton Keynell (Large Village)</b>	

Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<b>Housing requirement too low:</b> Concern that existing completions/commitments remove almost all remaining requirement, thus removing opportunities for further sustainable growth later in the plan period to support services.	Cotswold Homes.
<b>Omission site promoted:</b> Land at Biddlestone Lane.	Cotswold Homes.
<b>Chippenham HMA rural housing requirements: Lacock (Small Village)</b>	
<b>Omission site promoted:</b> Land to the south of Corsham Road.	Mrs and Mrs Self.
<b>Omission site promoted:</b> Land to the east of Notton.	Mrs and Mrs Self.
<b>Chippenham HMA rural housing requirements: Lower Stanton St Quintin (Small Village)</b>	
<b>Settlement opportunities:</b> Lower Stanton St Quintin is a sustainable location for development in terms of facilities, proximity to Malmesbury and Chippenham, nearby employment areas; transport links.	Gleeson Land.
<b>Omission site promoted:</b> Land south of Seagry Road.	Gleeson Land.
<b>Salisbury HMA rural housing requirements: Downton (Local Service Centre)</b>	
<b>Housing requirement:</b> The requirement is considered achievable given Downton's current progress towards hitting these targets. Further development must accord with the Neighbourhood Plan, be small sites and towards the end of the Plan period.	Downton Parish Council.
<b>Flooding:</b> High flood risk and strained water infrastructure capacity in Downton must be taken into account - concern that the requirement would need infrastructure upgrades to accommodate.	Downton Parish Council.
<b>Education capacity:</b> Object to curtailing the requirement at Downton on the basis of education constraints, which can fluctuate over time.	Persimmon Homes.
<b>Settlement opportunities/constraints:</b> Downton benefits from a good range of services, facilities and bus transport links - but is restricted as its lies within the nutrient neutrality zone.	Go South Coast Ltd.
<b>Omission site promoted:</b> Land at Salisbury Road.	Persimmon Homes.
<b>Omission site promoted:</b> Land north of Hamilton Park.	The Thorne Family.
<b>Salisbury HMA rural housing requirements: Mere (Local Service Centre)</b>	
<b>Support:</b> Support the number of homes to be planned for at Mere.	Justin Stone and Nicola Warden; Kate Curtis.

Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<b>Omission site promoted:</b> Land on the West Side of Shaftesbury Road.	Kate Curtis.
<b>Omission site promoted:</b> Land Lying to the East of Woodlands Rd.	Justin Stone and Nicola Warden.
<b>Salisbury HMA rural housing requirements: Tisbury (Local Service Centre)</b>	
<b>Highways network:</b> The number allocated to Tisbury is too high because all other Local Service Centres are served by A-roads. Tisbury is only served by C-roads/unclassified roads, which means further development is restricted by limited highways capacity.	Ansty Parish Council.
<b>Impacts on nearby settlements:</b> The scale of growth will have negative impacts on nearby villages of Ansty, Swallowcliffe, Fovant, Sutton Mandeville, Chicks Grove, Chilmark, Teffont & Hindon.	Ansty Parish Council.
<b>Lack of employment opportunities:</b> The number of homes is not matched employment opportunities, leading to more out-commuting for work.	Ansty Parish Council.
<b>Station Works neighbourhood plan allocation:</b> Concern about the deliverability of the Station Works neighbourhood plan allocation given flood risks identified - leading to an enlarged residual requirement that would have to be met elsewhere; The dismissal of an appeal on the allocated Station Works site raises questions over its deliverability, and another would need to be allocated.	Ansty Parish Council; Hallam Land Management.
<b>Sport Centre site neighbourhood plan allocation:</b> Uncertainties surround the delivery of the former Tisbury Sports Centre allocated site, which has yet to be signed off at S106.	Hallam Land Management.
<b>Affordable housing need:</b> The council's Housing Team have confirmed the waiting list for affordable housing in the Tisbury Area is 27, with 19 required in neighbouring parish areas. A larger scheme is required to meet these demands.	Hallam Land Management.
<b>Omission site promoted:</b> Land off Mayhew Row.	Hallam Land Management.
<b>Salisbury HMA rural housing requirements: Wilton (Local Service Centre)</b>	
<b>Omission site promoted:</b> Naish Felts, Crow Lane - site subject to Reserved Matters planning application.	Naish Felts Ltd.
<b>Salisbury HMA rural housing requirements: Alderbury (Large Village)</b>	
<b>Consultation with Highways England regarding the A36:</b> Concern that there is a lack of evidence of dialogue between Wiltshire Council and National Highways regarding the potential impacts of housing development in Alderbury on the over-loaded A36.	Alderbury Parish Council; Elected member x1.



Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<b>Accuracy of completions/commitments data:</b> Dispute that 70 completions/commitments is correct - this should be 57, leaving a higher residual requirement left to plan for.	Formula Land.
<b>Healthcare capacity:</b> There is no evidence of NHS shortfall or capacity problems that would justify delaying delivery towards the later end of the plan period. This conflicts with the decision in December 2018 which concluded there was no demand for a Local Health Centre on the Matrons Farm site.	Formula Land.
<b>Omission site promoted:</b> Land off Southampton Road.	Formula Land.
<b>Salisbury HMA rural housing requirements: Bulford (Large Village)</b>	
The settlement is heavily constrained by MOD operations and ownership, and largely exists to support military activity – limiting the scope to find sites.	Go South Coast Ltd.
<b>Salisbury HMA rural housing requirements: Broad Chalke (Large Village)</b>	
<b>Settlement constraints:</b> Insufficient reduction in the housing requirement has been applied to take account of environmental constraints: AONB, protected water meadows, the River Avon catchment, farmland; Insufficient reduction in the housing requirement has been applied to take account of infrastructure constraints: narrow roads generally without pathways, no classified roads/railway connections, no mains drainage, limited telecommunications coverage; primary school close to capacity; the GP surgery on reduced hours and only open twice per week and under threat of closure.	Broad Chalke Parish Council.
<b>Lack of employment opportunities:</b> There are few employment opportunities, leading to out-commuting to Salisbury.	Broad Chalke Parish Council.
<b>Lack of available land:</b> Few unconstrained and available development opportunities exist.	Broad Chalke Parish Council.
<b>Neighbourhood plan evidence base:</b> The conclusion ‘that additional housing development has the potential to support the services and facilities at the settlement’ conflicts with the findings of the Neighbourhood Plan.	Broad Chalke Parish Council.
<b>Salisbury HMA rural housing requirements: Collingbourne Ducis (Large Village)</b>	
<b>Omission site promoted:</b> Station Yard.	Acorn Construction.
<b>Salisbury HMA rural housing requirements: Durrington (Large Village)</b>	
<b>Housing requirement too high:</b> Durrington is a constrained settlement and the housing requirement should be reduced from 55 to 30.	Durrington Town Council.

Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<b>Historic building rates:</b> Historic building rates of a single large development gives an inaccurate picture of the average number of homes that have been delivered over the past 10 years (this is more like 2 per annum).	Durrington Town Council.
<b>Larkhill:</b> Concern that the MoD settlement of Larkhill, which shares facilities with Durrington, has been omitted from the Local Plan.	Durrington Town Council.
<b>Commitments:</b> Concern that SHELAA site S98 was granted planning permission in 2006, but no development has taken place - this should not be factored as a commitment.	Durrington Square Ltd.
<b>Settlement constraints:</b> The settlement is heavily constrained by MOD operations and ownership, and largely exists to support military activity – limiting the scope to find sites.	Go South Coast Ltd.
<b>Omission site promoted:</b> Former Millennium Park.	Durrington Square Ltd.
<b>Salisbury HMA rural housing requirements: Morgans Vale / Woodfalls (Large Village)</b>	
<b>Settlement constraints:</b> Concern that the reduction that has been applied to the requirement is not enough - it is inconsistent with the severity of constraints: proximity to the New Forest National Park, Priority Habitat sites, local SSSI, Avon Valley footpath, constrained traffic arrangements for Primrose and Slab Lanes.	Redlynch Parish Council; Individuals x10.
<b>Development in nearby settlements:</b> Redlynch and Lover are within the same parish and share the same facilities - development that has taken place in Redlynch and Lover should be taken into consideration.	Redlynch Parish Council; Individuals x10.
<b>Education capacity:</b> Education capacity is limited. The reduction if requirement at Downton should also apply at Morgans Vale and Woodfalls, due to the school being shared.	Redlynch Parish Council; Individuals x10.
<b>Lack of available land:</b> Slowing past rates of delivery demonstrate a lack of available land, and it is inappropriate to expect rates to rise again.	Redlynch Parish Council; Individuals x10.
<b>Rate of delivery:</b> A historic slowing in the rate of housing delivery at the settlement mirrors a reducing availability of land, so the proposed increased rate of delivery in unjustified.	Individuals x10.
<b>Salisbury HMA rural housing requirements: Netheravon (Large Village)</b>	
<b>Lack of available land:</b> The number allocated to Netheravon is too high because aside from the coal yard, there is a lack of available land due to the Army Training Area.	Netheravon Parish Council.
<b>Salisbury HMA rural housing requirements: Pitton (Large Village)</b>	
<b>Settlement hierarchy:</b> Pitton should not be classed as a Large Village.	Pitton and Farley Parish Council.

Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<b>Services:</b> The local shop is expected to close in 2026, albeit there is a plan for a community shop.	Pitton and Farley Parish Council.
<b>Flood risk:</b> The village is at high risk from flooding, and with climate change more housing would add to this.	Pitton and Farley Parish Council.
<b>Sustainable transport:</b> There are few sustainable transport options available in the village.	Pitton and Farley Parish Council.
<b>Digital connectivity:</b> The village has poor access to the internet.	Pitton and Farley Parish Council.
<b>Salisbury HMA rural housing requirements: Porton (Large Village)</b>	
<b>Education capacity:</b> Conclusions drawn on limited education capacity are inconsistent with the School Places Strategy which forecasts the number of pupils attending rural schools will fall over the next few years; and findings of an independent Education Impact and Mitigation Assessment which concludes a forecast surplus of available spaces primary school places, and further development would support ongoing financial viability of St Nicholas CoE Primary School.	Metis Homes.
<b>Proximity to Porton Down employment site:</b> Porton is uniquely placed in relation to Porton Down, a key employment site, and can take more growth.	Metis Homes.
<b>Settlement opportunities:</b> Porton is a sustainable location to support growth: Good transport links, regular bus service, a school, a pub, a shop, a post office, open space/green infrastructure and health care provision, absence of constraints that limit growth in other villages (e.g. AONB, National Park).	Metis Homes.
<b>Viability of services:</b> Without further growth continues vitality and viability of existing services would be put at risk.	Metis Homes.
<b>Omission site promoted:</b> Land east of Idmiston Road.	Metis Homes.
<b>Salisbury HMA rural housing requirements: Shrewton (Large Village)</b>	
<b>Housing numbers:</b> The requirement for Shrewton does not reflect the outcome of local survey conducted in support of a neighbourhood plan, that was subsequently aborted. This identified a need for ~22 homes over this period.	Individuals x10.
<b>Traffic impacts:</b> Consideration should be given to traffic congestion in Shrewton caused by commuting between nearby military sites, and rat-running of the A303.	Individual x10.
<b>Support:</b> Support the number of homes to be planned for at Shrewton.	Individual x10.
<b>Neighbourhood planning:</b> Concern that the lack of progress on producing a neighbourhood plan casts doubt on the delivery of allocations to meet the village requirement. The Local Plan should allocate a site.	Individual x10.

Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<b>Omission site promoted:</b> Land to the west of Tanners Lane.	St Philips Land Ltd.
<b>Omission site promoted:</b> Land to the south of London Road.	St Philips Land Ltd.
<b>Omission site promoted:</b> Land to the north of Amesbury Road.	St Philips Land Ltd.
<b>Salisbury HMA rural housing requirements: Winterslow / Middle Winterslow (Large Village)</b>	
<b>Omission site promoted:</b> Land at Middleton Road	Primetower.
<b>Salisbury HMA rural housing requirements: Whiteparish (Large Village)</b>	
<b>Traffic congestion:</b> The number allocated to Whiteparish is too high because there are significant issues with accessing Salisbury due to traffic congestion on the A36 Southampton Road.	Whiteparish Parish Council.
<b>Salisbury HMA rural housing requirements: Ford (Small Village)</b>	
<b>Allocation at Ford:</b> Conclusions reached about the allocation North East of Old Sarum, at para 4.1.30 are as applicable to land at Ford which supports the principle of allocation at this settlement; Ford has better links to Salisbury due to its physical proximity and Public Rights of Way connections.	Barratt David Wilson Homes.
<b>Omission site promoted:</b> Land at Ford.	Barratt David Wilson Homes.
<b>Swindon HMA rural housing requirements: Cricklade (Local Service Centre)</b>	
<b>Housing requirement:</b> Support the reduction in the requirement for Cricklade when compared with the numbers consulted on in the previous consultation.	Cricklade Town Council.
<b>North Meadow Special Area of Conservation:</b> Development at Cricklade should be carefully managed through the review of the neighbourhood plan to ensure that North Meadow SAC can be protected from further damaging speculative development.	Cricklade Court Leet Charity.
<b>Settlement hierarchy:</b> Due to the availability of services and facilities and transport links, Cricklade should be reclassified as a Market Town. There are no other Market Towns to the north of the M4 in the Swindon HMA.	Hannick Homes.
<b>Neighbourhood planning:</b> There is a lack of certainty that an updated neighbourhood plan will be prepared to plan for the housing needs that have been identified.	Bloor Homes South West.
<b>Settlement opportunities:</b> Cricklade has sufficient services, facilities and land capacity to support a greater number of homes; the reduction in the number is unjustified.	Mac Mic Group; Bellway Homes; Hannick Homes.

Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<b>Proximity to higher order settlements:</b> The low level of housing doesn't reflect the settlement's proximity to Cirencester, Swindon, Cheltenham and Gloucester and their employment opportunities and higher order facilities, which can be shared with residents of Cricklade using sustainable modes of transport.	Bellway Homes.
<b>Past rates of delivery:</b> Insufficient justification to reduce past delivery rates from 12 homes per annum to 4.0 dwellings per annum, which does not settlement sustainability, and could lead to stagnation.	Bloor Homes South West.
<b>Healthcare capacity:</b> Object to the assessment that concludes there are “NHS capacity constraints” - there is insufficient evidence to support this.	Bellway Homes.
<b>Omission site promoted:</b> Land north of Malmesbury Road, 350 homes.	Mac Mic Group.
<b>Omission site promoted:</b> Land at Godby's Farm.	Bellway Homes.
<b>Omission site promoted:</b> Land at Horsey Down.	Bloor Homes South West.
<b>Omission site promoted:</b> Land at The Forty.	Hannick Homes.
<b>Swindon HMA rural housing requirements: Pewsey (Local Service Centre)</b>	
<b>Settlement opportunities:</b> There is land capacity and a level of services, facilities, and sustainable travel options to support increasing the housing requirement at Pewsey.	Paul Bowerman Discretionary Trust; Gleeson Land.
<b>Employment:</b> Pewsey provides 3 out of 5 of the principal employment areas within the Swindon HMA and should take further housing growth as a result.	Gleeson Land.
<b>Completions elsewhere in the Housing Market Area:</b> The reduction in requirement for Pewsey, due to completions and commitments elsewhere in the HMA at Lyneham and Purton, is flawed. The settlements are unrelated and this is arbitrary.	Persimmon Homes.
<b>Omission site promoted:</b> Land at Swan Road.	Paul Bowerman Discretionary Trust.
<b>Omission site promoted:</b> Land at Old Hospital Road.	Gleeson Land.
<b>Omission site promoted:</b> Land at Astley Close.	Persimmon Homes.
<b>Swindon HMA rural housing requirements: Aldbourne (Large Village)</b>	
<b>Housing requirement too low:</b> There is a contradiction in identifying Aldbourne as a suitable location for growth, acknowledging the strategic importance of housing delivery in Large Villages, yet only identifying a nominal need for further growth within the village with no site-specific allocations.	Kington Farms Ltd.

Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<b>Omission site promoted:</b> Land west of Southward Lane.	Kington Farms Ltd.
<b>Swindon HMA rural housing requirements: Baydon (Large Village)</b>	
<b>Capacity for growth:</b> The reduction in the requirement for growth is unjustified. The settlement has capacity for growth.	Hannick Homes.
<b>Swindon HMA rural housing requirements: Broad Hinton (Large Village)</b>	
<b>Housing requirement too low:</b> The redistribution of surplus equally across the rural settlements leads to nullification of the residual requirement in Broad Hinton, which is unjustified. Redistribution should be applied on a pro rata basis.	Kington Farms Ltd.
<b>Swindon HMA rural housing requirements: Great Bedwyn (Large Village)</b>	
<b>Neighbourhood planning:</b> Concern that there is no anticipated timely delivery of a neighbourhood plan at Great Bedwyn.	Mssrs Gorringe, Bennett and Marks.
<b>Swindon HMA rural housing requirements: Lyneham (Large Village)</b>	
<b>Settlement hierarchy:</b> Lyneham should be reclassified as a Local Service Centre - the scale of recent permissions demonstrates Lyneham is capable of delivering market/affordable homes - more so than Pewsey or Cricklade.	Barratt Bristol; Gleeson Land; M7 Planning Ltd; Gladman.
<b>Settlement opportunities:</b> Lyneham benefits from a good range of services, facilities and transport links.	Barratt Bristol; Gleeson Land; M7 Planning Ltd.
<b>Housing requirement too low:</b> The settlement can take more growth as it now is a mixed community, not longer heavily influenced by the military; Lyneham has the highest self-containment index in the Community Area, which supports further growth. Unsound to acknowledge Lyneham is a sustainable location for growth but not to set out a requirement for further growth.	Gleeson Land; Gladman.
<b>Healthcare capacity:</b> Due to NHS capacity issues at Cricklade and Lyneham, there will be delayed delivery at these villages - supporting Lyneham as an alternative location for growth in the shorter term.	Barratt Bristol; Gladman.
<b>Commitments:</b> Land at Chippenham Road allowed at appeal is a commitment relied on for supply in the short term, and the Local Plan should include the site as a formal policy allocation. [Policy wording amendment proposed by the representor]	Bellway Homes.
<b>Sewage treatment buffer zone:</b> The sewage treatment works buffer as shown on the constraints map within the Rural paper is too large, and this should be reduced.	M7 Planning Ltd.

Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<b>Omission site promoted:</b> Land at Preston Lane/Victoria Drive.	Barratt Bristol.
<b>Omission site promoted:</b> Land off Farthing Lane.	Johnson Mowat.
<b>Omission site promoted:</b> Land at Chippenham Road.	Bellway Homes.
<b>Omission site promoted:</b> Land at Green Farm, Chippenham Road.	Gladman.
<b>Omission site promoted:</b> Land at Pound Farm.	Gleeson Land.
<b>Omission site promoted:</b> Land parcel to the rear of the sewage treatment works.	M7 Planning Ltd.
<b>Swindon HMA rural housing requirements: Purton (Large Village)</b>	
<b>Neighbourhood plan allocations as components of supply:</b> Concern that the neighbourhood plan for Purton will expire in 2026, and homes planned for within the NP do not cover the period 2027-2038 - leaving a gap in delivery per this part of the plan period.	Hills Homes.
<b>Settlement opportunities:</b> Insufficient consideration has been given to the sustainability of Purton to accommodate growth to meet future housing needs and to support existing facilities and services.	Castlewood Commercial Properties; Hills Homes.
<b>Proximity to Swindon:</b> The assessment does not reflect the proximity of Purton to Swindon and its employment opportunities and higher order facilities.	Castlewood Commercial Properties; Hills Homes.
<b>Settlement viability:</b> Curtailing further growth at Purton risks the vitality/viability of services and facilities; will worsen affordability, and accelerate an ageing population.	Hills Homes.
<b>Healthcare capacity:</b> Object to the assessment that concludes there are “NHS capacity constraints” - there is insufficient evidence to support this.	Castlewood Commercial Properties.
<b>Omission site promoted:</b> Land at Windham Farm.	Wainhomes.
<b>Omission site promoted:</b> Land at South Pavenhill Farm.	Castlewood Commercial Properties.
<b>Omission site promoted:</b> Land at Pavenhill.	Hills Homes.
<b>Omission site promoted:</b> Land to the East of Station Road, Purton	Taylor Wimpey Strategic Land.
<b>Swindon HMA rural housing requirements: Ramsbury (Large Village)</b>	
<b>Neighbourhood planning:</b> Concern that there is no anticipated timely delivery of a neighbourhood plan, with Ramsbury's residual requirement covering a large proportion of the overall rural area residual requirement.	Mssrs Gorrings, Bennett and Marks.

Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<b>Omission site promoted:</b> Land to the north of Newtown Road/south of Whittonditch Road.	Mssrs Gorringe, Bennett and Marks.
<b>Omission site promoted:</b> Upcott Field.	Rivar.
<b>Swindon HMA rural housing requirements: Shalbourne (Large Village)</b>	
<b>Housing requirement too low:</b> The redistribution of surplus equally across the rural settlements leads to nullification of the residual requirement at Shalbourne, which is unjustified. Redistribution should be applied on a pro rata basis.	Kington Farms Ltd.
<b>Swindon HMA rural housing requirements: Upavon (Large Village)</b>	
<b>Landscape:</b> Upavon is a more sustainable location for growth as it is not in the AONB, unlike other settlements in the Swindon Rural Area.	Kitewood Estates.
<b>Completions/commitments:</b> Completions/commitments at Upavon are from the Whistledown site, which were completed and sold between February 2021 – July 2022. As these have all been completed they should not be included as the main source of housing delivery for Upavon over the plan period.	Kitewood Estates.
<b>Omission site promoted:</b> Land south of Devizes Road.	Kitewood Estates.
<b>Swindon HMA rural housing requirements: Lydiard Millicent (Small Village)</b>	
<b>Settlement hierarchy:</b> Lydiard Millicent immediately adjoins the Swindon Urban Area where small-scale development that does not impinge upon local gaps between the SUA and rural settlement(s), should be considered acceptable because they are by definition in sustainable locations.	Hills Homes.
<b>Omission site promoted:</b> Land at Stone Lane.	Hills Homes.
<b>Swindon HMA rural housing requirements: Minety (Small Village)</b>	
<b>Settlement hierarchy:</b> The village has a range of services and facilities, equivalent to that of a Large Village and is comparable in size. The village should be reclassified as a Large Village.	Hannick Homes.
<b>Swindon HMA rural housing requirements: West of Swindon (Open Countryside)</b>	
<b>West of Swindon:</b> An area of search should be identified to the west of Swindon in order to meet the housing needs of Swindon.	Hollins Strategic Land.
<b>Omission site promoted:</b> Land at Nine Elms, Swindon.	Hollins Strategic Land.



Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<b>Trowbridge HMA rural housing requirements: Bratton (Large Village)</b>	
<b>Traffic impacts:</b> The village assessment does not acknowledge that the B3098 through Bratton is a regular route for HGV traffic, and the village is subject to traffic from drivers avoid the rush hour traffic at Yarnbrook.	Bratton Parish Council.
<b>Flood risk:</b> The assessment does not adequately consider surface water flood risk to the northern boundary.	Bratton Parish Council.
<b>Healthcare capacity:</b> Concern that pressure on capacity within local NHS healthcare services has not influenced the outcome for the village.	Bratton Parish Council.
<b>Trowbridge HMA rural housing requirements: Corsley (Large Village)</b>	
<b>Housing requirement too low:</b> The requirement should not be reduced to 0 homes when there is a need for housing for downsizers in the village.	Individual x1.
<b>Trowbridge HMA rural housing requirements: Dilton Marsh (Large Village)</b>	
<b>Proximity to Westbury:</b> Dilton Marsh is close to Westbury and benefits good accessibility, sustainable transport options - including a train station. The village should accommodate additional growth.	Dilton Marsh LVA LLP; Rosconn Strategic Land.
<b>Omission site promoted:</b> Land north of Clivey.	L&Q Estates.
<b>Omission site promoted:</b> Land south of Clivey.	Rosconn Strategic Land.
<b>Omission site promoted:</b> Land north of the High Street.	Dilton Marsh LVA LLP.
<b>Trowbridge HMA rural housing requirements: Hilperton (Large Village)</b>	
<b>Proximity to Trowbridge:</b> Further sites adjoining Hilperton are required to meet requirements at Trowbridge.	Barwood Land.
<b>Omission site promoted:</b> Land to the north of Hill Street / west of Greenhill Gardens.	Barwood Land.
<b>Trowbridge HMA rural housing requirements: Holt (Large Village)</b>	
<b>Housing requirement too low:</b> The approach to setting a nil requirement at Holt is contrary to national policy requirement to significantly boost the supply of homes.	European Property Ventures.
<b>Viability of services:</b> Holt is more sustainable village that should take additional growth, which will help to support viability of existing services and facilities.	European Property Ventures; Rosconn Strategic Land.
<b>Completions/commitments data:</b> Growth apportioned to Holt in Table 4.6 does not reflect planning permission for 90 dwellings secured at Melksham Road, Holt, allowed at appeal on 21st July 2023.	Gladman.

Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<b>Trowbridge HMA rural housing requirements: North Bradley (Large Village)</b>	
<b>Proximity to Trowbridge:</b> North Bradley is close to Trowbridge and benefits good accessibility to the Principal Settlement, and therefore the village should accommodate additional growth with a higher requirement.	Welbeck Strategic Land.
<b>Affordable housing need:</b> There is significant need for affordable housing in the area - as at 31st August 2023 there were 518 households on the Council's Housing Register specifying Trowbridge as a preferred location, and 5 households specifying North Bradley.	Welbeck Strategic Land.
<b>Trowbridge HMA rural housing requirements: Semington (Large Village)</b>	
<b>Change of Housing Market Area:</b> Object to moving Semington from the Chippenham HMA to the Trowbridge HMA as insufficient consultation has taken place on this; and there is a mismatch between Semington being in the Melksham Community Area/Melksham Area Board, but in the Trowbridge HMA for planning.	Semington Parish Council; Individuals x10.
<b>Neighbourhood planning:</b> Concern that delays to the production of the neighbourhood plan means that the village will not benefit from 'protection' soon enough from speculative proposals.	Semington Parish Council; Individuals x10.
<b>Landscape:</b> Concern that the Local Plan proposes a reduction in the gap between Hilperton and Semington by extending the boundary of north-east Hilperton up to Whaddon Lane and the new cycleway. This will reduce the rural nature of the Semington setting, which can't be mitigated by recreation space. A long term commitment to retain a gap should be made.	Semington Parish Council.
<b>Proximity to higher order settlements:</b> Semington is close to Melksham and Trowbridge benefits good accessibility, sustainable transport options, and a range of employment services and facilities. The village should accommodate additional growth.	Hollins Strategic Land; Wain Estates; Ashford Homes (South West); Cala Homes.
<b>Alternative location for growth:</b> Semington is well placed to diversify delivery, where Trowbridge has failed to deliver.	Wain Estates.
<b>Housing requirement too low:</b> Concern that the residual requirement of 0 stymies potential to plan for needed extra care provision due to an aging population.	The Orders of St John Care Trust.
<b>Omission site promoted:</b> Land at Turnpike Close.	Hollins Strategic Land.
<b>Omission site promoted:</b> Land at St George's Road.	Wain Estates.
<b>Omission site promoted:</b> Land at the High Street.	Ashford Homes (South West).
<b>Omission site promoted:</b> Land at High Street.	The Orders of St John Care Trust.

Key issues raised (Rural Areas/Rural Housing Requirements)	Respondent(s)
<b>Omission site promoted:</b> Land north of Pound Lane.	Cala Homes
<b>Trowbridge HMA rural housing requirements: Southwick (Large Village)</b>	
<b>Settlement opportunities:</b> Southwick is more sustainable village that should take additional growth.	Rosconn Strategic Land; Gladman.
<b>Omission site promoted:</b> Land adjacent 100 Frome Road.	Assetsphere.
<b>Omission site promoted:</b> Land at Wynsome Street	Gladman.
<b>Omission site promoted:</b> Land off Blind Lane	Wain Homes.
<b>Trowbridge HMA rural housing requirements: Steeple Ashton (Large Village)</b>	
<b>Education capacity:</b> Development at Steeple Ashton will rely on primary school places at Keevil. Keevil School is looking to reduce PANS allocations from 119 to 105 places, and children who live in Keevil Parish will be prioritised. This factor should be considered when considering the scale of growth appropriate Steeple Ashton.	Keevil Parish Council.
<b>Neighbourhood planning:</b> Steeple Ashton has a higher residual requirement than other settlements - it is more appropriate for this to be accommodated through a Local Plan allocation rather than through a neighbourhood plan.	Steven Graver Ltd.
<b>Omission site promoted:</b> Land off Edington Road.	Steven Graver Ltd.
<b>Trowbridge HMA rural housing requirements: Sutton Veny (Large Village)</b>	
<b>Nutrients:</b> Nutrient management issues should not be viewed as constraints which would delay housing delivery at Sutton Veny.	Homes Builders Federation.
<b>Trowbridge HMA rural housing requirements: Keevil (Small Village)</b>	
<b>Healthcare capacity:</b> Concern that parishioners face difficulties in accessing primary health care.	Keevil Parish Council.

## Local Plan section 5: Delivering the spatial objectives, Economic

**5.29** Please see below the key issues tables listing the key issues raised for the parts of the plan within section 5: delivering the spatial objectives (Economic policies), namely (also including 'delivering the spatial objectives' and 'introduction to delivering the spatial objectives' key issue tables):

- Delivering the spatial objectives
- Economic section overall
- Policy 64: Additional employment land
- Policy 65: Existing employment land
- Policy 66: Military establishments
- Policy 67: Sequential test and retail impact assessment
- Policy 68: Managing Town Centres
- Policy 69: Tourism and related development
- Policy 70: Sustainable transport
- Policy 71: Transport and new development
- Policy 72: Development impacts on the primary and major road networks
- Policy 73: Demand management
- Policy 74: Movement of goods
- Policy 75: Strategic transport network

Table 5.79 [Delivering the Spatial Objectives - Introduction] key issues

Key issues raised (Delivering the Spatial Objectives - Introduction)	Respondent(s)
<b>Consultation</b>	
<p><b>Consultation:</b> The consultation process that shaped the local plan (including Regulation 18 consultation) did not demonstrate effective engagement of interested parties which must include residents living close to proposed sites of development. The consultation process conflicts with the Council's Statement of Community Involvement, which promises early and active engagement with neighbourhoods impacted by development plans. By failing to consult on actual housing site options in Harnham until the final Regulation 19 plan, the Council has denied local residents the opportunity to consider alternatives or provide meaningful input on decisions affecting their community. A sound, justified local plan would have included community consultation on potential housing sites from the earliest stages</p>	Individuals x10.
<b>Spatial Vision</b>	
<p><b>Spatial Vision:</b> There should be strategic bids for major projects and venues. By having a strategic plan for infrastructure, whether educational, sporting or otherwise, it will help communities and the County development.</p>	Wiltshire Scullers.
<b>Infrastructure Provision</b>	
<p><b>Infrastructure Provision:</b> Under Outcomes, the third bullet point states: "The provision of new or improved infrastructure will have been positively supported and environmental impacts mitigated". We question the soundness of this wording, in relation to consistency with national policy. We would suggest the text is amended to: <i>'The provision of new or improved infrastructure will have been positively supported and environmental impacts <b>avoided or mitigated.</b>'</i></p>	National Trust.
<b>Green Belt Review</b>	
<p><b>Green Belt Review:</b> Trowbridge Town Council reiterates its support for a review of the West Wiltshire Green Belt to the north and west of the town. Greenbelt revision offers the most sustainable location for further significant development within 5km of the town centre, within walking distance of services and facilities such as; employment, education, shops, and the railway station</p>	Trowbridge Town Council.
<b>Climate change</b>	
<p><b>Climate Change:</b> The draft Plan provides no clear programme for delivery of its aspirations, no targets on anything but new homes and no plan or defined outcomes on addressing the many issues raised on climate change and adaptation. Monitoring, to ascertain whether policies have been successful in reducing the need to travel and shifting trips to more sustainable modes, is essential to both demonstrate real progress against a</p>	Wiltshire Climate Alliance.

Key issues raised (Delivering the Spatial Objectives - Introduction)	Respondent(s)
<p>baseline, and to highlight areas that need more effort or a different approach over time to achieve the goals. At present the Sustainability Appraisal, which should underpin the Plan, does not provide an effective mechanism to do this comprehensively and needs significant reinforcement if it is to achieve that aim</p>	
<p><b>Climate Change:</b> One major concern that recurs throughout the document is that, although Policy 4 starts to set direction for other policies to address climate change, those other policies do not recognise that. There needs to be more integration and less of a silo approach to policy development</p>	<p>Wiltshire Climate Alliance.</p>
<p><b>Strategic objectives</b></p>	
<p><b>Strategic Objectives:</b> The principal Strategic Objective set out within the Core Strategy (CS), which is retained within the LPR, is to deliver a ‘Thriving Economy’ (SO1). Paragraph 4.20 of the CS notes that the strategic housing requirement should be implemented flexibly to allow the Council to respond positively to opportunities: ‘...without being inhibited by an overly prescriptive, rigid approach which might otherwise prevent sustainable development proposals that can contribute to delivering the strategic objectives of the plan’. This should remain an operating maxim to be applied to the formulation of policies within the LPR, recognising that the NPPF requires that Plans should be prepared ‘positively, in a way that is aspirational but deliverable</p>	<p>Gleeson Land.</p>
<p><b>Strategic Objectives:</b> To be justified the Plan must be internally consistent in defining development objectives and ensuring that strategies are aligned in pursuit of sustainable development objectives. As constructed, the housing strategy and the employment strategies are misaligned; the positive intentions and ‘policy-on’ approach to the identification of employment land (the quantum of which exceeds that advocated by the LPR evidence base) is not matched by a similarly ambitious housing strategy, which instead opts to identify only the minimum that could be justified having regard to local housing need (LHN). The principal policies within the Plan are not consistent and the strategy pertaining to each is therefore unsound</p>	<p>Gleeson Land.</p>
<p><b>Strategic Objectives:</b> To address the shortcomings and inconsistency between the housing and economic / employment strategies of the LPR, the Council should have regard to the findings of its own evidence base, most notably the ORS Wiltshire Local Housing Needs Assessment, which highlights that the minimum local housing need (LHN) will be sufficient only to address a ‘policy-off’ approach to employment generation</p>	<p>Gleeson Land.</p>
<p><b>Strategic Objectives:</b> The objective in relation to housing growth is not positively prepared - it should refer to the housing requirement as a minimum. The NPPF, paragraphs 11(b) and 61 are clear that plans should meet objectively assessed needs for housing and other uses, as a minimum. Housing objective should be amended to read: “to deliver at least 36,740 new homes to meet objectively assessed needs”</p>	<p>Waddeton Park; Barratt Homes.</p>
<p><b>Review of the Wiltshire Core Strategy</b></p>	

Key issues raised (Delivering the Spatial Objectives - Introduction)	Respondent(s)
<p><b>Review of the Wiltshire Core Strategy:</b> The Draft Plan does not comprise a review of existing policies to ensure effective delivery of an existing spatial strategy, it in effect represents a new spatial strategy as embodied by a new approach to Housing Market Areas (HMA's), which fundamentally alters the way that development is distributed. The Council has not undertaken a review that assesses the effectiveness of existing policies</p>	Richborough Estates.
<p><b>Review of the Wiltshire Core Strategy:</b> Terming the Draft Plan as a 'Local Plan Review' creates an ongoing need to refer back to the Core Strategy, which itself contains a list of saved policies from the former district council's local plans that still form part of the development plan. This creates a historic document chain that impedes the accessibility and legibility of the Plan</p>	Richborough Estates.
<p><b>Review of the Wiltshire Core Strategy:</b> Labelling the Draft Plan as 'Local Plan Review' should not mean that the requirements of plan making and strategic policies set out in national policy can be circumvented. The fact that the Draft Plan does not cover the minimum 15-year period required by the NPPF is a fundamental issue of soundness</p>	Richborough Estates.

Table 5.80 [Economic] key issues

Key issues raised (Economic)	Respondent(s)
<b>Employment need and existing supply</b>	
<p><b>Assessment of Employment Land Need:</b> The Planning Practice Guidance sets out guidance on assessing the need for and supply of employment land. The assessment should be evidence-based, considering recent gains and losses to the stock and evidence of market demand. The current approach is deemed unsound as it is not consistent with national policy.</p>	Melksham Without Parish Council.
<p><b>Retention of Existing Employment Land:</b> The conclusions on Employment Land in the SA (page 45) suggest that retaining existing and allocated employment land is often challenging to manage. It recommends including policies that safeguard against incompatible uses or unnecessary loss of employment sites.</p>	Melksham Without Parish Council.
<b>Market towns (Melksham)</b>	
<p><b>Additional Employment Space:</b> The Wiltshire Employment Land Review Update suggests a need for more employment space. However, it does not consider the capacity created by the closure of Cooper Tires at the end of 2023, even though it is mentioned on Page 14.</p>	Melksham Without Parish Council.
<p><b>Spatial Strategy for Melksham:</b> The spatial strategy for Melksham's growth provides sites for nearly 90% of all forecast development needs but does not consider the potential of Cooper Tires or the un-let capacity of Avonside Enterprise Park.</p>	Melksham Without Parish Council.
<p><b>Allocation of Employment Land:</b> Difficult to understand the reasoning for allocating 5 hectares of employment land at Land East of Melksham in Policy 18. Suggest considering other sites such as Cooper Tires and SHELAA 1025 Land South West of Western Way. The current approach is deemed unsound as it is not justified.</p>	Melksham Without Parish Council.
<p><b>Consideration of Spatial Options:</b> The Wiltshire Local Plan should have considered spatial options for employment land and tested reasonable alternatives, ideally through the SA process. The current approach is deemed unsound as it does not look at any reasonable alternatives. The justification and evidence for allocating it in Land East of Melksham are questioned.</p>	Melksham Without Parish Council.
<b>Rural employment</b>	
<p><b>Agriculture's Influence on AONB:</b> Agriculture is a significant economic factor in the AONB. The AONB Partnership is working with DEFRA to improve the sustainability of farming practices in line with the Government's 25 Year Environment Plan. It is suggested that the term 'intensive' farming should not be used in para 5.6 and Policy 64.</p>	CCWWD AONB.



Key issues raised (Economic)	Respondent(s)
<p><b>Businesses in Rural Areas:</b> There is concern about businesses that do not need a countryside location moving to rural areas for financial reasons. This leads to increased commuting and delivery journeys on narrow country lanes, negatively impacting the AONB. It is recommended that Policy 64 be amended to promote employment expansion on the outskirts of town business parks, which are closer to employees' homes and main roads.</p>	CCWWD AONB.
<p><b>Policy 65 and AONB Locations:</b> There is concern that Policy 65, as currently worded, does not consider AONB locations or the potential impacts of expanding small businesses in sensitive rural areas. It is recommended that Policy 65 be amended to accommodate these AONB situations. This policy seems to have been drafted to protect employment land from being converted to residential use.</p>	CCWWD AONB.
<b>Landscape</b>	
<p><b>Conservation of AONBs:</b> There is concern that Policy 64 does not clearly show how the Planning Authority plans to conserve and enhance the natural beauty of the AONBs. It is suggested that the policy be refined to specify that employment developments within the AONBs should only be for activities that require an AONB location and comply with the relevant AONB Management Plan, Position Statements, and Good Practice guides.</p>	CCWWD AONB.

Table 5.81 [Policy 64 - Additional Employment Land] key issues

Key issues raised (Policy 64 - Additional Employment Land)	Respondent(s)
<b>Employment demand and supply</b>	
<b>Over provision of employment land:</b> Policy 64 provides unjustified employment land, particularly in the A350 Functional Economic Market Area (FEMA) around Trowbridge. Employment provision exceeds actual need and Policy promotes speculative development. Limit delivery of employment land to below 120ha.	Hilperton Parish Council with Hilperton Area Action Group
<b>Extend the Plan period:</b> This should cover at least 15 years and allocate further employment land accordingly.	Hills Homes; Stoford Developments Ltd.
<b>Expansion of existing employment sites:</b> Expand Policy 64 (i.e. criterion d. or add a new criterion) to encourage the use of additional land to enable the delivery of existing strategic employment allocations. Currently, the Policy only supports additional employment land on unallocated sites within or adjacent to settlements.	Hills Homes.
<b>Under provision of employment land:</b> Make further employment site allocations to provide certainty over the delivery of required growth. The anticipated supply of employment land is significantly below the identified level of demand, or even that proposed in the Plan. Increase the overall target and specifically increase it at Salisbury.	CEG; Stoford Developments Ltd; Miller Homes; Property Alliance Group Ltd.
<b>Greater clarity over employment assumptions informing level of housing provision:</b> More clarity on how factors such as economic growth have been considered to inform the housing requirement, and vice versa.	Miller Homes.
<b>Clarify monitoring process for delivery of employment land:</b> Further clarity is required to confirm that the delivery of employment sites will be subject to regular ongoing monitoring in order to ensure consistency of supply. The Plan seeks to make provision for 160ha of employment land from new sites and review of existing supply, informed by the Wiltshire Employment Land Review Update (ELRU) (September 2023). However, the ELRU (September 2023) summarises that only around 95ha may realistically come forward for employment development.	Miller Homes; Thames Valley Chamber of Commerce.
<b>Distribution of employment growth</b>	
<b>Consider community preferences for location of employment development:</b> Consider the preferences of residents, who do not favour large warehouses, manufacturing facilities, high buildings, and lorry movements. High buildings and lorry movements are not popular with residents. Reconsider the locations supported by Policy 64 for employment development, considering the preferences of the residents of Melksham. Support for additional employment land through exception Policy 64 is appreciated, but it cannot be relied upon due to the lack of available land and the type of industrial development required. Consider the type of industrial development required and the availability of land when supporting additional employment land. This policy supports employment development adjacent to the settlement boundary, which is not where residents of Melksham want large warehouses and manufacturing facilities.	Gompels Ltd.

Key issues raised (Policy 64 - Additional Employment Land)	Respondent(s)
<p><b>Limit development where there is already sufficient employment land:</b> The current policy allows for speculative economic development in Principal Settlements or Market Towns, including Trowbridge, Chippenham, and Salisbury. Priority should be given to brownfield sites. Strategic Planning Committee proceedings should be attended by three further senior officers of the Council to better advise enthusiastic local members. For example, High Post is a PEA with potential for modest future expansion. Stage 4 of the site selection process concluded with no site allocations proposed at Amesbury or High Post. Multiple failed planning applications in this location, many factually incorrect, that faced significant objections.</p>	CPRE Wiltshire; Individuals x10.
<p><b>Ensure that employment land requirements are realistic and tested against population growth to prevent unnecessary commuting and congestion:</b> The policy justifies development based on an employment land requirement that exceeds reasonable need and has not been tested against population growth. This could lead to increased commuting and congestion.</p>	CPRE Wiltshire.
<p><b>Rewrite Policy 64 to avoid promoting speculative employment land in unsuitable locations:</b> Additional employment land, such as along the A350, does not reduce the forecast employment demand in other HMAs, allowing for further speculative development.</p>	CPRE Wiltshire.
<p>Allocate Azimghur Barracks and Colerne Airfield, Colerne for employment with a bespoke policy to guide its development.</p>	Defence Infrastructure Organisation.
<p><b>Recognise settlements outside but close to the authority boundary:</b> The policy refers to unallocated sites adjacent to Principal Settlements, Market Towns, Local Service Centres and Large and Small Villages, all of which are located within Wiltshire. It pays no regard to other higher order major settlements on the boundary of the Council's administrative area such as Swindon. The policy should be amended to recognise urban areas, such as Swindon, which are closely related to the administrative boundaries of Wiltshire and where economic development could meet needs from both authorities.</p>	Pegasus Group.
<p><b>Include a wider range of employment uses:</b> The policy excludes consideration of non B2, B8 or E(g)(i-iii) uses adjacent to towns outside of the administrative area of Wiltshire. This restricts other employment generating developments falling outside of these use classes, such as car showroom and servicing at junction 16 of the M4. To ensure the plan provides flexibility and a framework for all types of employment generating uses, the policy should be changed to remove reference to specific use classes.</p>	Pegasus Group.
<p><b>The words 'and existing employment sites' should be added after small villages and the text 'where they are appropriate to the role and function of the settlement' should be deleted:</b> The policy supports employment development on unallocated sites within or adjacent to settlements but ignores the potential to deliver additional employment space on existing employment sites that are not within or on the edge of settlements.</p>	Kemble Business Park Estates.

Key issues raised (Policy 64 - Additional Employment Land)	Respondent(s)
<p><b>Part iii should be reworded to read ‘are aligned with the strategic economic priorities for Wiltshire, as specified in paragraph 5.4’:</b> Part iii of the policy introduces a subjective judgement on the extent to which a proposal is essential and provides no reassurance to an investor on its likely acceptability as a proposal.</p>	Kemble Business Park Estates.
<p><b>The text at (a) ‘are appropriate in scale with their location’ should be deleted:</b> Proposals will only be supported where they are appropriate in scale with their location, which is a meaningless policy test for sites that are not part of existing settlements.</p>	Kemble Business Park Estates.
<p><b>Agree with policy support for speculative proposals for employment development on unallocated sites within or adjacent to defined settlements:</b> A similar approach should be considered for housing to address the significant shortfall.</p>	Richborough.
<p><b>Allocate more sites at market towns:</b> Which have the potential for significant development that will increase the jobs and homes in each town, such as Malmesbury, which has no employment allocations. This would address the overall uncertainty around the delivery of employment sites, meet identified local housing and employment needs and support wider tourism, sustainability, and climate change objectives.</p>	Miller Homes.
<p><b>Allocate Land at London Road for mixed-use development:</b> Support strategy that allows employment development on unallocated sites at larger settlements, including market towns like Amesbury. Allocate Land at London Road for mixed-use development.</p>	Lincoln College Oxford.
<p><b>Align distribution of employment growth with employment trends:</b> Major employers in Wiltshire and the South West are gravitating towards more accessible locations like the M4 and A303 corridors, but it’s unclear if the assumed distribution of employment growth in the Plan aligns with this trend. Review and adjust the Plan to ensure the distribution of employment growth aligns with the trend of employers gravitating towards more accessible locations.</p>	Individuals x10.
<p><b>Match employment opportunities with housing in Salisbury:</b> (in reference to sites 8 &amp; 9 at Harnham, in Salisbury) The housing location does not match employment opportunities. To align housing figures with forecasted employment growth, they should be reduced by 5-10%, which is 225-450 homes. Reduce housing figures by 5-10% to align with forecasted employment growth and remove Sites 8 &amp; 9 from the Plan.</p>	Individuals x10.
<p><b>Strategic logistics (demand and supply)</b></p>	
<p><b>Introduce a specific strategic logistics policy:</b> Remove reference to strategic logistics from Policy 64 and replace with a bespoke criteria-based policy against which logistics developments could be assessed.</p>	GLP.

Key issues raised (Policy 64 - Additional Employment Land)	Respondent(s)
<p><b>Impact of automation:</b> Consider the impact of automation on employment when planning for logistics and warehousing. Logistics and warehousing are likely to become increasingly automated, reducing the requirement for employees.</p>	<p>CPRE Wiltshire.</p>
<p><b>Broader assessment of strategic logistics requirements needed:</b> Assess strategic logistics across a market area and consider alternative sites better linked to the rail network or more sustainable in other ways. Avoid identifying competing sites along the M4. The market for logistics sites, as admitted in Annex 2 of Appendix 5 (to the ELR), is much broader than one county, and there is a risk that sites will be identified along the M4 that compete with one another. The Local Plan Review (LPR) fails to adequately consider regional or national market demand for B8 logistics and distribution uses, or demand further along the M4 corridor. The LPR should be revised to better account for these demands.</p>	<p>CPRE Wiltshire; St Modwen Logistics and the Sealy Family Trust.</p>
<p><b>Alternative evidence highlights lack of supply:</b> Savills' evidence highlights a lack of supply along the M4 corridor, preventing larger regional/ national/international businesses from setting up new distribution centres. The supply of warehousing space is particularly limited along the M4 corridor, with just 0.56 years of supply in 2019 and 1.16 years' worth of supply in the wider south west market in 2023.</p>	<p>St Modwen Logistics and the Sealy Family Trust.</p>
<p><b>Failure to allocate sites for logistics:</b> Identify and plan for full objectively assessed need for strategic logistics, including site allocations. Prioritise sites with greater connectivity to the M4. The LPR includes reference to further growth along the M4 in Draft Policy 64, but fails to allocate any sites, instead relying upon developers to undertake significant costs and risk to secure a planning position. The LPR should allocate specific sites for development to reduce the burden on developers and encourage growth. According to Savills' analysis, there is only one site within the existing estates that could realistically accommodate an I&amp;L development. The Sustainability Appraisal acknowledges a shortage of previously developed land across Wiltshire. Unless the Council can identify additional sites that could accommodate I&amp;L development and develop strategies to make use of previously developed land, then it should allocate more land for strategic logistics.</p>	<p>GLP; St Modwen Logistics and the Sealy Family Trust.</p>
<p><b>M4 Junction 17:</b> Wiltshire Council should introduce policies relating to development around the M4 Junction 17, so that this is Local Plan led rather than developer led, which could lead to piecemeal encroachment into open countryside.</p>	<p>Langley Burrell Parish Council.</p>
<p><b>Take into account market signals:</b> The Local Plan policies do not effectively take into account relevant market signals and up to date evidence as required by para 31 of the NPPF. The Employment Land Review (ELR) underestimates the amount and type of new employment development required to meet demand. Revise the Local Plan policies and ELR to accurately reflect market signals, take into account up to date evidence, and address the true demand for new employment development.</p>	<p>St Modwen Logistics and the Sealy Family Trust.</p>

Key issues raised (Policy 64 - Additional Employment Land)	Respondent(s)
<p><b>Lack of consideration for current and future growth drivers and ‘suppressed demand’:</b> The Swindon and Wiltshire FEMA Assessment (2016) and the Wiltshire ELR (2023) do not consider current and future Industrial and Logistics (I&amp;L) growth drivers and do not account for ‘suppressed demand’ due to historic supply constraints. The methods outlined in the ELR are backwards-looking and don’t adequately assess current day market drivers and challenges. Savills’ methodology seeks to address these shortcomings and provide a more accurate estimate of future demand, focusing on market indicators and trends. Based on Savills’ demand methodology, over an 18-year Plan Period, they estimate Industrial and Logistics (I&amp;L) demand to be 1,156 – 1,297 ha of land. Depending on the level of apportionment, it is considered that Wiltshire Council should look to plan for 188 – 211 hectares of I&amp;L land over this period. Of Wiltshire’s total I&amp;L land requirement, a minimum of 26ha is needed for B8 units below 100,000 sq. ft. This benchmark is considered an appropriate proxy for local B8 needs. Update the methodologies of these assessments to consider I&amp;L growth drivers and account for suppressed demand.</p>	St Modwen Logistics and the Sealy Family Trust.
<p><b>Inaccurate labour demand models:</b> There are incorrect perceptions about the quality and pay of I&amp;L sector jobs, leading to an underestimation of local logistics and manufacturing demand. Labour demand models do not capture the co-location of office, research &amp; development, and administrative processes within I&amp;L activities. Correct these perceptions and revise labour demand models to better capture the full scope of I&amp;L activities.</p>	St Modwen Logistics and the Sealy Family Trust.
<p><b>Job estimates unreliable:</b> The danger in relying on job estimates as a way of estimating future employment land demand is demonstrated by the discrepancy between predicted and actual changes in manufacturing and transport and storage sectors. Use more reliable methods, such as ONS statistics, for estimating future employment land demand instead of relying solely on job estimates.</p>	St Modwen Logistics and the Sealy Family Trust.
<p><b>Lack of evidence to support assumption that 20% of demand can be accommodated on existing sites:</b> The Employment Land Review (ELR) provides limited justification for the assumption that 20% of demand can be accommodated on existing employment land, which is clearly overstated. Provide more robust justification within the ELR or adjust the assumption to reflect the capacity of existing employment land more accurately. The assumption that 20% of demand can be accommodated on existing sites is considered unrealistic due to the low current Industrial and Logistics (I&amp;L) availability rate of 4.2%. The process of gaining vacant possession for redevelopment is costly and time-consuming and may result in the displacement of existing tenants. Re-evaluate the assumption and consider strategies to mitigate the impact on existing tenants. Many of Wiltshire’s existing employment estates, such as Porte Marsh Industrial Estate and Bowerhill Industrial Estate, are already intensively developed with limited intensification potential and low availability at just 3%. The equilibrium level when supply and demand is broadly in balance is 8%. Explore opportunities for development in other areas.</p>	St Modwen Logistics and the Sealy Family Trust.

Key issues raised (Policy 64 - Additional Employment Land)	Respondent(s)
<b>Lack of evidence for figure of 23ha for strategic logistics demand:</b> The Employment Land Review (ELR) considers 23ha to be a reasonable notional figure as an indicator of demand based only on Turley's historic study for the British Property Federation (BPF). There is no analysis or evidence behind why this figure and estimates have been used. Provide a detailed analysis or evidence to justify the use of this figure and estimates.	St Modwen Logistics and the Sealy Family Trust.
<b>Strategic logistics (Junction 16 of the M4)</b>	
<b>Swindon Borough Council supports additional employment land development at M4 Junction 16:</b> Subject to impact assessments, non-prejudice to other growth, and secured funding for requirement improvements.	Swindon Borough Council.
<b>Amend policy to include a supportive framework for development around Junction 16 of the M4:</b> The policy provides a supportive framework for development at Junction 17 of the M4, but it is unclear why a similarly supportive framework for complimentary employment development could not be applied to Junction 16.	Pegasus Group.
<b>Allocate and develop Land at Junction 16 of the M4 for lorry parking facilities at Junction 16 of the M4:</b> Increases in HGVs due to planned logistics development and lack of additional parking facilities in the Local Plan. This site would have minimal landscape impacts and meet national objectives for enhancing parking facilities on the strategic road network, thereby increasing road safety.	Moto Hospitality Ltd.
<b>Allocate Land at Junction 16 of the M4, Swindon:</b> For non B2, B8 or E(g)(i-iii) uses, such as car showrooms.	Pegasus Group.
<b>Allocate Land at Spittleborough Farm, near Junction 16 of the M4, Swindon:</b> For strategic logistics and local employment development.	GLP.
<b>Strategic logistics (Junction 17 of the M4)</b>	
<b>Opportunities for logistics at Junction 17:</b> Junction 17 is central to the two Swindon Wiltshire Growth Areas and provides significant opportunities for logistics operations due to its transport connections.	St Modwen Logistics and the Sealy Family Trust.
<b>Greater cooperation to identify logistics need:</b> The policy supports additional regional and national logistics at M4 Jn17. Remove this support and instead promote wider cooperative work to derive genuine need along the M4 corridor.	CPRE Wiltshire.
Do not limit consideration of strategic logistics sites to around Junction 17 of the M4.	GLP.
<b>Lack of logistics allocations at Junction 17:</b> The Plan lacks specific allocations for strategic logistics at Junction 17 of the M4. The Plan identifies demand of 26ha.	CEG.
<b>Diversify the current logistics offer at Junction 17 of the M4:</b> Bring forward a range of medium and smaller-sized units to serve more localised markets.	CEG.

Key issues raised (Policy 64 - Additional Employment Land)	Respondent(s)
<b>Improve the capacity of Junction 17 of the M4:</b> Strategic logistics allocations will assist the delivery of planned improvements to Junction 17 of the M4.	CEG.
<b>Logistics allocation:</b> Allocate Land at Lower Swinley Farm for logistics.	CEG.
<b>Logistics allocation:</b> Allocate Land at Stanton Park for logistics.	Stoford Developments.
<b>Allocation land at Junction 17 for logistics:</b> Allocate land near Junction 17 of the M4 for a new logistics hub. This site's advantages, excellent highway connections, and the urgent need for B8 sites justify its allocation. Only sites southeast of Junction 17 of the M4 are well-related to existing infrastructure and landscape features. The site would primarily employ from Chippenham.	St Modwen Logistics and the Sealy Family Trust.
<b>Term 'adjacent to' restrictive:</b> Current policy overly prescriptive and unclear and suggest revisions for clarity. The term 'adjacent to' M4 Junction 17 as restrictive and suggest a less limiting policy.	St Modwen Logistics.
<b>Address high out-commuting by providing employment at Junction 17:</b> High out-commuting levels from Chippenham and job leakage to surrounding areas can be addressed by providing employment at the Junction 17 logistics hub and forming a Local Labour Agreement for Phase 3 of the St Modwen development. The site, located near deprived areas, can offered a variety of types of employment to benefit these areas. Support for Phase 3 employment development would meet immediate needs, especially for land near an M4 junction.	St Modwen Logistics.
<b>Strategic logistics (other locations, including the A303)</b>	
<b>General policy support for logistics development rather than specific allocations:</b> It's not advisable to allocate sites purely for logistics due to the inability to identify the exact level of demand. However, there should be policy support for further land for employment use at suitable locations along the M4 and A303 corridors. Consider allocations close to Salisbury, particularly at Solstice Park, due to its success in attracting new employment.	Classmaxi Limited; Lincoln College Oxford.
<b>Employment allocations not supported by the evidence base:</b> Plan allocates land for national and regional logistics development against the recommendations of the employment land review. It only allocates land adjacent to M4 Junction 17 and not land adjacent to the A303 at Earl's Farm Down. A proportion of Earl's Farm Down could accommodate logistics as well as local employment demand. For Policy 64 to accord with the evidence base, either the proposed allocation of land for logistics adjacent to M4 junction 17 should be deleted or land at Earl's Farm Down adjacent to the A303 should be allocated alongside it.	Classmaxi Limited; Lincoln College Oxford.
<b>Rural employment</b>	



Key issues raised (Policy 64 - Additional Employment Land)	Respondent(s)
<p><b>Remove references to ‘intensive farming’:</b> Remove references to ‘intensive farming’ in Policy 64 and its supporting text because of the adverse effects of the practice on the AONB sustainability efforts. Agriculture is a significant economic factor in the AONB. The AONB Partnership, in conjunction with the Government’s 25 Year Environment Plan, is aiding DEFRA in improving the sustainability of farming practices.</p>	<p>CCWWD AONB; North Wessex Downs AONB.</p>
<p><b>Support edge of settlement employment development:</b> Encourage employment expansion on the edges of settlements because of the adverse effect of businesses relocating to rural areas.</p>	<p>CCWWD AONB.</p>
<p><b>Reference AONB requirements:</b> Refine Policy 64 to include specific references to AONB-related requirements. There is a lack of specificity in the Policy regarding AONB conservation.</p>	<p>CCWWD AONB.</p>
<p><b>More flexible employment policies for rural areas that align with the NPPF:</b> Reintroduce the flexibility that was previously in place with Policy BD5 of the North Wiltshire Local Plan 2011, which supported B1/B2/B8 business uses in the countryside subject to highways considerations and limitations around building and impact on surroundings. Ensure that the local policy framework aligns with the NPPF, particularly with regards to the need for flexible employment policies and the recognition that sites to meet local business needs may need to be located outside of settlement boundaries. Neither the adopted or emerging local policy framework for Wiltshire aligns with paragraphs 82-85 of the NPPF, which recognise the need for employment policies to be flexible and accommodate different needs and working practices.</p>	<p>Neil and Jane Stanley; Conlon Ltd.</p>
<p><b>Allocate employment areas for ‘undesirable uses’:</b> Allocate appropriate designated employment areas for ‘undesirable’ uses in the local plans. There are insufficient suitable sites allocated in the local plans for ‘undesirable’ uses such as waste handling and skip hire.</p>	<p>Neil and Jane Stanley.</p>
<p><b>Support diversity of rural businesses:</b> The focus on Principal Settlement Areas overlooks the potential of rural businesses and areas outside settlement boundaries. The emerging plan is considered unsound due to its failure to support the diversity of rural-based businesses. Support the inclusion of additional clauses that presume support for farming and for the diversification of rural businesses. This would provide clearer guidance and encouragement for these sectors.</p>	<p>SW Group Logistics; Calne Without Parish Council.</p>
<p><b>Reduce reliance on windfall sites in rural areas:</b> Allocate Land South of Middleton Road, Winterslow for mixed-use development and reduce reliance on windfall sites in rural areas. The Plan is not sound for its reliance on windfall sites and lack of a deliverable strategy for meeting housing need.</p>	<p>Primetower Properties.</p>
<p><b>Avoid the loss of local farms to development:</b> The Council has closed local farms for development, but Policy 64 notes that rural areas will be made available for farming. The cost of acquiring new sites for farming could be avoided by maintaining those already in use. Reconsider the closure of local farms and align development plans with Policy 64 to preserve farming in rural areas. The cost of acquiring new sites for farming</p>	<p>Individual x10.</p>

Key issues raised (Policy 64 - Additional Employment Land)	Respondent(s)
could be avoided by maintaining those already in use. Prioritise the maintenance and use of existing farming sites to avoid unnecessary acquisition costs. There are no financial details provided about the revenue and costs associated with these changes. Provide transparent financial details about the revenue and costs associated with the changes for better decision-making and accountability.	
<b>Lack of highly skilled and highly paid roles:</b> No clear detail on how the additional residents from the 36,740 new homes across the County will be employed in high skilled and highly paid roles.	Apsley Precision Engineering Ltd.
<b>Co-location of residential and employment development:</b> Employment land identified alongside residential developments could cause issues as residents may complain about noise and manufacturing companies require privacy and different utility and service requirements. Lack of clarity on the distance between employment land and residential developments. The well-established business park at High Post is not mentioned in the plan.	Apsley Precision Engineering Ltd.
<b>Provide clarity on ‘adjacent to’ in Policy 64:</b> Policy 64 guidelines are not always interpreted in a consistent manner. For example, the term “adjacent to” can be up to 5 miles from Principal Settlements, Market Towns, Local Service Centres, and Large and Small Villages, which may impact employers or employment land. Provide a clear definition of “adjacent to” in the context of the plan.	Apsley Precision Engineering Ltd.
<b>Lack of employment provision drive local businesses away:</b> Apsley Precision Engineering, the largest independent sub-contract engineering company in Wiltshire, may need to move outside Wiltshire if they are unable to build appropriate premises in the Salisbury area. Lack of support or detailed clarity on employment locations could force such mature and growing businesses to move away, turning Wiltshire into a commuter County.	Apsley Precision Engineering Ltd.
<b>Small business development</b>	
<b>More provision of small business units:</b> Difficulty for small businesses, which make up around 98% of local businesses, to access and remain in operational spaces in their local communities. Consider providing small business units across the county that are accessible to local small businesses.	Federation of Small Businesses.
<b>Need for adequate infrastructure and connectivity:</b> Small businesses require adequate infrastructure, connectivity, and access to customers and staff to prosper. Wiltshire has relatively poor mobile phone connectivity. Ensure all employment locations have adequate infrastructure and connectivity, including faster broadband speeds for those who work from home. Improve mobile phone connectivity across the county.	Federation of Small Businesses.
<b>Increase provision of Electric Vehicle charging points:</b> There is a need for Electric Vehicle (EV) charging points for local businesses to confidently switch their fleet/business vehicles over to electric.	Federation of Small Businesses.

Key issues raised (Policy 64 - Additional Employment Land)	Respondent(s)
<p><b>Consider local employment opportunities alongside new housing:</b> When new housing is created, employment provision is as important as educational and healthcare facilities. Local businesses enhance the character of a place, making it more desirable to live and work there. Consider employment provision when creating new housing. Provide local employment opportunities to minimize travel and encourage the use of sustainable transport methods.</p>	Federation of Small Businesses.
<p><b>Need for dynamic mixed-use developments:</b> There is a need for dynamic mixed-use developments, not just housing, to encourage more vibrant areas in towns and smaller settlements. Encourage the provision of dynamic mixed-use developments to boost pride in place and improve social outcomes.</p>	Federation of Small Businesses.
<p><b>Lack of access to construction opportunities:</b> Difficult for smaller local home builders to access construction opportunities. Consider ways to make construction opportunities more accessible to smaller local home builders to boost the local economy and grow the local construction community.</p>	Federation of Small Businesses.
<b>Cross-boundary co-operation/West of Swindon</b>	
<p><b>Acknowledge impact of M4 Junction 16 development on Swindon:</b> Acknowledge the potential impact of employment development around M4 Junction 16 on neighbouring authority, i.e. Swindon Borough Council, and its services. Issues raised linked to earlier discussions on economic growth, infrastructure, and cooperation.</p>	Swindon Borough Council.
<p><b>Lack of joint working with Swindon despite previous commitment:</b> The approach adopted by both Swindon and Wiltshire Councils is not consistent with previous commitments to joint working. The current spatial strategy options do not adequately address the specific needs of Swindon, particularly in terms of housing and employment land provision. The strategy for housing delivery at Swindon is not deemed appropriate, and there is a lack of an overarching strategy for the delivery of employment land to meet inward investment needs.</p>	Thames Valley Chamber of Commerce.
<p><b>Identify Swindon as a Principal Settlement:</b> Then allocate additional employment land, including designating Principal Employment Areas, at West of Swindon to recognise Swindon's specific needs.</p>	Thames Valley Chamber of Commerce.
<p><b>Allocate Land at Chelworth Industrial Estate for employment:</b> The current policies do not adequately allocate land for employment and housing needs in Swindon and Wiltshire, particularly at the Chelworth Industrial Estate, Cricklade and within the Swindon Housing Market Area.</p>	SW Group Logistics Ltd.
<b>Transport/access</b>	
<p><b>Clarify meaning of 'unacceptable' impact on local transport network:</b> The wording in item e of the policy is vague, particularly the term 'unacceptable' in the context of impacts on the local transport network. The policy should be revised to clarify what constitutes 'unacceptable' impacts, specifically focusing on user safety.</p>	Cycle Chippenham.

Key issues raised (Policy 64 - Additional Employment Land)	Respondent(s)
<p><b>Access to sustainable transport modes:</b> The policy does not refer to achieving suitable access by sustainable modes of transport, as required by NPPF paragraph 110. The policy should be updated to include references to sustainable modes of transport.</p>	Cycle Chippenham.
<p><b>Lack of priority to non-vehicular modes of transport:</b> The policy does not give priority to people walking, wheeling, and cycling, and does not facilitate high-quality public transport to minimise the need for access by private car, this should be amended to suggest so. Maintain the current item f as the new item g.</p>	Cycle Chippenham.
<p><b>Impact on the strategic road network:</b> Expand criterion (e) of Policy 64 to include the strategic road network (SRN) to ensure that the safe and efficient operation of the SRN is also maintained in line with DfT Circular 01/2022. Presently, the criterion only covers impacts on the local transport network, whereas this change would also encompass potential impacts on, for example, the M4. However, National Highways will not support any proposals where they have a severe or unacceptable impact on the SRN. They have concerns about the potential need for additional infrastructure improvements beyond those currently planned.</p>	National Highways; Royal Wootton Bassett Town Council.
<b>Employment use classes</b>	
<p><b>Consider wider range of employment Use Classes:</b> The current list of Use Classes is restrictive, limiting opportunities for developments classed as 'sui generis'. Propose additional wording to enable developments that could meet the criteria in Policy 64 while bringing economic development, such as car dealerships and Electric Vehicle charging stations. Expand to include Use Classes E(c)(i)-(iii), which would allow for financial services, professional services, and other appropriate services in a commercial, business, or service locality. The current policy only extends to classes B2, B8, or E(g)(i-iii). Remove the reference to 'only' from criteria (a)-(f) to clarify the underlying flexible approach.</p>	Property Alliance Group Ltd.
<b>Neighbourhood plans</b>	
<p><b>Determining strategic need:</b> The Local Plan itself should address the more strategic requirements for both housing and employment rather than leave it to Neighbourhood Plans to assess the need for and identification of sites.</p>	Thames Valley Chamber of Commerce.
<p><b>Emphasise community engagement:</b> Support community engagement in unanticipated employment proposals. Expand Policy 64 to this effect. Emphasises role of local communities in assessing and contributing to employment growth proposals.</p>	Durnford Parish Council.
<p><b>Coordination with employment allocations in neighbourhood plans:</b> There is a potential impact on the viability of the Joint Melksham Neighbourhood Plan 2 (JMNP2) employment allocations. The Employment Policy is broadly in conformity with JMNP1 P10, but there is a lack of clarity in Clause D. The clause should be clarified to include the impact on the viability of existing allocated/retained Principal Employment Land. The allocation</p>	Melksham Town Council.

Key issues raised (Policy 64 - Additional Employment Land)	Respondent(s)
of Cooper Tires is likely to include employment, but there may be a lack of coordination with the employment allocation east of Melksham. There should be better coordination with the employment allocation east of Melksham. The policy should ensure that there is no impact on the viability of JMNP2 employment allocations.	
<b>Landscape, biodiversity and conservation</b>	
<b>Biodiversity protection:</b> Include provision for protecting biodiversity in Policy 64. The Policy includes provisions for protecting landscape and heritage interests but not biodiversity.	Natural England.
<b>Impact on AONB:</b> Revise Policy 64 to demonstrate how the LPA plans to conserve and enhance the AONB's natural beauty.	North Wessex Downs AONB.

Table 5.82 [Policy 65 - Existing Employment Land] key issues

Key issues raised (Policy 65 - Existing Employment Land)	Respondent(s)
<b>Protecting and enhancing existing employment land</b>	
<p><b>Omit reference to Principal Employment Areas:</b> The first part of the policy provides encouragement to the renewal and intensification of employment use, with an emphasis on ‘particularly in Principal Employment Areas’. This additional reference to Principal Employment Areas is not necessary as the support given to renewal and intensification applies to all employment sites.</p>	Kemble Business Park Estates.
<p><b>Omit reference to the role and function of individual settlements:</b> The second part of the policy safeguards land in employment use because of their contribution to the Wiltshire economy ‘and the role and function of individual settlements’. This language is unnecessary as many of Wiltshire’s employment sites are not within settlements.</p>	Kemble Business Park Estates.
<p><b>Include excluded areas of existing employment land within concept plans:</b> Policy 65 supports the renewal and intensification of employment uses, particularly in Principal Employment Areas, and the retention of all land in employment use. However, the policy also states that new uses on sites adjacent to employment uses must be compatible with the continued operation of the employment use. Areas of excluded existing employment land within the centre of a site should be incorporated into concept plans. This would allow any subsequent redevelopment of the site to successfully incorporate existing and new uses into a holistic development.</p>	Castlewood Property Ventures.
<p><b>Protect existing employment land and allow for growth in Malmesbury:</b> The ELR (September 2023) identifies a potential shortfall of new employment land to meet identified demand, including at Malmesbury. It is important that the Plan seeks to protect existing employment land, alongside identifying additional employment land. The Plan must protect existing employment land and allow for growth around Malmesbury to support both its employment function, meet local housing need and support its role as a tourist destination. The approach taken towards employment land should be aligned with ensuring the provision of sufficient housing.</p>	Miller Homes.
<p><b>Extend existing employment site in Wilton:</b> Extend the boundary of the Principal Employment Area in Wilton to the west to include both the Naish Felts site and the (Wiltshire-Council-owned) salt depot.</p>	Naish Felts Limited.
<p><b>Develop existing employment at High Post:</b> Reflect the development of the existing employment cluster at High Post, which would help safeguard approximately 100 jobs with the existing businesses being relocated to High Post.</p>	Naish Felts Limited.
<p><b>Clarify Principal Employment Area status:</b> Clarify why Langley Park Industrial Estate is not identified as a Principal Employment Area, despite supporting approximately 75,000 sqm gross floor area of Use Class E, B2, and B8 employment uses.</p>	SCREIT Property Limited.

Key issues raised (Policy 65 - Existing Employment Land)	Respondent(s)
<p><b>Concerns about Melksham employment allocation:</b> Concern that the 5-hectare employment allocation (in Melksham) might undermine the viability of existing principal sites, including Avonside and Cooper Tires.</p>	Melksham Town Council.
<p><b>Redevelopment for alternative uses</b></p>	
<p><b>Broaden criteria for determining attractiveness of employment sites to the market:</b> The age of an existing employment site is not the only/main factor determining whether the redevelopment of an existing site to an alternative use is appropriate. Consider other factors such as the site's attractiveness to the employment market and its suitability for employment development.</p>	Persimmon Homes (South Coast) Ltd & Persimmon Homes (Wessex) Ltd.
<p><b>Vacancy period excessive:</b> Policy 65 appears to accept that exiting employment areas can remain undeveloped/unlet for at least 5 years before they are considered for alternative development uses. The approach of Policy 65 stifles the supply of land which may be suitable for housing, by delaying the release of land for a period of at least 5 years. Review the policy to consider how land remaining unsold or unlet for five years impacts the strategy to deliver a thriving economy. Reconsider the policy's approach to balance the needs for employment land and housing, particularly in areas with identified shortfalls in housing supply.</p>	Persimmon Homes (South Coast) Ltd & Persimmon Homes (Wessex) Ltd.
<p><b>Reassess viability of existing employment sites:</b> The Local Plan Review identifies a need for additional employment floorspace and a review of existing Principal Employment Areas. Sites like Upside Melksham, for example, and Principal Employment Areas need reassessment for their viability as employment sites. If they lack meaningful employment function, alternative uses should be considered. For instance, existing employment areas should be considered as genuine opportunities for increased housing delivery, given the shortfall in housing supply at the Salisbury HMA. Review Policy 65 to permit the alternative use of employment land, particularly in circumstances where there is an identified shortfall in housing supply. The Principal Employment Area designation is criticised for protecting existing employment rather than increasing it.</p>	The Stantonbury Building and Development Company; Persimmon Homes (South Coast) Ltd & Persimmon Homes.
<p><b>Clarify the conditions under which the replacement of lost employment land is required:</b> This would provide more flexibility for the development of sites where there is no longer a requirement for employment land. The policy requires that where a proposal would lead to a material loss of employment land, provision must be made for its replacement with employment land of similar size and quality nearby, unless it can be demonstrated that there is no longer a requirement for employment land in that location.</p>	Backhouse Housing Ltd.
<p><b>Excessive marketing period:</b> Policy 65's five-year vacancy requirement contradicts the National Planning Policy Framework's emphasis on flexibility and effective land use. It's suggested to remove this requirement. The policy's inconsistency is highlighted, with a five-year vacancy requirement versus a 12-month marketing requirement. A shorter marketing period, from 6 to 12 months, no more than two years at most, would be better.</p>	McCarthy Stone Retirement Lifestyles Ltd; Gaiger Bros; SREIT Property Limited; Backhouse Housing Ltd; The Stantonbury Building and Development Company; Martingate Corsham.

Key issues raised (Policy 65 - Existing Employment Land)	Respondent(s)
<p><b>Need for older people accommodation:</b> The draft Policy 65 (Existing Employment Land) does not consider the acute need for older persons accommodation in Wiltshire. Add an additional criterion to the policy that allows for the replacement use proposed if it is evidenced and would outweigh the benefits of retaining the site as an employment location.</p>	Frontier Estates Ltd.
<p><b>Over supply of employment land at Trowbridge:</b> The spatial strategy for Trowbridge shows an imbalance with more supply than demand for employment land. It's suggested to re-evaluate this strategy. The lack of development on employment sites, resulting in vacant land, calls for an investigation into the causes and potential growth strategies. Three proposed employment sites from the Wiltshire Core Strategy remain undeveloped. It's suggested these sites could be repurposed for residential development to meet housing needs.</p>	Keevil Parish Council.
<p><b>Clarify future employment development plans for High Post, Amesbury:</b> The Local Plan Review's ambiguity about future development at High Post and the lack of priority for brownfield sites are criticised. Suggestions include clarifying conditions for future development, implementing a 'Brownfield First' policy, and refusing applications with errors. Concerns about developments in Amesbury and High Post have been raised, and it's suggested that the council consider these when reviewing applications. The current application for High Post fails to meet policies and guidelines, and it's suggested to refuse it and reconsider criteria for greenfield sites.</p>	Individuals x10.
<p><b>Non-employment uses on existing employment sites</b></p>	
<p><b>Policy should not apply to non-employment uses on existing employment sites:</b> The policy applies to all uses, including those on existing employment sites which are allocated for non-employment uses. This places an unjustified and onerous requirement onto sites already demonstrated through the allocation process to be sustainable for non-employment use. Where previous employment land has been allocated for an alternative use, it should not be subject to the constraints set out in this policy to enable the delivery of sustainable development. Amend the 3rd paragraph to clarify that proposals involving the loss of existing employment premises or undeveloped land within Employment Areas must demonstrate certain conditions. Concerns that potential enhancements to non-employment premises within Employment Areas would be captured by the Policy requirement under points i, ii, and iii of the 3rd paragraph, which seeks to protect the loss of employment land. Define 'employment' clearly within the policy or supporting text. Clarify whether the references to 'employment land' and 'employment use' apply to land designated as Employment Areas, or any premises currently in use for employment purposes.</p>	Wadworth & Co Ltd.; Backhouse Housing Ltd; Asda Stores Ltd.
<p><b>Greater flexibility over employment uses:</b> The policy is also seen as lacking sophistication in recognising that specific parcels of land support specific types of employment. A refinement to account for this is proposed. The policy could lead to vacant properties on High Streets due to changing shopping habits, and it's suggested to allow flexibility in property use, including reverting to residential use.</p>	Martingate Corsham.



Key issues raised (Policy 65 - Existing Employment Land)	Respondent(s)
<b>Loss of employment land</b>	
<p><b>Clarify distinction between ‘land in employment use’, ‘employment areas’ and ‘employment land’:</b> ‘Land in employment use’ is distinct from land which has an employment use consent/allocation but is not in active use, or is yet to be developed. The effectiveness of Policy 65 is questionable, particularly in terms of the three criteria applied when considering proposals involving the loss of employment land. Review and revise the criteria to ensure they are effective and relevant.</p>	<p>Persimmon Homes (South Coast) Ltd &amp; Persimmon Homes (Wessex) Ltd.</p>
<p><b>Inconsistent with national policy:</b> The policy is considered unsound as it conflicts with national policy and is not justified. It sets out requirements for proposals involving the loss of employment land, stating that it must be demonstrated that provision is made for replacement employment land, and that the site is no longer suited to current and future business needs. The policy should be consistent with national policy, which means enabling the delivery of sustainable development in accordance with the policies in the national planning policy framework.</p>	<p>Wadworth &amp; Co Ltd.</p>
<b>Cross boundary working/ West of Swindon</b>	
<p><b>Policy does not address needs of Swindon:</b> The current policy framework and spatial strategy options inadequately address Swindon’s needs, particularly in terms of housing and employment land provision. The strategy for housing delivery at Swindon is deemed inappropriate, and there’s a lack of an overarching strategy for delivering employment land to meet inward investment needs. The approach adopted by both Swindon and Wiltshire Councils is inconsistent with previous commitments to joint working. A more comprehensive, long-term vision and strategy are needed, particularly to secure the investment in strategic infrastructure that Swindon needs to maintain its competitive role in the local economy. This includes addressing the need for a longer-term 2050 vision that maximises the potential to align economic, spatial and land use planning to provide the framework for long-term strategic planning and infrastructure provision.</p>	<p>Thames Valley Chamber of Commerce Group.</p>
<b>Rural employment</b>	
<p><b>Businesses in rural areas:</b> Policy 65, as currently worded, does not consider AONB (Area of Outstanding Natural Beauty) locations and the potential impacts of expanding small businesses in sensitive rural areas. Amend Policy 65 to take into account AONB locations and the potential impacts of business expansion in these areas, like increased rural traffic. The policy has likely been drafted to protect employment land from being converted to residential use, which may not be suitable for all AONB situations. Revise Policy 65 to accommodate different AONB situations, ensuring a balance between protecting employment land and preserving the natural beauty of these areas.</p>	<p>CCWWD AONB, North Wessex Downs AONB</p>

Key issues raised (Policy 65 - Existing Employment Land)	Respondent(s)
<p><b>Allow development on existing employment sites in Large Villages:</b> The new policy should follow the template of the current policy, allowing new development to come forward on existing employment sites in larger villages. Object to Policy 65 of the Local Plan Review, which protects existing employment land. The existing Core Strategy allows for the redevelopment of employment land in large villages, provided there is evidence that the site has no long-term strategic requirement to remain in employment use and that the site is no longer viable for its present or any other employment use. For instance, Land at Station Road, Collingbourne Ducis, should be allocated for 30 dwellings and that there would be no adverse impacts through the loss of the land for residential.</p>	Acorn Construction (Newbury) Ltd.
<p><b>Remove references to ‘intensive farming’:</b> The term ‘intensive’ farming in Policy 64 and para 5.6 is seen as inappropriate considering the AONB Partnership’s sustainability efforts. It’s suggested to remove or replace this term.</p>	North Wessex Down AONB.
<p><b>Recognise farm diversification:</b> The policy does not recognise the contribution of farm diversification schemes to rural employment and enterprise opportunities. It’s suggested that the policy should acknowledge these schemes’ importance. The policy also lacks support for business locations benefiting from these schemes. It’s proposed that the policy should support these locations, enabling in situ development and growth of enterprises.</p>	LD&PC Ltd.
<b>Other</b>	
<p><b>Principal Employment Area (PEA) designation should cover the whole of the Police HQ site:</b> The emerging policies map replicates the existing Police HQ employment allocation from the Core Strategy, allocating most of the existing buildings and car parks, plus the undeveloped land in the northern part of the site, as a Principal Employment Area. However, it omits certain areas that are in daily use for operational police purposes. The Principal Employment Area allocation should cover the whole Police HQ site, including the omitted areas such as the former Helicopter Hangar, the Dog Unit and associated kennelling, and a modular storage building erected in 2023. No distinction can be drawn in terms of land use between the currently allocated and unallocated sections of the Police HQ site for the purposes of Policy 65. The policy should recognise that the whole site operates as a single planning unit and is used for Police HQ functions.</p>	The Police and Crime Commissioner for Wiltshire and Swindon; The Chief Constable of Wiltshire Police.
<p><b>Reform scrutiny of planning applications:</b> The proceedings of the Strategic Planning Committee need reforming to ensure serious scrutiny of proceedings. Reform the Strategic Planning Committee to include attendance by 3 further senior officers of the Council.</p>	Individuals x10.
<p><b>Policy support:</b> Support for Policy 65 Existing Employment Land.</p>	Tisbury Parish Council.

Table 5.83 [Policy 66 - Military establishments] key issues

Key issues raised (Policy 66 - Military establishments)	Respondent(s)
<b>General policy related concerns</b>	
<b>Considerations for development within a statutory safeguarding zone:</b> The wording of Policy 66 should be updated to make it clear that development proposed, within a statutory safeguarding zone, that would impact on the operation or capability of safeguarded sites or assets, would not be supported	MoD Safeguarding Manager – Defence Infrastructure Organisation.
<b>Details are required regarding the process for site disposal:</b> Policy 66 should be strengthened in relation to the expected process for site disposal. There is a danger that a site could be sold to a single developer, prior to any local community engagement in master-planning. Whilst paragraph 5.15 refers to master-planning incorporating the local community, this should be included within the actual policy wording.	Colerne Parish Council.
<b>Redundant military site re-use should not be focused solely on employment use:</b> Concerned that the focus of the re-use of redundant military establishment is on employment use and that other uses will only be considered where there is evidence that employment uses are not a practical proposition. Such an approach is unjustified, restrictive and no guidance is given regarding ' <i>practical proposition</i> '. Non-employment uses may be the most appropriate use for a site. The ' <i>employment first</i> ' approach should be reconsidered. If this does not occur, clarification of the term ' <i>clear evidence that employment uses are not practical proposition</i> ' is required.	Presscredit (Rudloe) Ltd.
<b>The master-planning approach advocated by this policy, must actually be implemented when considering potential sites:</b> The policy advocates a 'master-planning' approach in determining appropriate uses for redundant site in collaboration with the Local Authority.	Presscredit (Rudloe) Ltd.
<b>Definition of the term 'Isolated' is required:</b> No definition of "isolated" is given within the Policy. Clarification of this term is required	Presscredit (Rudloe) Ltd.
<b>Further clarification is required within the policy of the term 'redundant military establishment':</b> The definition of a 'redundant military establishment' is not clear. Once a facility has an established alternative use then the facility is no longer redundant and its military function has ceased. Policy 66 would no longer be applicable. This should be made clear within the policy	Kemble Business Park Estates.
<b>Part i) presents an artificial barrier to the re-use of redundant military facilities and should be deleted:</b> Part i) of the Policy is contradictory as it requires sites are well-related to existing settlements in terms of location and scale. The Policy recognises that military establishments are located outside settlement boundaries and, due to their function and role, would not normally have any connection to the nearest settlements, as such, Part i) should be deleted as this would put an artificial barrier to the re-use of such facilities	Kemble Business Park Estates.

Key issues raised (Policy 66 - Military establishments)	Respondent(s)
<p><b>Landscape:</b> The policy does not recognise that some military sites are within or adjoining National Landscapes. The policy should clarify that proposals take account of these landscape sensitivities.</p>	<p>Cranborne Chase Area of Outstanding Natural Beauty.</p>
<p><b>Site specific related comments</b></p>	
<p><b>An additional allocation policy is required in relation to the MoD sites at Colerne Airfield and Azimghur:</b> Although the Representor is supportive of Policy 66 for both operational and redundant military establishments, it is considered the policy is not suitable in relation to the MoD sites at Colerne Airfield and Azimghur, which will become redundant during the plan period. A bespoke, plan-led site allocation policy is required for these sites. The Representor provides wording for a new, additional bespoke site allocation policy</p>	<p>Defence Infrastructure Organisation.</p>
<p><b>A flexible mixed-use approach should be advocated within the plan:</b> The representor agrees employment-led development is the most suitable use for the site but contend that supporting uses i.e. residential, education healthcare, should also be referenced in a site-specific allocation as part of a flexible mixed-used approach which will facilitate sustainable development . The Representor provides wording for a new, additional bespoke site allocation policy</p>	<p>Defence Infrastructure Organisation.</p>
<p><b>The Policy does not allow for a sustainable new development to be created at Colerne Airfield and Azimghur:</b> In relation to Criterion i)-v) with regards to Colerne Airfield and Azimghur, these criterion do not allow sufficient scope for a sustainable new settlement to be created at the site. Specifically, Criterion i) is not appropriate at the site will remain separate from the existing parish of Colerne via the green wedge created by the county Wildlife Site at RAF Colerne; Criterion ii) is not achievable as the redevelopment of the site will reduce the need for regular off-site trips &amp; improvements to movement corridors &amp; enhanced public transport; Criterion iii) is strongly contested – to restrict development to land which is previously developed, will result in an inefficient layout and not the best use of land; Criterion iv) the existing buildings are not suitable for conversion and would not be financially viable. It would also be an unsustainable approach as it would not allow for new market and affordable housing and infrastructure; and v) Criterion v) the scale of development should be appropriate to the scale of the related to settlement, which indicates it would not support a new sustainable settlement at Azimghur and Colerne. This would restrict development options at the site rather than adopting the required proactive plan-led approach. A new bespoke site allocation policy is suggested by the representor.</p>	<p>Defence Infrastructure Organisation.</p>

Table 5.84 [Policy 67 - Sequential test and retail impact assessment] key issues

Key issues raised (Policy 67 - Sequential test and retail impact assessment)	Respondent(s)
<b>Alignment with National Policy</b>	
<b>Duplication of National Policy:</b> The policy is unnecessary duplication of National Policy.	Brimble Lea, Railway Pension Nominees.
<b>Threshold for undertaking a retail impact assessment too low:</b> The threshold of 200sqm for a Retail Impact Assessment is not appropriate as a range of permitted development rights allow change of use up to 500sqm to Class E. The threshold should be changed to 500 sqm. The current 200sqm threshold does not fully incorporate the requirements of paragraph 90 of the NPPF.	Brimble Lea, Railway Pension Nominees.
<b>Support for the policy:</b> Out of town retail would damage Salisbury City Centre and other town centres.	Individuals x10.
<b>Place specific comments</b>	
<b>Land at Woodshaw, Royal Wootton Bassett:</b> Promoter of land at Woodshaw, Royal Wootton Bassett does not support a convenience store within the site. They support this policy and that retail offer in the town centre should not be diluted.	David Wilson Homes.
Comments were made on the alignment of the draft Melksham Neighbourhood Plan with Policy 67.	Melksham Town Council.

**Table 5.85 [Policy 68 - Managing town centres] key issues**

Key issues raised (Policy 68 - Managing town centres)	Respondent(s)
<b>Settlement Hierarchy</b>	
<b>Local Centres:</b> The hierarchy should be expanded to include local centres. Supportive of the policy, primary shopping area and town centre boundary but the Plan omits a policy on 'local centres' such as Archers Gate Local Centre in Amesbury. There is no justification for not including Archers Gate as a local centre. A boundary should be included for Archers Gate on the policies map and a policy is needed to manage its development.	Amesbury Town Council.
<b>Wilton:</b> Wilton should also be designated as a Market Town.	Wilton Town Council.
<b>Settlement classifications (principal, heritage, transition and small towns)</b>	
<b>Melksham as a transition town:</b> Melksham is denoted as a 'Transition Town' but there is no description of what that classification practically means or what evidence is behind it [Melksham Without Parish Council]. Criteria for transition towns are not defined or effective and the policy is not sound.	Melksham Town Council.
<b>Wilton:</b> Settlement size seems to be determining the classification set out in Table 5.1. Wilton should be classified as a Heritage Town but is not due to its size	Wilton Town Council.
<b>Town centre boundaries and primary shopping areas</b>	
<b>Residential use in primary shopping areas:</b> Policy 68 does not offer guidance on the inclusion of residential development in primary shopping areas. The policy wording should be amended to acknowledge the importance of active frontages but also recognise that the inclusion of residential uses is important for footfall. The Respondent suggests policy wording changes.	Acorn Properties.
<b>Amesbury town centre boundary:</b> The amendments to Amesbury town centre boundary are supported but it is unclear why these changes have been made. Supporting text should be added to justify the changes. The Respondent provides examples of other buildings that should be within the town centre boundary.	Amesbury Town Council.
<b>Amesbury primary shopping area:</b> It is unclear why changes have been made to the Amesbury Primary Shopping Area. Supporting text should be added to justify the changes. The Respondent suggests changes to the Primary Shopping Area.	Amesbury Town Council.

Key issues raised (Policy 68 - Managing town centres)	Respondent(s)
<p><b>Chippenham town centre boundary and primary shopping area:</b> The Chippenham town centre boundary and primary shopping area should be consolidated. The Respondent suggests changes to the boundary to remove the area currently occupied by Tesco. This provides scope for a range of uses including residential which would allow greater flexibility and make a scheme at Emery Gate viable. The town centre boundary should be focused on the high street.</p>	Acorn Properties.
<p><b>Warminster town centre boundary:</b> The 'Asda on the Move' store should not be excluded from the town centre boundary of Warminster. The Respondent suggests changes to the policies map.</p>	Asda Stores Ltd.
<p><b>Calne town centre boundary and primary shopping area:</b> The town centre boundary and primary shopping area include Phelps Parade and are supported.</p>	Calne Community Neighbourhood Plan Steering Group.
<p><b>Cricklade town centre:</b> The Primary Shopping Area and Town Centre area for Cricklade is broadly supported, albeit there is a discrepancy with the Cricklade Neighbourhood Plan which also includes properties between Church Lane and Bath Road within the primary Shopping Area.</p>	Cricklade Town Council.
<p><b>Out of town retail sites:</b> Out of town retail sites should not be supported and Wiltshire Council should be lobbying MPs to change national policy on out of town units.</p>	Individuals x10.
<p><b>Flexibility of the policy</b></p>	
<p><b>Sui generis use:</b> Support for the policy approach including the extent of primary shopping area and town centre boundary for Salisbury, which includes Old George Mall. The policy enables flexibility which will enable vacant units to be reoccupied for appropriate uses. However there may be some instances where sui generis uses that fall outside the policy would be appropriate uses. This includes those uses combined with Class E uses. The policy should be more flexible to enable other appropriate uses.</p>	Railway Pension Nominees Ltd.
<p><b>Evidence base</b></p>	
<p><b>Updated evidence required:</b> An updated retail and town centres assessment is required to fully inform the LPR and overall growth requirements. The Retail and Town Centre Study (2020) commenced at the start of 2020 during the onset of the covid pandemic and there has since been significant change to town centre uses. The study only covers up until 2036. An updated study should be used to inform the overall strategy for development. The Respondent suggests that as Malmesbury has a healthy town centre the level of growth should be higher.</p>	Miller Homes.
<p><b>Town centre strategies</b></p>	

Key issues raised (Policy 68 - Managing town centres)	Respondent(s)
<b>Town centre strategy criteria:</b> Criteria for town centre strategies are not defined or effective and the policy is not sound. The role of neighbourhood plans to produce town centre strategies should be strengthened.	Melksham Town Council.
<b>Neighbourhood plans:</b> Neighbourhood plans bringing forward town centre strategies is supported.	Calne Community Neighbourhood Plan Steering Group.
<b>Role of town councils:</b> More shops and facilities are needed within towns. The Town Council should influence what goes in town shops.	Individuals x10.



Table 5.86 [Policy 69 - Tourism and related development] key issues

Key issues raised (Policy 69 - Tourism and related development)	Respondent(s)
<b>Policy support</b>	
Conditional support for all/ part of Policy 69 expressed by a number of representors.	Hilperton Parish Council with Hilperton Area Action Group; Natural England.
<b>General</b>	
<b>Development outside of a settlement:</b> The policy doesn't recognise that some tourist/ visitor generating development isn't located near, or dependent on, a nearby settlement e.g. spas, hotels and diversified farms but these facilities do have an important role to play to Wiltshire's tourism. The Representor suggests additional policy wording to reflect this.	LD&PC Ltd.
<b>The impact of proposed housing allocations on tourism:</b> Concern is expressed that the policy is at odds with Policy 53 (Land North-East of Hilperton, Trowbridge), as tourism may be reduced as a result of the proposed housing developments.	Hilperton Parish Council with Hilperton Area Action Group.
<b>Tourism value of the National Landscapes:</b> The policy and related section does not acknowledge that National Landscapes and dark skies contribute significantly to Wiltshire's tourism.	Cranborne Chase Area of Outstanding Natural Beauty.
<b>National Landscapes:</b> Concern that the policy wording could facilitate the establishment of inappropriate types of tourist development in the National Landscape. The policy wording needs to be tightened with clearer guidance on the scale and extent of permissible tourism development.	Cranborne Chase Area of Outstanding Natural Beauty.
<b>Supporting documents should be reflected within the policy:</b> The policy should be strengthened by reflecting the priorities and measures of the 'Wiltshire Tourism Recovery Plan' 2021 & 'The Destination Management & Development Plan' 2015.	Manorwood Leisure Developments.
<b>Benefits of tourism:</b> The policy should recognise and support opportunities to diversify and strengthen the tourism offer, as well as widening the market to improve enjoyment of the area, stimulate the local economy and recognise that leisure and tourism contributions can facilitate and increases dwell time and visitation spend (such as accommodation and eateries).	Manorwood Leisure Developments.
<b>Re-use of obsolete rural buildings for tourism-related uses:</b> Many rural buildings are not being used efficiently or are in a state of disrepair. These could contribute towards the provision of accommodation in a rural setting. This was previously covered by Core Policy 40 (Hotels, bed & breakfasts, guest houses and conference facilities). The Representor suggests additional policy wording to reflect this.	DPDS Consulting on behalf of an Individual.

Key issues raised (Policy 69 - Tourism and related development)	Respondent(s)
<b>Site specific</b>	
<p><b>Tourism-related benefits of canals:</b> Restoring the Wilts &amp; Berks Canal will bring significant economic benefits, arising from tourism and leisure activities, dispersed along the canal corridor., which is not reflected within the Policy or supporting text. The Representor suggests additional policy wording to reflect this. Also, add the 'Kennet &amp; Avon Canal' as a major tourist destination at paragraph 5.29.</p>	<p>Wiltshire and Berks Canal Trust; Wiltshire, Swindon &amp; Oxfordshire Canal Partnership.</p>
<p><b>Consideration of the Longleat Estate:</b> The policy doesn't reflect the unique nature and location of Longleat, as it applies a settlement hierarchy approach, with Longleat not falling within any of the defined settlement categories. Future proposals may extend beyond existing or replacement buildings, and as such the policy fails to recognise the guidance at Para 85 of NPPF, which may have implications for the retainment and increase of visitor numbers, therefore being contrary to NPPF Para 84. The policy should recognise the need for growth at established tourist destinations and provide a supportive framework. The Representor has suggested changes to overcome their comments.</p>	<p>Longleat Enterprise Ltd.</p>
<p><b>Failure of the policy to recognise Swindon as a Principal Settlement:</b> This weakens the potential effectiveness of the policy to that part of Swindon that lies within Wiltshire. The LPR has failed to recognise the fundamentally important role Swindon plays in the north-eastern part of Wiltshire and beyond, especially in economic terms and has failed to provide a comprehensive spatial and economic framework for the Greater Swindon area.</p>	<p>Swindon Chamber of Commerce.</p>
<p><b>Consideration of Ashton Keynes/ Cotswold Water Park:</b> The policy fails to mention the Cotswold Water Park (CWP) and the tourism diversity it brings. The previous policy (Core Policy 54 – Cotswold Water Park) recognised the potential for leisure and recreation development proposals that have and will come forward in this location. The only reference to the CWP is now in Policy 88 (Biodiversity &amp; geodiversity), which doesn't prohibit development but requires a higher test to conserve, and, where possible, enhance biodiversity value. The Representor has suggested changes to overcome their comment.</p>	<p>Manorwood Leisure Developments.</p>

**Table 5.87 [Policy 70 - Sustainable Transport] key issues**

Key issues raised (Policy 70 - Sustainable Transport)	Respondent (s)
<b>Transport Strategies</b>	
<b>Duplication of national policy:</b> Policy 70 is an unnecessary duplication of national policy in respect of sustainable transport, and should be deleted.	Brimble Lea
<b>Viability:</b> Difficult to cost transport strategies when they have not been fully developed. LPR viability work includes no allowance for costs associated with this policy.	Bloor Homes South West
<b>Lacking Detail/TEB:</b> At local level, transport strategies are insufficiently defined and evidenced covering their deliverability and impact of specific measures and upon allocations. Fails to mandate steps required by TEB to achieve climate change targets, with suggestions made scenarios 3 and 4 should be carried forward. Concern raised over lack of LTP4 to support plan. Suggested that plan has been prepared ahead of preparation of TEB (with the TEB itself being accused of being flawed and not complying with DfT modelling guidance), inconsistent with NPPF para 104. Concern is also raised about the use of county-wide figures are their accuracy when applied at local level. Furthermore, quantity of trips anticipated as being made without private car/by sustainable means is unrealistic. How is a 'proportionate' strategy defined – should be consulted on.	Go South Coast Ltd; CPRE South-West Group; Ludgershall Homes; Wiltshire Climate Alliance; CPRE Wiltshire; Chippenham Town Council; CPRE South Wiltshire Group; Rushall Parish Council; Cycling Opportunities Group, Salisbury; Individual x110.
<b>Rural Areas:</b> Wider transport strategy/transport transition plans for smaller settlements and rural areas required to demonstrate sustainable transport modes and connections with reference to funding these connections. Suggested to support cycle connections from villages to centres. Policy appears to show an acceptance to people in rural areas having poor sustainable transport access – sweeping statement inconsistent with NPPF to provide transport choice. Conversely, some suggested policy should take flexible approach to transport in rural areas. Development in areas without sustainable transport is unsound and it is recommended that funding be directed towards delivering bus or community transport services in rural areas.	Go South Coast Ltd; Bratton Parish Council; Colerne Parish Council; Cycle Chippenham; Salisbury NHS Foundation; Colerne Parish Council; CPRE South Wiltshire Group; Wiltshire Climate Alliance; Miller Homes; Society of Merchant Ventures; Cycling Opportunities Group, Salisbury; Lydiard Tregoze Parish Council; CPRE Wiltshire; Individuals x10.
<b>Comprehensive Strategy:</b> Strategy required for cycling, walking and public transport to analyse current and future demands and set out how networks will be delivered moving forward. The existing Bus Service Improvement Plan (2022) should inform the plan. There should be more emphasis on cycling infrastructure, currently inconsistent with NPPF para 106.	Wiltshire Climate Alliance; Go South Coast Ltd; Chippenham Town Council; Melksham Town Council; Individuals x10.
<b>Car Centric:</b> Suggested that current plans for road building (dualling A350, Melksham bypass) will increase local vehicle movement – suggested any new roads should prioritise cycling. Concern that policy wording is car centric, contravenes NPPF Paras 110 and 112. Should reinstate statement from CP60 of WCS to seek to reduce travel by private car.	Chippenham Town Council; Cycle Chippenham; Cycling Opportunities Group, Salisbury; Individuals x10.

Key issues raised (Policy 70 - Sustainable Transport)	Respondent (s)
<b>Railway network:</b> The policy does not refer to travel by railway - would like to see opportunities for sustainable rail transport increased within the National Landscape area with policy encouragement for the opening / reopening of stations in the area.	Cranborne Chase Area of Outstanding Natural Beauty.
<b>Inclusive design:</b> The Local Plan should embed inclusive design principles into streetscape planning, e.g. safe and suitable routes for mobility scooters, avoiding shared routes - and more parking spaces suitable for older/disabled people.	Individuals x10.
<b>Outcomes/Monitoring:</b> There should be a method to measure the outcomes of this policy (i.e. sustainable transport adoption rates) and monitor the delivery of infrastructure.	Cycling Opportunities Group, Salisbury; Chippenham Town Council; CPRE South Wiltshire Group; Individuals x10.
<b>Canal Paths:</b> Canal paths not recognised as a way to deliver active travel options. Suggest funding via developer contributions.	Wilts and Berks Canal Trust.
<b>Freight:</b> Freight management strategy (FMS) should be prepared. Bullet point 5 cannot be delivered without an FMS. Additionally, parking for HGVs resulting from increased logistics development has not been considered.	Rushall Parish Council; Moto Hospitality Ltd; Individuals x10.
<b>Relationship to Development:</b> Suggested that transport opportunities identified have not influenced the location of developments.	Go South Coast Ltd.
<b>Salisbury</b>	
<b>Unsustainable Growth:</b> Sustainable travel unrealistic when large scale employment is not available in Salisbury leading to out commuting and resulting traffic. Harnham Gyratory does not have sufficient capacity for growth.	Individuals x40.
<b>Sites 8 &amp; 9:</b> Concern about sustainable travel (cycling) uptake given challenging topography of locality for reaching services. Noted inconsistency with the Local Plan, TEB and Revised Spatial Strategy 2023 regarding whether the traffic modelling has suitably factored in the impact of sites 8 and 9. Concern that the 'Transport Refresh' (related to upgrades at Harnham Gyratory and the Exeter Street roundabout) do not take into account the impact from sites 8 and 9 and will be ineffective.	Individuals x80.
<b>Policy Wording</b>	
<b>Carbon Emissions:</b> Policy only addresses carbon emissions. No reference to decarbonising transport/EV infrastructure. Policy is insufficient to meet carbon emissions reduction targets.	Cycle Chippenham; Go South Coast Ltd; CPRE South Wiltshire Group; Cycling Opportunities Group, Salisbury; Wiltshire Climate Alliance; CPRE South West Group; Warminster Town Council; Individuals x10.

Key issues raised (Policy 70 - Sustainable Transport)	Respondent (s)
<b>Climate Emergency:</b> Policy should evidence intent to tackle climate emergency.	Individuals x10
<b>Duty to Cooperate/Long Distance:</b> No effort made with neighbouring LPAs to coordinate longer distance sustainable transport. No long-distance sustainable transport wording.	Wilts and Berks Canal Trust ; Individual x1; Wilts and Berks Canal Trust; Go South Coast Ltd.
<b>Food Miles:</b> Suggested wording to include support for reduction of food miles.	Individuals x10.
<b>Air Quality:</b> No mention of air quality.	Melksham Town Council
<b>Sustainable Options:</b> Policy should be reworded to focus on delivery of enhancements to sustainable travel options.	Trowbridge Town Council; Cycle Chippenham; Individual x1
<b>Integration:</b> Fails to refer to importance of public transport integration at early stages of planning.	CPRE Wiltshire

Table 5.88 [Policy 71 - Transport and new development] key issues

Key issues raised (Policy 71 - Transport and new development)	Respondent(s)
<b>General</b>	
<b>Support:</b> The policy is generally supported/sound.	Melksham Town Council; Calne Without Parish Council; Castlewood Property Ventures; Bloor Homes; Wyatt Homes; Paul Bowerman Discretionary Trust; Leda Properties; L&Q Estates; Hill Residential Ltd; David Wilson Homes; Mac Mic Group; Sustainable Calne.
<b>Duplication of policy:</b> Policy 71 is unnecessary duplication of national policy, and should be deleted.	Brimble Lea.
<b>Flexibility of policy:</b> It should be clarified that criteria a-j will not be relevant to every development – policy wording should be flexible such that criteria a-j are not prescriptive, to enable each scheme to provide for an appropriate level of assessment.	Bloor Homes; Persimmon Homes.
<b>Meeting the needs of all transport users:</b> Paragraph 5.37 states “...must be demonstrated that the needs of all transport users (where relevant) have been considered.”. The NPPF does not provide latitude to decide whether it is “relevant” to consider the needs of “all transport users”, and this is unsound.	Go South Coast.
<b>Clarity of policy:</b> The first paragraph is unclear and would benefit from clarification. [Policy wording amendment proposed by the representor]	Trowbridge Town Council.
<b>Local Transport Plan / Transport Plans</b>	
<b>Accessibility:</b> The policy/supporting text should refer to the Wiltshire Local Transport Plan and its specific strategies related to accessibility, cycling and powered two-wheelers.	Bloor Homes; Persimmon Homes.
<b>Update to the Local Transport Plan needed:</b> The Local Transport Plan should be updated to reflect changes in national policy, national guidance and the Local Plan.	Bloor Homes; Persimmon Homes; Chippenham Town Council.
<b>Transport strategies:</b> Transport strategies for the Principal Settlements and Market Towns have yet to be finalised and are therefore not fully costed. There may be viability implications for developers. Implications of this policy have not been factored into the LPR’s viability assessment.	Bloor Homes.
<b>Electric vehicle infrastructure</b>	
<b>Support:</b> Support the requirement for the provision of electric vehicle infrastructure.	Salisbury Foundation Trust and Salutem Developments; Individuals x10.

Key issues raised (Policy 71 - Transport and new development)	Respondent(s)
<b>Clarification concerning standards for new car parking:</b> The policy should clarify that requirements for charging provision are to be in line with national standards for new – and not for replacement – car parking.	Salisbury Foundation Trust and Salutem Developments.
<b>Clarification concerning standards:</b> Reference to electric vehicle infrastructure being required ‘in accordance with national or local standards as relevant’ creates uncertainty and contradicts reference to the requirement to accord with Buildings Regs in para 5.41. The applicable standards should be clarified.	Bloor Homes; Persimmon Homes.
<b>Local electric vehicle infrastructure strategy:</b> It is not clear whether the council have prepared a local electric vehicle infrastructure strategy as of yet, and what it may propose by way of a coordinated roll out of charging infrastructure to support the transition to zero emissions transport. The policy should link to the local electric vehicle infrastructure strategy and ensure that new developments contribute to its delivery.	Wiltshire Climate Alliance.
<b>CIL/Planning obligations</b>	
<b>Use of planning obligations:</b> The policy is unjustified as it is contrary to the NPPF and CIL Regulations with regard to restrictions on use of planning obligations. [Policy wording amendment proposed by the representor]	Gleeson Land.
<b>Requirement for developer contributions:</b> It is not sufficient to that developer contributions will be sought towards sustainable transport improvement “where appropriate”.	CPRE.
<b>Mitigation measures:</b> In respect of sustainable transport improvements, the policy only refers to developer contributions, but not mitigation measures. [Policy wording amendment proposed by the representor]	Cycle Chippenham.
<b>Modal shift / sustainable transport</b>	
<b>Appropriate sustainable transport improvements:</b> The NPPF encourages ‘appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location.’, it is recommended the policy be amended to refer to ‘appropriate’ sustainable transport improvements.	Miller Homes; Society of Merchant Venturers.
<b>Safe and inclusive active travel infrastructure:</b> Concern that the policy is not firm enough to ensure that new developments provide sustainable transport infrastructure. The policy should include requirement for safe and inclusive active travel infrastructure, which is key to achieving modal shift. [Policy wording amendment proposed by the representor]	Chippenham Town Council.
<b>Car dependency:</b> The policy does not adequately set requirements to support modal shift to public and active transport. It supports continued car dependency.	Individuals x10.
<b>Strategy for cycling walking and public transport:</b> A comprehensive strategy for cycling, walking and public transport is needed to fully analyse current, future and potential demands, and to set out how continuous networks will be delivered.	Individuals x10.

Key issues raised (Policy 71 - Transport and new development)	Respondent(s)
<p><b>Alternative strategies in the transport evidence base:</b> Monitoring proposed should take forward the metrics which are given for 'avoid', 'shift' and 'improve' for scenarios 3 and 4 in the Transport Evidence Base. To include reduction in travel demand and measures of the shift to shorter journeys by more sustainable modes. There need to be measures in the Monitoring Framework to measure the effectiveness of this policy.</p>	<p>Wiltshire Climate Alliance; Cycling Opportunities Group Salisbury (COGS); CPRE.</p>
<p><b>Policy levers to shift away from the private car:</b> There is a lack of evidence that the policy levers outlined in the Transport Evidence Base 2022, promoting a shift away from private cars to other modes like walking, cycling, and buses, can be effectively implemented.</p>	<p>Individuals x10.</p>
<p><b>Lack of prioritisation for pedestrians and cyclists:</b> The policy, as a non-prioritised list, is not consistent with national policy (NPPF para 112) which gives priority first to pedestrian and cycles, followed by less sustainable transport options. Sustainable transport options should be promoted over less sustainable ones.</p>	<p>Natural England; Salisbury City Council; Chippenham Town Council; Wiltshire Climate Alliance; Cycling Opportunities Group Salisbury (COGS); Cycle Chippenham; Save Chippenham; CPRE; Individuals x10.</p>
<p><b>Policy wording within Wiltshire Core Strategy Core Policy 66:</b> Policy wording within WCS Core Policy 61 regarding reducing the need to travel should be reinstated; Updates to the current WCS Core Policy 61 requirements with preferential hierarchy of travel modes should be added. [Policy wording amendment proposed by the representors]</p>	<p>CPRE; Cycling Opportunities Group Salisbury (COGS); Cycle Chippenham.</p>
<p><b>Micro-mobility vehicles:</b> On the basis that 'micro-mobility vehicles' (e.g. e-bikes and e-scooters) can travel at speeds of up to 15.5mph, these should be listed alongside 'people cycling/scooting' in the hierarchy; The policy should list electric bikes within the list of transport modes.</p>	<p>Cycle Chippenham; CPRE.</p>
<p><b>Adherence to LTN 1/20:</b> The policy should explicitly state that cycle infrastructure is to be designed in accordance with LTN 1/20.</p>	<p>Chippenham Town Council.</p>
<p><b>Cycle safety:</b> The policy should prioritise enabling children to travel safely by bike to school and adults to places of work without feeling intimidated by traffic.</p>	<p>CPRE.</p>
<p><b>Public transport promotion:</b> The Local Plan has not fully explored opportunities to promote public transport use; transport infrastructure and services cannot support existing housing numbers nor proposed additional housing.</p>	<p>Individuals x10.</p>
<p><b>Climate change</b></p>	
<p><b>Climate change obligations:</b> The policy is unsound as it fails to take steps in the Transport Evidence Base that are necessary to meet climate change obligations set out by Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 (as amended).</p>	<p>Wiltshire Climate Alliance; Cycling Opportunities Group Salisbury (COGS); CPRE.</p>



Key issues raised (Policy 71 - Transport and new development)	Respondent(s)
<b>Discrepancy with Policy 4:</b> The policy is unsound/not justified as it does not carry forward bullets in Policy 4 Addressing Climate Change e.g. minimise carbon emissions by developing in locations which reduce the need to travel.	Wiltshire Climate Alliance; Cycling Opportunities Group Salisbury (COGS); CPRE.
<b>Alternative scenarios in the Transport Evidence Base:</b> The Transport Evidence Base makes clear that the only transport scenarios to contribute to Net Zero goal would be Scenarios 3 and 4. Interventions need to be incorporated into the policy - mixed use developments to meet a greater range of local needs, 15-minute neighbourhoods, house design to allow for workspace, mobility hubs, car and bike share, location/design to reduce the need to travel by private car, encouragement of sustainable transport alternatives.	Wiltshire Climate Alliance; Cycling Opportunities Group Salisbury (COGS).
<b>Green infrastructure</b>	
<b>Linear green infrastructure:</b> There should be a reference to linear green infrastructure in the policy. The first sentence in the penultimate paragraph should be amended. [Policy wording amendment proposed by the representors]	Salisbury Area Greenspace Partnership.
<b>Wiltshire's canals:</b> Canals provide popular access to towpaths for leisure opportunities and active travel/sustainable transport. Canal paths should be integral to active travel schemes and considered for construction or upgrading through developer obligations.	Wilts and Berks Canal Trust.
<b>Application of Policy 71 at Calne</b>	
<b>Allocation of land at Calne:</b> Concern that land allocated at Calne will not be able to conform with the requirements of Policy 71/will be considered under the existing WCS policies.	Sustainable Calne.
<b>Application of Policy 71 at Chippenham</b>	
<b>Allocation of land at Chippenham:</b> Concern that land allocated at Chippenham will not be able to conform with the requirements of Policy 71.	Save Chippenham.
<b>Lack of engagement with highways authorities:</b> Concern that the policy does not align with NPPF para 106(b) which requires that policies be prepared with active involvement of highways authorities, other transport infrastructure providers, operators and neighbouring councils, to align strategies and investments for sustainable transport.	Save Chippenham; Chippenham Town Council.
<b>Application of Policy 71 at Salisbury</b>	
<b>Walking/cycling/public transport accessibility to proposed allocations at Harnham:</b> Assumptions made about residents using public transport/walking/cycling are unrealistic. Poor/distant pedestrian/public transport access to services/ facilities/ employment. Most people will rely on private cars.	Individual x130.

Key issues raised (Policy 71 - Transport and new development)	Respondent(s)
<b>Impacts on local roads:</b> Developments south of Salisbury will unduly increase traffic/congestion in the area e.g. Coombe Road / Harnham Gyratory (functioning 97% capacity) / Southampton Road / College Roundabout / Exeter Street Roundabout / Old Blandford Road / New Bridge Road / other roads in and around Salisbury.	Individual x170.
<b>Funding to deliver highways improvements:</b> There is insufficient commitment of funding to achieve the highways improvements that are needed to address congestion impacts around Salisbury, as a result of both planned and emerging development sites.	Individual x80.
<b>Impacts on emergency services:</b> Impacts on emergency service response times as a result of congestion have not been properly considered.	Individual x90.
<b>Access to the road network:</b> The proposed point of access to the two Harnham sites is unsafe as it is on a blind bend.	Individual x60.
<b>Accessibility to schools:</b> Proposed sites at Harnham lack accessibility on foot/cycle to schools.	Individual x80.
<b>Salisbury Transport Refresh:</b> Concern that the Salisbury Transport Refresh does not factor in Local Plan allocations in Salisbury.	Individual x80.
<b>Traffic modelling at Salisbury:</b> There is conflicting information within the Local Plan Transport Evidence Base and Revised Spatial Strategy 2023 regarding whether the traffic modelling has so far incorporated the specific impact of Sites 8 and 9.	Individual x20.
<b>Access to Site 8:</b> The Sustainability Appraisal (Site 8, Objective 11) states that access "may not be achievable" but this overlooked in the Local Plan.	Individuals x10.
<b>Lack of Salisbury-specific evidence:</b> The Transport Evidence Base 2022's modelling data fails to adhere to Department for Transport modelling guidance/uses incorrect data/uses county wide projections not Salisbury specific data.	Individual x10.
<b>Freedom of Information requests:</b> Concern that FOI requests for design and costings for improvements to Harnham Gyratory have been denied.	Individual x10.
<b>Parking availability at Salisbury station:</b> The capacity for parking at Salisbury station is needed to support further residential growth.	Individual x10.
<b>Capacity on the A36:</b> Concern that the A36 Alderbury by-pass is operating beyond its capacity – concern about continuing adverse impact of housing development in Alderbury on this over-loaded road, particularly in a northerly direction.	Alderbury Parish Council.

Key issues raised (Policy 71 - Transport and new development)	Respondent(s)
<b>Application of Policy 71 in the rural areas</b>	
<b>Transport options for lower income households:</b> Planning transport infrastructure for housing in rural areas should consider, as well as the environment, social exclusion – considering transport options for low incomes households without private cars.	Individuals x10.
<b>Sustainable transport in the rural areas:</b> The policy is not sound/positively prepared in respect of sustainable transport for rural areas – sustainable transport opportunities must be maximised/may not necessarily be limited in these areas if improved services and infrastructure are promoted. The policy should be more positive and seek opportunities for rural developments to incorporate sustainable transport options as priorities.	Wiltshire Climate Alliance; Keevil Parish Council; Go South Coast.
<b>Linkages to Policy 1 and Policy 2:</b> The policy would be make more effective by linking to the strategy set by Policy 1 and 2 and the settlement hierarchy to clarify expectations across the settlements. [Policy wording amendment proposed by the representor]	Go South Coast.
<b>Traffic impacts between settlements:</b> Consideration must be given to potential impacts of new development on traffic congestion within and between the towns and villages particularly to the west of the county.	Keevil Parish Council.
<b>Digital connectivity:</b> The policy should make reference to requiring good digital connectivity, which is essential to reduce the need to travel.	CPRE.
<b>Low emission zone in Bath:</b> Concern that traffic diverted from LEZ's in Bath are having impacts on Wiltshire's towns and countryside.	Individuals x10.

Table 5.89 [Policy 72 - Development impacts on the primary and major road networks] key issues

Key issues raised (Policy 72 - Development impacts on the primary and major road networks)	Respondent(s)
<b>Access from major road networks</b>	
<b>Applicability to the Strategic Road Network:</b> It is unclear if the policy is also referring to the Strategic Road Network, and this should be clarified with additional wording in respect of the Strategic Road Network to state that any proposals for new accesses will also have to comply with the requirements of DfT Circular 01/2022 and standards set out within the Design Manual for Roads and Bridges.	National Highways.
<b>Improvements to the Strategic Transport Network:</b> The Local Plan and its evidence base must identify needs for improvements across the Strategic Road Network (including the A303 and the A36) resulting from planned housing and employment growth. This should be identified in the updated Infrastructure Delivery Plan, with a defined funding and delivery strategy.	National Highways.
<b>Lack of evidence:</b> The policy is overly prescriptive and not evidenced. It does not consider circumstances where access from the major road network may be the only viable, safest option/could sterilise opportunities for sustainable development; Policy 72 should be deleted/reworded and each application should be considered on its own merits through Transport Assessments where required; Policy 72 should be replaced with a preference to not provide access from the Major Road Network included in supporting text associated with Policy 71.	Baker Estates Ltd; Robert Hitchens Ltd; White Horse Country Club Ltd; Martin Grant Homes; Hannick Homes; Cooper Estates; Quidhampton Developments Ltd; Bloor Homes; Woodhouse Developments (Amesbury); Miller Homes; Wyatt Homes.
<b>Engagement with partnership bodies:</b> The policy should make more prominent the need for partnership working with key bodies like National Highways. Reference to the role which the Council can play in delivery negotiations and strategies should be included in the policy.	David Wilson Homes.
<b>Applicability to allocated sites:</b> Policy 72 should be amended so that the requirements do not apply to allocations set out in the Local Plan which require access from a major road network (e.g. Policy 27).	Wyatt Homes.
<b>Impacts on local road infrastructure:</b> The policy should require new developments to include impact assessments on local road infrastructure to identify any mitigation that may be required.	Individuals x10.
<b>Application of Policy 72 at Salisbury</b>	
<b>Walking/cycling/public transport accessibility to proposed allocations at Harnham:</b> Assumptions made about residents using public transport/walking/cycling are unrealistic. Poor/distant pedestrian access. Most people will rely on private cars.	Individuals x100.

Key issues raised (Policy 72 - Development impacts on the primary and major road networks)	Respondent(s)
<b>Impacts on local roads:</b> Developments south of Salisbury will unduly increase traffic/congestion in the area e.g. Coombe Road / Harnham Gyratory / Southampton Road / College Roundabout / Exeter Street Roundabout / Old Blandford Road / New Bridge Road.	Individuals x150.
<b>Funding to deliver highways improvements:</b> There is insufficient commitment of funding to achieve the highways improvements that are needed to address congestion impacts around Salisbury, as a result of both planned and emerging development sites.	Individuals x80.
<b>Salisbury Transport Refresh:</b> Concern that the Salisbury Transport Refresh does not factor in Local Plan allocations in Salisbury.	Individuals x70.
<b>Impacts on emergency services:</b> Impacts on emergency service response times as a result of congestion have not been properly considered.	Individuals x80.
<b>Access to the road network:</b> The proposed point of access to the two Harnham sites is unsafe as it is on a blind bend.	Individuals x70.
<b>Accessibility to schools:</b> Proposed sites at Harnham lack accessibility on foot/cycle to schools	Individuals x70.
<b>Lack of Salisbury-specific evidence:</b> The Transport Evidence Base 2022's modelling data fails to adhere to Department for Transport modelling guidance/uses incorrect data/uses county wide projections not Salisbury specific data.	Individuals x20.
<b>Freedom of Information requests:</b> Concern that FOI requests for design and costings for improvements to Harnham Gyratory have been denied.	Individuals x10.
<b>Access to Site 8:</b> The Sustainability Appraisal (Site 8, Objective 11) states that access "may not be achievable" but this overlooked in the Local Plan.	Individuals x10.
<b>Incompatibility of Harnham sites against this policy:</b> The two Harnham sites would be accessed directly from the national primary route network outside of built up area – in contravention with the requirements of Policy 72.	Individuals x10.
<b>Traffic modelling at Salisbury:</b> There is conflicting information within the Local Plan Transport Evidence Base and Revised Spatial Strategy 2023 regarding whether the traffic modelling has so far incorporated the specific impact of Sites 8 and 9.	Individuals x10.
<b>Application of Policy 72 at Trowbridge</b>	

Key issues raised (Policy 72 - Development impacts on the primary and major road networks)	Respondent(s)
<p><b>Incompatibility of Trowbridge site against this policy:</b> It is noted that the Yarnbrook West Ashton Relief Road conflicts with Policy 72, by making a strategic roundabout on the A350. The development should be separated from the A350.</p>	<p>Individuals x10.</p>

Table 5.90 [Policy 73 - Transport: Demand Management] Key Issues

Key issues raised (Policy 73 - Transport: Demand Management)	Respondent(s)
<b>Support Policy 73</b>	
<b>Sustainable Transport Options:</b> The policy is welcomed as it means the inclusion of promoting and supporting sustainable transport options.	Natural England.
<b>Support for the policy:</b> Conditional support for all/ part of Policy 73 was expressed by a number of representors.	Individuals x10.
<b>Objection to Policy 73</b>	
<b>Increased travel delays:</b> The plan risks not delivering on Policy 73 to manage demand and will result in more travel delay, not less.	Individuals x10.
<b>A requirement should be set for travel plans:</b> Policy 73 is not effective and should set a requirement for travel plans as it appears more a statement of priorities.	Melksham Town Council.
<b>Current strategy is inadequate:</b> No detail on what Wiltshire Council are thinking and their current 'strategy' is inadequate.	Individuals x10.
<b>Modifications</b>	
<b>Active travel:</b> Policy 73 on transport includes active travel and cycling infrastructure as the last sub - point in the policy which should be given a higher priority.	Corsham Town Council.
<b>Digital connectivity:</b> Policy 73 should include the need for good digital connectivity and accessibility mapping across all modes to better integrate policies, reduce climate emissions and provide remote opportunities for people to live more sustainable lives.	CPRE Wiltshire.
<b>Smarter choice measures:</b> Smarter choice measures need to distinguish between car sharing and lift sharing.	Cycling Opportunities Group Salisbury.
<b>Charging measures:</b> No reference is made to charging measures such as congestion charges which should be reinstated as it influences people's travel behaviour.	CPRE Wiltshire.
<b>Relevant standards must be set out in the development plan document itself:</b> Relevant standards must be set out in the development plan document itself rather than referring to external strategies/ plans.	Brimble Lea.

Key issues raised (Policy 73 - Transport: Demand Management)	Respondent(s)
<p><b>Documents outside of Development Plan:</b> Reference is made in the Policy to a number of documents that do not form part of the Development Plan. In doing so, the Policy gives Development Plan effect to these documents. Reference to these documents should therefore be removed from the Policy and only included within the Policy's supporting text.</p>	Bloor Homes.
<p><b>Principal Settlements</b></p>	
<p><b>Plan fails to recognise Swindon:</b> The failure to identify Swindon as a Principal Settlement and identify a locational development strategy based on the opportunities that this would afford means that all transport policies are effectively compromised to a degree because of the inability of the Local Plan to fully exploit sustainable travel options. For example, the recently re - twin - tracked Swindon to Cheltenham/ Gloucester rail line has substantial capacity that could be utilised by a West Swindon allocation to meet housing and employment needs.</p>	Thames Valley Chamber of Commerce.
<p><b>Car Parking</b></p>	
<p><b>Car Parking:</b> It is a policy of increasing car parking charges, reducing car parking spaces, and 'managing' car parking for residents with adequate parking on new build estates.</p>	Individuals x10.
<p><b>Park &amp; Ride:</b> Car parking measures need to include reference to Park &amp; Ride.</p>	Cycling Opportunities Group Salisbury.
<p><b>The intention of the policy:</b> The intention of the policy is to persuade people to use alternative transport modes and to reduce the availability of parking. Need to ensure it does not conflict with the need to encourage people to travel into town centres and support their continued vitality and viability.</p>	David Wilson Homes; Leda Properties Ltd; Paul Bowerman Discretionary Trust; Hill Residential Ltd.
<p><b>Local Transport Plan</b></p>	
<p><b>Plans not available:</b> No Local Transport Plans or LCWIP revised documents are made available to check against, making the policy unsound.</p>	CPRE Wiltshire; Individual; Wiltshire Climate Alliance; Cycling Opportunities Group Salisbury.
<p><b>Electric Vehicle Infrastructure</b></p>	
<p><b>Charging Points:</b> Electric vehicle charging points are supported but the policy doesn't identify the types of places where electric car charging points should be.</p>	Individuals x10.
<p><b>Climate Change</b></p>	



Key issues raised (Policy 73 - Transport: Demand Management)	Respondent(s)
<p><b>Transport Evidence Base:</b> The policy is unsound as it fails to take steps in the Transport Evidence Base that are necessary to meet climate change obligations set out by Section 19 (1A) of the Planning and Compulsory Purchase Act 2004. In order to minimise carbon emissions and contribute to a Net Zero goal, policies need to make reference to the interventions which are suggested in the Transport Evidence Base for Scenarios 3 and 4.</p>	<p>Cycling Opportunities Group Salisbury; Wiltshire Climate Alliance; CPRE South Wiltshire Group.</p>
<p><b>Modal Shift</b></p>	
<p><b>Lack of evidence:</b> There is a lack of evidence that the policy levers outlined in the Transport Evidence Base 2022, promoting a shift away from private cars to other modes like walking, cycling and buses can be effectively implemented.</p>	<p>Individuals x10.</p>
<p><b>Monitoring</b></p>	
<p><b>How will this be monitored:</b> Monitoring of the policy will require further work, to provide baseline values for transport modes and targets for traffic reduction and modal shift.</p>	<p>Wiltshire Climate Alliance; Cycling Opportunities Group Salisbury.</p>
<p><b>Transport Evidence Base</b></p>	
<p><b>A quarter of trips to be made without cars:</b> Suggestions that around a quarter of trips will be made without using the car seems completely unrealistic especially as there are no additional buses planned. People will need to use their cars for work, school etc.</p>	<p>Individuals x40.</p>
<p><b>10% of journeys using sustainable modes:</b> 10% of all journeys are expected to be made using sustainable transport.</p>	<p>Individuals x40.</p>
<p><b>1 - 2% of journeys will occur without a car:</b> It is unrealistic to think that more than 1 - 2% of journeys will occur without a car.</p>	<p>Individuals x10.</p>
<p><b>23% of trips without cars:</b> 23% of trips will be made without cars.</p>	<p>Individuals x10.</p>
<p><b>Salisbury Transport Refresh does not take into account additional traffic:</b> Development of some early plans (Transport Refresh) for improvements to the Harnham Gyratory and Exeter Street Roundabout, do not take into account the additional traffic from the new developments at site 8 &amp; 9.</p>	<p>Individuals x60.</p>
<p><b>The Transport Evidence base says the Gyratory will be at 97% capacity by 2036:</b> Traffic gridlock will worsen as a result of development at Sites 8 &amp; 9 and The Transport Evidence Base already says that the Gyratory will be at 97% capacity by 2036. Anything over 85% capacity means that the road infrastructure can no longer cope with the traffic.</p>	<p>Individuals x40.</p>

Key issues raised (Policy 73 - Transport: Demand Management)	Respondent(s)
<b>Policy 73 in Salisbury</b>	
<b>Harnham Gyratory:</b> According to FOI requests the design and costings for improvements to the Harnham Gyratory are being finalised and the Council cannot adequately assess the impact of development on the transport network nor guarantee that it can be delivered.	Individuals x10.
<b>Salisbury Railway Station parking:</b> No additional parking at Salisbury Rail Station and with the proposed housing allocation raises questions about addressing potential parking issues for commuters.	Individuals x10.
<b>Demand management needs to take an overall approach:</b> Policy 73 requires a detailed supported analysis of integrated traffic planned for Salisbury including Harnham. Demand management needs to take an overall approach.	Individuals x10.
<b>Improvements to the transport network are needed:</b> Poor integration, connectivity and severance of pedestrians and the cycle network for journeys to key destinations including the rail station contribute to the traffic congestion in Salisbury. Without safe cycle routes and a reliable bus service it is unrealistic to think people will use alternative forms of transport.	Individuals x10.
<b>A36 Improvements:</b> National Highways improvements for the A36, projected to cost £6m and anticipated for completion by 2028, lack committee funding, making the delivery of these improvements uncertain.	Individuals x10.
<b>Road congestion and poor infrastructure is the main constraint to Salisbury's growth:</b> The report in the Public Issues Consultation 2017 highlights road congestion and poor infrastructure as a main constraint to Salisbury's growth with improvements to roads in the City centre needing to be sought to benefit cyclists and pedestrians.	Individuals x10.
<b>Road infrastructure improvements:</b> Unable to say if the road infrastructure improvements could be funded because the full costs of the improvements (Widening lanes, adding cycle paths, and moving infrastructure such as cables) would only be worked out when the houses were built.	Individuals x10.
<b>Utilisation of Wiltshire Council car parks is low:</b> There is too much on - street parking on old residential streets that pose a danger to cyclists, however the utilisation of Wiltshire Council car parks is low with figures for December showing only some car parks exceeding 50% utilisation in 2022.	Individuals x10.
<b>Parking spaces:</b> Salisbury is over - supplied with parking spaces since the planned reduction in parking spaces in the city centre that was proposed following the introduction of Park and Ride has never happened.	Individuals x10.

Key issues raised (Policy 73 - Transport: Demand Management)	Respondent(s)
<b>Conflicting information:</b> There is conflicting information within the Local Plan, Transport Evidence Base and Revised Spatial Strategy regarding whether the traffic modelling has so far incorporated the specific impacts of Sites 8 and 9.	Individuals x10.
<b>County wide data issue:</b> The Transport Evidence Base 2022's modelling data fails to adhere to Department for Transport modelling guidance/uses incorrect data/uses county wide projections not Salisbury specific data.	Individuals x10.
<b>Site 8 and 9 will increase congestion:</b> Developments at sites 8 and 9 will increase traffic/congestion in the area.	Individuals x40.
<b>Policy 73 in Royal Wootton Bassett</b>	
<b>Charges discourage town centre shopping:</b> In Royal Wootton Bassett, the charges discourage town centre shopping especially when new retail developments such as ALDI or the proposed LIDL provide free parking. Therefore, it would be a good policy to allow free parking for the first hour to encourage footfall in the town centre.	Individuals x10.
<b>Policy 73 in Melksham</b>	
<b>No reference to the requirement for travel plans:</b> Policy 73 does not reference the requirement for travel plans which is a requirement of current JMNP Policy 11.	Melksham Town Council.



Table 5.91 [Policy 74 - Movement Of Goods] Key Issues

Key issues raised (Policy 74 - Movement of Goods)	Respondent(s)
<b>Support Policy 74</b>	
<b>Support for policy 74:</b> There is broad support for this policy, as it acknowledges major transport networks such as motorways should be utilised and prioritised for developments involving significant volumes of freight traffic.	St Modwen Logistics and the Sealy Family Trust.
<b>Rail networks for the movement of freight:</b> Encouraging the use of the rail network for the movement of freight is a significant contributor to removing Heavy Goods Vehicles and their emissions off the road network in favour of a more sustainable mode of transport. The support within the Policy for the provision of a rail freight interchange is also welcome.	Network Rail; CPRE Wiltshire.
<b>Objection to Policy 74</b>	
<b>Point V should extend to all parts of the County:</b> Point V of the policy fails all four grounds of soundness as it should extend to all parts of the county area, not just town centres. The policy requires firm, positive and comprehensive text [Policy wording amendments were suggested by the representor].	Wiltshire Climate Alliance.
<b>Policy 74 is not considered to be sound:</b> Policy 74 is not considered to be sound as it is not effective, not justified and not consistent with national policy.	St Modwen Logistics and the Sealy Family Trust.
<b>No evidence of co - operation:</b> Duty to Cooperate report makes claims about co - operation but does not evidence actual co - operation or outcomes that have contributed to formulating Policy 74.	Wiltshire Climate Alliance.
<b>Charging and alternative fuel provision are not mentioned:</b> Policy 74 contains nothing about charging or alternative fuel provision.	Wiltshire Climate Alliance.
<b>Support for the development of bypasses is needed:</b> The policy needs to support the development of bypasses wherever required to help meet its aim.	Individuals x10.
<b>Focus should have been on logistic centres and alternatives to road freight:</b> Discussions and plans should have focused on logistic centres, alternatives to road freight such as rail freight infrastructure and services, road freight GHG reduction and renewable motive power and partnership on cargo bike and EV last mile development.	Wiltshire Climate Alliance.
<b>Employment Land:</b> There is a conflict between the aspirations of Policy 74 and the lack of allocation of employment land to meet the national and strategic employment needs.	St Modwen Logistics and the Sealy Family Trust.

Key issues raised (Policy 74 - Movement of Goods)	Respondent(s)
<p><b>Minerals can only be worked where they are found:</b> Policy 74 makes no consideration of the fact that minerals can only be worked where they are found, there is no locational choice. Part i and iv disagree with Policy 72 which seeks to restrict direct access to the national primary route network or major road network outside built up areas.</p>	The Hills Group Ltd.
<p><b>Principal Settlements and Market Towns</b></p>	
<p><b>Plan fails to recognise Swindon:</b> Focusing development on Principal Settlements, if this included Swindon would have the benefit of opening up the opportunities for maximising the rail (both passenger and freight) potential on the Swindon - Gloucester/ Cheltenham line, itself the recent beneficiary of re - twin track improvements to provide capacity for improved and greater use.</p>	Thames Valley Chamber of Commerce.
<p><b>Cricklade:</b> Criteria iv. of the policy is inadequate to deal with the problems of HGV movements through Cricklade. The Core Strategy reference at paragraph 5.102 should be replicated.</p>	Cricklade Town Council.
<p><b>Core Policy 65</b></p>	
<p><b>No reference to what is stated in table A.2 Core policy 65:</b> Policy 74 makes no reference to what is stated in table A.2 Core Policy 65, merely stating a number of principles to be followed and that the Council will support others if proposals are brought forward. The only other guide to potential development is in paragraph 5.45 and the reference to the Wiltshire Local Transport Plan Freight Strategy. All of which have led to very little, if any real development of strategic hubs, local hubs and nothing at all on last mile delivery.</p>	Wiltshire Climate Alliance.
<p><b>Sustainable Last Mile Delivery Options</b></p>	
<p><b>The role of active travel modes is disregarded:</b> The SA of Policy 74 disregards the potential and expected actual role of active travel modes especially in "last mile" good movements.</p>	Wiltshire Climate Alliance.
<p><b>Freight Management:</b> "Developments in town centres generating freight movements should demonstrate how and where sustainable last mile delivery options are achievable" - this statement is misleading as it has already been identified that Wiltshire Council Highways suspended carrying out Freight Assessment and Prioritisations Mechanism in 2019 and is not carrying out any effective freight management.</p>	Rushall Parish Council.
<p><b>Transport Evidence Base</b></p>	
<p><b>10% of journeys using sustainable modes:</b> 10% of all journeys are expected to be made using sustainable transport.</p>	Individuals x10.
<p><b>23% of trips without cars:</b> 23% of trips will be made without cars appears unrealistic.</p>	Individuals x10.

Key issues raised (Policy 74 - Movement of Goods)	Respondent(s)
<b>Salisbury Transport Refresh does not take into account additional traffic:</b> Development of some early plans (Transport Refresh) for improvements to the Harnham Gyrotory and Exeter Street Roundabout, do not take into account the additional traffic from the new developments at site 8 & 9.	Individuals x10.
<b>Local Transport Plan</b>	
<b>Local Plan should not be submitted ahead of the Local Transport Plan:</b> The Local Plan should not be submitted ahead of the new Local Transport Plan (LTP4) which is still being developed. A fully operational Freight Management Strategy needs to be in place with active management.	Rushall Parish Council.
<b>Policy 74 in Devizes</b>	
<b>Routes to these sites are non - strategic 'A' roads:</b> The Nurstead Business Park and Hopton Business Parks in Devizes have seen a significant increase in freight movement and the lorry routes to these sites are non - strategic 'A' roads which have been significantly damaged by freight movement.	Rushall Parish Council.
<b>Policy 74 in Salisbury</b>	
<b>Conflicting information:</b> There is conflicting information within the Local Plan, Transport Evidence Base and Revised Spatial Strategy 2023 regarding whether the traffic modelling has so far incorporated the specific impacts of Sites 8 & 9.	Individuals x10.
<b>County wide data issue:</b> The Transport Evidence Base 2022's modelling data fails to adhere to Department for Transport modelling guidance/uses incorrect data/uses county wide projections not Salisbury specific data.	Individuals x10.
<b>An increase to the sites at Boscombe Down and Porton Down:</b> Policy 37 and Policy 38 are proposing an increase to the sites at Boscombe Down and Porton Down where the lorry route is a non - strategic road which is not suitable to support this development.	Rushall Parish Council.

**Table 5.92 [Policy 75 - Strategic Transport Network] Key Issues**

Key issues raised (Policy 75 - Strategic Transport Network)	Respondent(s)
<b>Support Policy 75</b>	
<b>Support Policy 75:</b> Policy 75 is considered to be sound and we are supportive of its inclusion.	Network Rail.
<b>The A350 as part of the Strategic Transport Network within the policy is welcomed:</b> The recognition of the A350 as part of the Strategic Transport Network (SRN) within the policy is welcomed and the wording of the policy is considered to give sufficient flexibility to allow any improvements to the A350 corridor within Wiltshire. Dorset Council therefore support the removal of the reserved bypass corridor for the A350 at Shaftesbury and the inclusion of the wording of Policy 75 related to this.	Dorset Council.
<b>Objection to Policy 75</b>	
<b>Policy 75 supports increased road capacity:</b> The policy is supporting increases in road capacity which is known will lead to an increase in road traffic and carbon emission.	Wiltshire Climate Alliance.
<b>Evidence is requested:</b> Evidence of long term and deliverability are requested.	Individuals x10.
<b>Policy 75 is unsound:</b> Policy 75 is unsound as metrics to measure the impact of this policy are missing and/or have no baseline measure assigned to them.	Wiltshire Climate Alliance.
<b>No specific plans or targets for improving the rail network:</b> Although rail improvements are mentioned, they are only to be 'considered'. There are no specific plans, targets or metrics for either improving the rail network or shifting freight and passenger journeys to rail, only a commitment to improve the rail network therefore this policy will not be effective and is therefore not sound.	CPRE South Wiltshire Group.
<b>Local transport issues need to be addressed:</b> Policy 75 places emphasis on the Strategic Road Network, particularly the A350 and the majority of infrastructure funding in the IDP is directed towards the SRN. Local transport issues need to be addressed to avoid traffic increases on the SRN which will create traffic jams and pollution on the SRN.	CPRE Wiltshire.
<b>Neighbouring Authorities:</b> No evidence that Wiltshire Council have consulted and collaborated with neighbouring authorities regarding the strategic transport network in the area.	Community Action Whitley and Shaw.
<b>New developments are not linked to sustainable transport networks:</b> Many new developments are not linked to sustainable transport networks and are a considerable distance from public transport stops. This leads to an over - dependence on people using private cars.	Calne Without Parish Council.



Key issues raised (Policy 75 - Strategic Transport Network)	Respondent(s)
<p><b>Expensive road proposals along the MRN and SRN will undermine attempts to reduce traffic:</b> The Infrastructure Delivery Plan remains dominated by expensive road proposals along the MRN and SRN which would fundamentally undermine attempts to reduce traffic, particularly new traffic generated by the unsustainable sites proposed in the plan.</p>	CPRE South Wiltshire Group.
<p><b>Support for dual - carriageway bypasses are needed:</b> The policy needs to support the development of dual - carriageway bypasses wherever required to help meet its aim.</p>	Individuals x10.
<p><b>A failure to comply with the duty to cooperate:</b> The exclusion of Network Rail from the formulation of policy on public transport and strategic transport networks seems a serious omission and shows a failure to comply with the duty to cooperate.</p>	Wiltshire Climate Alliance.
<b>General</b>	
<p><b>National Highways:</b> National Highways is responsible for maintaining and managing the A36 and A303 corridors as part of planning applications through the Local Plan process or through liaison with the local planning and highway authority. National Highways would look to the Local Plan Review and associated evidence base to identify the need for improvements across the SRN resulting from planned housing and employment growth.</p>	Highways England.
<p><b>Holding objections have been issued:</b> National Highways have issued holding objections for development on the periphery of Frome and villages near the A36 until a programme of improvements is in place.</p>	Somerset Council.
<p><b>Historically Wiltshire have done far more to promote road improvements than rail:</b> SA objective 11 (Transport) the score is considered 'minor positive' with the text explaining that the policy aims to improve a number of railway stations and 'demonstrates a clear commitment to invest in improving the local transport infrastructure and sustainable transport options. However historically Wiltshire have done far more to promote road improvements than rail, and there is nothing in this Policy which suggests that this will be changing. Therefore, the SA is unsound in respect of this policy.</p>	Wiltshire Climate Alliance.
<p><b>Further engagement with stakeholders:</b> Given the uncertainty involved over the outcomes of the National Highways Strategic M4 to South Coast Study, to add into the policy or accompanying text would require further engagement with stakeholders should the study support A350 road improvements would be needed.</p>	National Trust.
<p><b>Landscape:</b> The policy and supporting section do not mention that many roads and railway lines pass through National Landscapes, which contribute positively to the experience of travellers.</p>	Cranborne Chase Area of Outstanding Natural Beauty.
<b>Principal Settlements</b>	

Key issues raised (Policy 75 - Strategic Transport Network)	Respondent(s)
<b>Plan fails to recognise Swindon:</b> The failure to identify Swindon as a Principal Settlement and identify a locational development strategy based on the opportunities that this would afford means that all transport policies are effectively compromised to a degree because of the inability of the Local Plan to fully exploit sustainable travel options.	Thames Valley Chamber of Commerce.
<b>Monitoring</b>	
<b>Section 8 on monitoring:</b> Section 8 on Monitoring is deficient in respect of transport.	Wiltshire Climate Alliance.
<b>Policy wording</b>	
<b>Policy wording amendments:</b> Proposed investments in non - car transport [Policy wording amendments were suggested by the representor].	White Horse Alliance.
<b>Local Transport Plan</b>	
<b>Transport Plan:</b> A transport plan needs to be created that is precise, current and financially viable which should also encompass practical and safe sustainable transport alternatives.	Individuals x10.
<b>Consultants were unable to formulate a plan:</b> Wiltshire Council has stated that their consultants were unable to formulate a plan that includes the required additional capacity with bus priority and cycle provisions compliant with LTN1/20.	Individuals x10.
<b>Transport Evidence Base</b>	
<b>23% of trips without cars:</b> 23% of trips will be made without cars appears unrealistic.	Individuals x10.
<b>Quarter of trips to be made without using the car:</b> Around a quarter of trips will be made without using the car which seems completely unrealistic especially as there are no additional buses planned. People will need to use their cars for work, schools etc.	Individuals x60.
<b>Conflicting information:</b> There is conflicting information within the Local Plan, Transport Evidence Base and Revised Spatial Strategy regarding whether the traffic modelling has so far incorporated the specific impacts of Sites 8 and 9.	Individuals x10.
<b>Modelling guidance:</b> The Transport Evidence Base 2022's modelling data is criticised for serious weaknesses, as it fails to adhere to certain Department for Transport modelling guidance, such as how the model responds to traffic congestion, rendering it unreliable for drawing conclusions.	Individuals x10.

Key issues raised (Policy 75 - Strategic Transport Network)	Respondent(s)
<b>10% of journeys using sustainable modes:</b> 10% of all journeys are expected to be made using sustainable transport which seems unrealistic.	Individuals x50.
<b>Salisbury Transport Refresh does not take into account additional traffic:</b> Development of some early plans (Transport Refresh) for improvements to the Harnham Gyrotory and Exeter Street Roundabout, do not take into account the additional traffic from the new developments at site 8 & 9.	Individuals x80.
<b>Harnham Gyrotory capacity issues:</b> Traffic gridlock will worsen as a result of development at Sites 8 & 9 and The Transport Evidence Base already says that the Gyrotory will be at 97% capacity by 2036. Anything over 85% capacity means that the road infrastructure can no longer cope with the traffic.	Individuals x40.
<b>Policy 75 does not take account of the recommendations in the Transport Evidence Base:</b> Policy 75 does not take account of the recommendations in the Transport Evidence Base (Scenario 4 seeks a 13% reduction in road transport and a 35% increase in public transport) and does not give any indication how the policy will assist in meeting goals which have been set out.	Wiltshire Climate Alliance.
<b>Climate Change</b>	
<b>Transport Evidence Base:</b> The policy is unsound as it fails to take steps in the Transport Evidence Base that are necessary to meet climate change obligations set out by Section 19 (1A) of the Planning and Compulsory Purchase Act 2004. Policy 75 is not legally compliant because it contains measures to increase road traffic and carbon emissions.	CPRE South Wiltshire Group; Wiltshire Climate Alliance.
<b>Climate Impacts:</b> Policy 75 should include assessing for climate impacts of new road improvements.	Corsham Town Council.
<b>Modal Shift</b>	
<b>Transport Evidence Base:</b> There is a lack of evidence that the policy levers outlined in the Transport Evidence Base 2022, promoting a shift away from private cars to other modes like walking, cycling and buses can be effectively implemented.	Individuals x10.
<b>Road network:</b> Policy 75 gives more detail about schemes to enhance the road network rather than plans to enhance the rail network and to encourage modal shift to rail.	Cycling Opportunities Group Salisbury.
<b>Rail Network</b>	
<b>Rail infrastructure:</b> If Corsham, Devizes, Royal Wootton Bassett and Westbury rail infrastructure is all to be enhanced and we are able to make the most of public transport, this should be reflected in the allocation of housing targets, but they are not in the proposed plan.	Individuals x10.

Key issues raised (Policy 75 - Strategic Transport Network)	Respondent(s)
<b>Emphasis on road improvements rather than on rail:</b> Historically in Wiltshire there has been more emphasis on road 'improvements' than on rail and deliverability of road projects has proved easier than delivering rail. However, this situation must change.	Wiltshire Climate Alliance.
<b>Network Rail:</b> The Policy does not reflect the more positive approach adopted by Network Rail and their commitment to looking at potential new services which could be introduced in Wiltshire.	Wiltshire Climate Alliance.
<b>Development of railway stations should not be at the expense of bus routes:</b> The emphasis on the development of new railway stations at Devizes and Corsham should not be at the expense of both primary and secondary bus routes which serve a wider population.	Individuals x10.
<b>Pewsey Station:</b> Figure 3.2 identifies the transport network; however, the policy then omits Pewsey Station which is clearly marked on Figure 3.2 and is also on the strategic bus route. Pewsey Station is omitted from the list of stations despite the station being put forward by GWR for accessibility improvements for Department of Transport funding and despite Pewsey Rail User Group being part of the Wiltshire Strategic Rail Study being conducted by Network Rail that also includes representatives from Wiltshire Council.	Rushall Parish Council.
<b>A lack of interest has been demonstrated to enhance rail capacity:</b> By placing road and rail into strategic corridors defined by road numbers, a lack of interest has been demonstrated to enhance rail capacity and serve the needs of populations in major travel to work areas.	White Horse Alliance.
<b>Strategic Bus Network</b>	
<b>No policies relating to the strategic bus network:</b> Other than a single mention there are no policies relating to the strategic bus network or what measures will be put in place to ensure buses are available as a genuine alternative with no targets or metrics for shifting journeys to bus and therefore the policy cannot be effective and is therefore not sound and will not achieve the reduction in private motor vehicle traffic necessary for the council to meet its legal obligations.	CPRE South Wiltshire Group.
<b>Coordinated approach is required:</b> Discussions around the provision of bus routes are considered essential to deliver a coordinated approach.	Dorset Council.
<b>Improvements are required:</b> Improvements to both the strategic bus network and the rail network are required for the Council to meet its legal obligations.	CPRE South Wiltshire Group.
<b>Strategic bus routes:</b> It is welcomed that strategic bus routes are supported in Policy 75.	Calne Without Parish Council.
<b>Policy 75 in Corsham</b>	

Key issues raised (Policy 75 - Strategic Transport Network)	Respondent(s)
<p><b>Railway Station:</b> The aspiration to re-open a railway station at Corsham is supported. The potential for re-opening a station would help to cement Corsham being a sustainable location and provide opportunities for current and new residents to easily travel using a sustainable mode of transport.</p>	Great Tew Bantham Estates LLP.
<p><b>Land at Corsham Railway Station:</b> The land at Corsham Railway Station should not be safeguarded or its ongoing and future uses influenced, by the aspirational proposals for a railway station and associated infrastructure. The land identified on the WLP policies map encroaches slightly into established commercial land and there has been no direct discussions with the landowner. Based on information and evidence currently available the landowner does not support the inclusion of their land as part of a wider area of land to be safeguarded for a future railway station without any development plan document.</p>	LPC Town and County Planning Development Consultants.
<p><b>Policy 75 in Devizes</b></p>	
<p><b>Devizes Parkway railway station:</b> The provision of a Devizes Parkway railway station will have a significant impact on the visitor economy of Devizes. A railway station will support the increased provision of public transport linking the two parts of the Stonehenge and Avebury World Heritage Site.</p>	Wiltshire Museum.
<p><b>Policy 75 in Melksham</b></p>	
<p><b>A350 Improvements:</b> There is insufficient evidence of the role of the A350 improvements in supporting growth at Melksham. It is also not clear if such a proposal would be supported or not, or on what basis and how decisions would be made. References are made to several different factors such as employment but without a clear conclusion with regard to strategic intent.</p>	Melksham Town Council; Westwood, Semington and Wingfield Parish Councils; Melksham Without Parish Council; Community Action Whitley and Shaw.
<p><b>No further development buffer zone:</b> If the A350 bypass is to go through the gap between the Kennet and Avon and Bowerhill, we think it is absolutely vital that a no further development buffer zone is established to the North of the Canal.</p>	Westwood, Semington and Wingfield Parish Councils.
<p><b>Policy 75 in Salisbury</b></p>	
<p><b>The policy does not mention the needs of the elderly population:</b> Policy 75 does not mention the needs of the elderly population in the strategic transport network for Salisbury and should be amended to reflect the needs of the elderly for access to good public transport and to provide frequent, dedicated public transport links should be a precondition of all future developments in the Salisbury area in particular.</p>	Individuals x10.
<p><b>A36 Funding:</b> The absence of confirmed funding from National Highways for the A36 improvements raises concerns if the improvements are deliverable despite promises to deliver by 2028.</p>	Individuals x10.

Key issues raised (Policy 75 - Strategic Transport Network)	Respondent(s)
<b>Development has taken place with no support for traffic growth:</b> Building developments in Salisbury have been allowed to take place with no improvements undertaken to support traffic growth.	Individuals x10.
<b>Road network capacity:</b> Wiltshire Council have identified the A36 as being a strategic route and the A338 as a primary route but have not identified how the increase in traffic that will be generated will be catered for.	White Horse Alliance.
<b>County wide data issue:</b> The Transport Evidence Base 2022's modelling data fails to adhere to Department for Transport modelling guidance/uses incorrect data/uses county wide projections not Salisbury specific data.	Individuals x10.
<b>A36 Improvements:</b> Improvements for the A36 are deemed insufficient to bring about meaningful enhancements in traffic flow.	Individuals x10.
<b>A303 proposals:</b> It is unsound to include the wording at paragraph 5.50 suggesting that the A303 proposals would enhance the historic landscape since the planning inspectorate have determined the impact would be significant adverse.	Wiltshire Climate Alliance.
<b>Site 12:</b> Site 12 is on the A36 ring road loop and when you add this to the expected increase in commuter traffic then this additional contribution is of great concern due to the adverse health effects of emissions and irritant dusts. We would have expected the potential impacts of these pollutants to have been presented in the Transport Assessment.	Wilton Town Council.
<b>Inconsistencies between policy 75 and the Infrastructure Delivery Plan:</b> There are inconsistencies between this policy and the September 2023 Infrastructure Delivery Plan which refers to a new railway station at Wilton, costing £33 million. This is not mentioned in Policy 75 with the Transport Evidence Base giving 'Wilton Railway Station' an uncertainty category of 'hypothetical'. Since the Infrastructure Delivery Plan does not reflect infrastructure which is itemised in the Local Plan this policy is unsound.	Cycling Opportunities Group Salisbury.
<b>Wilton Junction Railway Station:</b> Since 2015 Wiltshire Council, TransWilts and GWR have undertaken substantial work in a case for the re - opening of Wilton Junction Railway Station. A new four - platform station at Wilton Junction would link into emerging plans for enhanced services on the West of England and TransWilts routes, complementing the proposed masterplan for the Salisbury station area. It provides an accessible transport hub adjacent to one of Wiltshire's areas of high deprivation, opening up economic and educational opportunities and alleviating congestion on the A36 to Salisbury. Expanding Policy 75 to include Wilton Junction further increases Wiltshire's sustainable transport offer.	Wiltshire Council Councillor.
<b>Policy 75 in Rural Areas</b>	

Key issues raised (Policy 75 - Strategic Transport Network)	Respondent(s)
<p><b>Rural Bus Routes:</b> There is no support for other bus routes. "Non-Strategic" bus routes are often used in rural communities to travel to local towns or connect with a strategic route. This omission discriminates against rural bus users.</p>	<p>Individuals x10; Calne Without Parish Council.</p>

## Local Plan section 5: Delivering the spatial objectives, Social

**5.30** Please see below the key issues tables listing the key issues raised for the parts of the plan within section 5: delivering the spatial objectives (Social policies), namely:

- Social section overall
- Policy 76: Providing affordable homes
- Policy 77: Rural exceptions sites
- Policy 78: Meeting Wiltshire's housing needs
- Policy 79: First Homes exception sites
- Policy 80: Self and custom build housing
- Policy 81: Community facilities
- Policy 82: Housing in the Countryside
- Policy 83: Health and wellbeing
- Policy 84: Open space and play facilities



Table 5.93 [Insert policy number / local plan reference] key issues

Key issues raised (Insert policy xx / local plan reference)	Respondent(s)
<b>Paragraph 5.58 and Figure 5.1</b>	
<b>Supports affordable housing being provided on smaller sites within the AONBs</b>	Cranborne Chase Area of Outstanding Natural Beauty
<b>Policy 77 Rural Exception Sites</b>	
<b>Policy 77 risks siting development in unsustainable locations with adverse environmental impacts:</b> On the edges of villages, some distance from facilities and services which those occupying affordable housing are most likely to be in need of. It is highly likely that 'exception' locations in AONB situations are going to have adverse environmental impacts which decision - makers may be tempted to underestimate. Amend Policy 77 so that it only applies outside the designated AONBs.	Cranborne Chase Area of Outstanding Natural Beauty
<b>Policy 82 Housing in the Countryside</b>	
<b>Tighten Policy 82 in relation to the appearance and function of the building in the context of the nationally designated landscape and the immediate setting:</b> to ensure a real and meaningful enhancement of the setting.	Cranborne Chase Area of Outstanding Natural Beauty
<b>First Homes</b>	
<b>Supports Paragraph 5.76:</b> 'First Home exception sites' are excluded from AONBs	Cranborne Chase Area of Outstanding Natural Beauty

Table 5.94 [Policy 76 - Providing affordable homes] key issues

Key issues raised (Policy 76 - Providing affordable homes)	Respondent(s)
<b>Local Housing Needs Assessment (LHNA) Part 2</b>	
<p><b>Rent to buy housing has not been considered:</b> The LHNA has not considered the need for a range of affordable housing home ownership products including rent to buy homes due to it being based upon the outdated Census 2011. It excludes large numbers of households. The assessment is not consistent with the NPPF. It is based on a single product - a discount market sale option at 50% of a lower quartile new build home, but the NPPF defines a range of products to meet different needs. The LHNA should assess whether households can afford to purchase a rent to buy home with a zero savings requirement; a shared ownership home with upper and lower percentage share purchase and a first home with the standard 30% discount against open market value. Also assess needs from households who are currently social renters, but whose circumstances allow them to consider an ownership product such as Rentplus.</p>	Rentplus UK Ltd.
<p><b>Affordable housing need at a sub local authority area level has not been assessed:</b> Despite the LHNA Vol 1 identifying 4 distinct housing market areas and the Viability Assessment suggesting there to be six value areas, there is no assessment within LHNA Vol 2. It cannot be concluded whether a blanket 40% target should be applied, or whether separate targets are needed for each HMA.</p>	Robert Hitchens Ltd.
<b>Designated Rural Areas</b>	
<p><b>Amend Figure 5.1 to exclude New Forest National Park from the designated rural areas:</b> But support wording that sets out a lower site size threshold for affordable housing delivery in designated rural areas of Wiltshire. This is consistent with the approach taken in the adopted new Forest National Park Local Plan 2019 and with PPG on Planning obligations.</p>	New Forest National Park Authority.
<p><b>Support 40% requirement for 10 dwellings and above, but the designated rural areas requirement doesn't fit with the current status of villages in Wiltshire:</b> Disagree with the use of designated rural areas based on a definition and eligibility criteria taken from the Housing Act 1985 and which this applies to 5 or more dwellings rather than 10 dwellings. Using the 1985 designation doesn't fit with what the current status of villages in Wiltshire. Suggest a different designation be used for example. the Governments Rural Urban Classification.</p>	Melksham Without Parish Council.
<p><b>Designated rural areas requirement is not supported by the evidence:</b> It is unclear how these areas are able to support this level of provision compared to others and demonstrating that registers providers would be willing to take on as little as 2 units across small sites such as this. There is also a lack of clarity regarding what constitutes an exceptional circumstance to show why on site delivery is not possible and how a commuted sum would be calculated and secured.</p>	Gaiger Brothers.

Key issues raised (Policy 76 - Providing affordable homes)	Respondent(s)
<b>Policy 76 should only be required for major development:</b> Where major development should be defined as of 10 or more, or 0.5ha or more.	Brimble Lea.
<b>Affordable Housing Need</b>	
<b>Supports 40% affordable housing provision:</b> As well as this, different types of specialist accommodation for older people being required.	Warminster Town Council.
<b>Supports 40% affordable housing requirement.</b>	Marlborough Town Council (Town Clerk).
<b>Supports in principle:</b> Providing affordable homes for local people in a significant concern., subject to ensuring homes for people renting and buying are genuinely affordable.	Bradford On Avon Town Council.
<b>Supports 40% provision, but the tenure mix should also include social rent:</b> To ensure homes remain within the reach of the poorest in society. Suggested amendment is to offer a reduction in the percentage of overall affordable housing in a development. if a proportion is provided at social rent levels.	Calne Without Parish Council.
<b>Concerned about developers not providing affordable housing on their schemes:</b> Developers will not comply with any commitments which are not legally binding; Developers with smaller sites will build up to the threshold to avoid including affordable housing; Developers will seek planning permission before the Local Plan is adopted and will not have the required 40%.	Individuals x10; Sustainable Calne; CPRE.
<b>First Homes Exception Sites</b>	
<b>Supports Policy 79 First Homes in principle:</b> Subject to more of these homes being provided rather than affordable homes to help first time buyers get on the housing ladder.	Individual x10.
<b>Specialist Accommodation</b>	
<b>The care homes and specialist accommodation criterion are unclear:</b> Policy 78 does not make it sufficiently clear that care homes and other specialist accommodation are limited to Principal Settlements and Market towns due to a lack of evidence on infrastructure provision at other locations. Amend Policy 78 to demonstrate healthcare infrastructure is sufficient to cope with new elderly accommodation.	Tisbury Parish Council.
<b>Policy 76</b>	
<b>Support Policy 76</b>	Mac Mic Group; Hill Residential Ltd; L&Q Estates; L& Q Estates; David Wilson Homes (Senior Planning Manager); Leda Properties Ltd; Richborough Estates; Castlewood

Key issues raised (Policy 76 - Providing affordable homes)	Respondent(s)
	Properties; Ventures Ltd; Wyatt Homes; Caroline Crossman; Chippenham Town Council; Tisbury Parish Council.
<p><b>Policy 76 and paragraphs 5.54-5.61 is not effective, not justified and not consistent with national policy. Revise to be sound:</b></p> <p>1. Express affordable housing requirement as a single figure rather than a range. More than 40% is not supported by the VA evidence. Include flexibility to enable commuted sums to be sought. 2. Be clearer on whether the policy enables less than 40% to be provided and include flexibility to enable commuted sums to be sought. 3. The proposed tenure mix is not supported by the VA evidence. The reference to changing the tenure mix is misleading. 4. Policy 78 does not address the spatial differences in viability that were found in the Viability Assessment. Policy 76 does include some flexibility in terms of tenure, but no flexibility in terms of the number of units. Reducing the amount of affordable housing should be considered to make an unviable scheme viable.</p>	Home Builders Federation.
<p><b>Supports Policy 76 in principle subject to further clarification on "65% affordable housing for rent" and whether this includes social rented housing:</b> Has concerns about First Homes and potential implications on the delivery of traditional forms of affordable housing being addressed with shared ownership being more accessible and flexible. Request that the First Homes Policy is applied in Wiltshire in a similar vein to other local authority areas where First Homes is included as a possible home ownership option or excluded on the basis of not meeting needs. Pleas that management and maintenance of affordable housing is considered in site distribution.</p>	South West Housing Association Planning Consortium (SWHAPC).
<p><b>Developers give emphasis to shared ownership units at the expense of homes for rent:</b> Extent of affordable housing provision is reduced and preference given to schemes that trap first time buyers into schemes that economically they cannot escape from.</p>	Individual x10.
<p><b>Amend Policy 76 to be more flexible and consider affordable housing on a settlement area basis , rather than individual sites:</b> So that there can be some flexibility on how, and exactly where, affordable housing is to be located, within an overall target set by policy. This would mitigate against site characteristics that may be too small, contain heritage or economic constraints etc.</p>	Community Action Whitley and Shaw(CAWS).
<b>Policy 76 Tenure Mix and Viability</b>	
<p><b>Supports caveat that affordable housing may vary on a site by site basis.</b></p>	Bloor Homes (South West) Ltd; Society of Merchant Venturers (SMV); Richborough.

Key issues raised (Policy 76 - Providing affordable homes)	Respondent(s)
<b>Supports in principle:</b> Clarification should be added that provision must be the subject of viability testing at the planning application stage.	Bloor Homes South West(Land to the North of A3102, Melksham); Bloor Homes South West ; Castlewood Commercial Properties; Paul Bowerman Discretionary Trust; Waddeton Park Ltd; TOF Corporate Trustees Ltd; Bellway Homes.
<b>Unclear whether affordable housing delivery and commitments has been taken into account:</b> If so, this would reduce the affordable need.	Persimmon Homes (South Coast) & Persimmon Homes (Wessex) Ltd; Bloor Homes (South West) Ltd.
<b>Shared ownership and First Homes tenures are not justified by the LHNA:</b> The tenures are not consistent with national policy and are not justified. NPPF Annex 2 sets out a wider range of other affordable routes to home ownership, including rent to buy. Greater flexibility in tenure types can support the viability of schemes, by diversifying the tenure offer. Amend Policy 76 tenure mix to specify "affordable routes to home ownership" in place of "shared ownership".	Rentplus UK Ltd.
<b>Has concerns about the viability assumptions informing the policy:</b> GDV; developer profit on market housing, allowance for infrastructure works and benchmark land value. These go to the heart of the setting of realistic, deliverable, policies including affordable housing.	Ludgershall Homes.
<b>Supports in principle, subject to tenure mix being deleted:</b> Affordable housing needs are likely to change over the plan period and across the County. Important to meet local needs at the time of development coming forward and taking into account site specific circumstances. Delete tenure mix from Policy 76.	Miller Homes; Society of Merchant Venturers (SMV).
<b>% Affordable Housing Provision</b>	
<b>Supports in principle:</b> This provision should be subject to viability testing to confirm if 40% can be achieved as a blanket approach.	Wainhomes(Severn Valley)Ltd; Ludgershall Homes.
<b>Lack of flexibility to allow for a lower contribution of less than 40%:</b> The policy is unclear whether site specific circumstances, such as viability would allow for a lower contribution of less than 40% affordable housing. The policy does not allow developers to react flexibly to changing economic circumstances. Amend the policy.	St Phillips Land Ltd; Persimmon Homes (South Coast) Ltd and Persimmon Homes (Wessex) Ltd; Robert Hitchens Ltd.
<b>Supports inclusion of caveat:</b> Supports caveat that affordable housing may vary on a site by site basis.	Bloor Homes (South West) Ltd; Society of Merchant Venturers (SMV).

Key issues raised (Policy 76 - Providing affordable homes)	Respondent(s)
<p><b>A two target approach may be justified:</b> Support Policy 76 in principle, but the policy should again be subject to viability testing and if the disparities remain then a two target approach would be justified and should be included in the policy to provide clarity.</p>	<p>White Horse Country Club Ltd; Martin Grant Homes; Hannick Homes; Gleeson Land.</p>
<p><b>Supports current 30/40%, Increasing to 40% in some areas will cause delays and deliverability issues:</b> Policy 76 puts the emphasis of affordable housing under provision onto developers to argue viability rather than being realistic in the first instance. Varying on a site by site basis will lead to more arguments and delays and deliverability issues. This is not consistent with NPPF.</p>	<p>[Cherry, Carol and Julie Porter, Whapshare and Pearce; Yvonne Whittaker; Stephanie Davis.</p>
<p><b>'At least 40%' requirement is not justified, not viable and not in line with national policy:</b> PPG says affordable housing requirements should be expressed as a single figure, rather than a range. "At least 40%" is a range,, is contrary to national guidance, is not supported by the evidence base and not tested in the Viability Assessment.</p>	<p>L&amp;Q Estates; Bellway Homes.</p>
<p><b>Rerun the older persons housing typology in the Viability Assessment:</b> Welcome the testing of sheltered and extra -care housing on brownfield and greenfield sites in the six value areas as a separate typology within the Viability Assessment, but have concerns over some of the assumptions used or missing specifically from the older persons housing category. The older persons housing typology should be rerun using all characteristics and if older persons housing found not to be viable to deliver 40% affordable housing, the policy should be amended to reflect the outcome.</p>	<p>McCarthy Stone Retirement Lifestyles Ltd.</p>
<p><b>Brownfield Development</b></p>	
<p><b>Previously developed land is mentioned in the supporting text, but not in Policy 76:</b> Policy 76 should acknowledge that specific targets are set for some of the Plan's allocations. Include a reduction in any affordable housing requirement for any PDL, whether allocated or otherwise (windfall). A varied approach, rather than the flat rate is appropriate in respect of the urban regeneration schemes.</p>	<p>Hills Homes.</p>
<p><b>Clustering</b></p>	
<p><b>The reference to small clusters is too vague:</b> It should be based on a maximum concentration of affordable housing within a scheme. Supports the approach to management and maintenance being taken into account.</p>	<p>Persimmon Homes (South Coast) &amp; Persimmon Homes (Wessex) Ltd.</p>
<p><b>Clustering approach is unsound:</b> Given the inclusion of a maximum cluster size of 15 affordable homes, the minimum threshold is unnecessary and unjustified. The two cluster approach on smaller sites has the potential to act as a design constraint working against site specific circumstances.</p>	<p>White Horse Country Club Ltd; Martin Grant Homes; Hannick Homes; Gleeson Land.</p>
<p><b>Types of Housing</b></p>	

Key issues raised (Policy 76 - Providing affordable homes)	Respondent(s)
<p><b>Clarification required regarding housing types:</b> Neither the policy nor the supporting text clarify whether this policy relates only to C3 housing or whether other types of housing would be required to deliver affordable housing.</p>	Opus Villages.
<p><b>Neighbourhood Plans</b></p>	
<p><b>Support 40% in principle:</b> Allow for flexibility in the tenure mix where Neighbourhood plans exist.</p>	Ed Jones.
<p><b>Broadly aligns with Joint Melksham Neighbourhood Plan:</b> Suggested amendment is that Policy 76 should define all settlements that it applies to.</p>	Melksham Town Council.

**Table 5.95 [Policy 77 - Rural Exception Sites] key issues**

Key issues raised (Policy 77 - Rural Exception Sites)	Respondent(s)
<b>Support:</b> Supports the inclusion of Policy 77.	Acorn Construction (Newbury) Ltd; Land Values Alliance LLP (LVA);Melksham Town Council.
<b>Location</b>	
<b>The requirement to be adjoining the built area is very limiting and restrictive:</b> The policy should support sites which are in sustainable locations ,whether these are adjacent to a built area or not.	Individuals x10.
<b>It is unclear as to why rural exception sites would only be supported at Local Service Centres, Large Villages and Small Villages:</b> Provision should also be made for rural exception housing at and around Market Towns who also have identified housing and affordable housing needs. e.g. Malmesbury and Devizes.	Miller Homes; Society of Merchant Venturers{SMV}.
<b>Support in principle affordable housing being provided on smaller sites within the National Landscapes, but affordable homes need to remain affordable:</b> This is uncertain and Policy 77 could result in development in unsustainable locations.	North Wessex Downs Area of Outstanding Natural Beauty; Cranborne Chase Area of Outstanding Natural Beauty.
<b>National Landscapes:</b> It is likely that ‘exception’ locations in National Landscapes will have adverse environmental impacts - recommend that Policy 77 only applies outside of National Landscapes.	Cranborne Chase Area of Outstanding Natural Beauty.
<b>Site Threshold</b>	
<b>The thresholds proposed are inconsistent with the NPPF and lack justification:</b> The NPPF does not specify any limits in size . There is a conflation with national planning policy for entry exceptions sites. Policy 77 constrains the ability of rural exception schemes to make an effective contribution towards meeting affordable housing need. Limiting to no more than 20 dwellings or 5% of the settlement size is considered to be an arbitrary limit. It is important that the delivery of much needed housing is not prohibited by artificial limits on site area or capacity. It is important that a flexible and positive approach is taken to considering such schemes.	Robert Hitchens Ltd; Hollins Strategic Land; Wain Estates Ltd; European Property Ventures(Wiltshire); J Huggett, R Huggett, Q Huggett, S Huggett, Heirs Stuart Huggett; Kington Farms Ltd; Miller Homes; Society of Merchant Venturers (SMV); Hallam Land Management.
<b>Policy 77 is too prescriptive and lacks robust justification:</b> The rigid nature of the policy wording would likely inhibit the ability to maximise the affordable housing opportunities for rural exception sites throughout Wiltshire and would negatively impact the ability of housing associations to bring forward sites in an already competitive land market. Twenty dwellings could very easily be a small proportion of a settlements size and could discourage providers from delivering schemes in rural areas. Suggested amendment is to separate the two policy requirements to allow for rural exception sites and other affordable housing led developments on the edge of settlements (potentially expanding draft Policy 82).	South West Housing Association Planning Consortium (SWHAPC).



Key issues raised (Policy 77 - Rural Exception Sites)	Respondent(s)
<p><b>Object to the increase in the number of dwellings to 20 from 10 in Core Policy 44, unless it is shown to be supported through a relevant Neighbourhood Plan:</b> The present 10 ensures the scale and type of development is appropriate to the nature of the settlement. A larger number could create ghetto type sites.</p>	CPRE Wiltshire.
<p><b>Supports the increase in the upper limit from 10 to 20 homes.</b></p>	Calne Without Parish Council.
<p><b>Type, Size and Tenure</b></p>	
<p><b>NPPF does not required rural exception sites to be assessed using a primary survey:</b> This would depart from the wider approach of using secondary data (using the Standard Method) to assess the need for overall housing. Amend Bullet Point 2 to enable affordable housing needs to be evidenced through a local housing needs assessment or survey. NPPF Paragraph 12 does refer to appropriate evidence such as a survey, but this is an example of a possible approach as opposed to an instruction to require primary data survey and refuse secondary data surveys. Secondary data assessments , which provide a more economical approach for those seeking to provide affordable housing and where finances will already be challenging, are deemed acceptable methods of assessing local housing needs at a Parish/small area level e.g. Designated Neighbourhood Plan Area Housing Figures.</p>	Robert Hitchens Ltd.
<p><b>Support the housing register as an evidence base:</b> It is appropriate and accessible source of information for applicants.</p>	South West Housing Association Planning Consortium (SWHAPC).
<p><b>Market Housing</b></p>	
<p><b>The NPPF does not specify a proportion or state that it must be below a certain level. Delete 33% proportion and assess each application on its own merit:</b> The intention is to facilitate delivery where viability issues apply through the provision of an element of market housing. Being overly prescriptive about the proportion of market housing may prevent the much needed affordable housing being delivered because one additional market housing unit is required for example. Site Specific viability testing and cross subsidy through the inclusion of market units in excess of 33% may still be necessary for such sites. Delete reference to land value in second paragraph bullet point 2. All such matters can be assessed based on the viability evidence submitted in support of the proposals at the time of the application.</p>	Robert Hitchens Ltd.
<p><b>The justification for this cap is not clear in light of the significant level of affordable housing need in Wiltshire. Allow a greater proportion of market housing:</b> This would provide a greater degree of flexibility and scope to deliver affordable housing in areas of significant need. Cornwall Local Plan includes a rural exception policy with an allowance of up to 50% market housing. This is a more appropriate balance where the mix can be justified by viability evidence.</p>	Hollins Strategic Land; Wain Estates Ltd.

Key issues raised (Policy 77 - Rural Exception Sites)	Respondent(s)
<p><b>The policy should be more flexible to support viability:</b> Allow rural exception sites to include a higher proportion of market housing within larger developments where it is demonstrated that a scheme would deliver additional community benefits that have been secured and agreed in collaboration with local stakeholders.</p>	<p>Individual x1; Land Values Alliances LLP (LVA).</p>
<p><b>Do not support the inclusion of open market housing for more than one dwelling in every ten.</b></p>	<p>CPRE Wiltshire.</p>
<p><b>Natural Environment</b></p>	
<p><b>Amendment to policy:</b> Policy wording should include a caveat to ensure appropriate protection of biodiversity and landscape interests is applied:</p>	<p>Natural England.</p>
<p><b>Design</b></p>	
<p><b>The achievement of high quality design is important, including having regard to appropriate sources of guidance:</b> In any potential development, the achievement of high quality design must take regard of design guidance from appropriate sources including Wiltshire Design Guide, Neighbourhood Plans, Village Design Statements and Conservation Area Statements.</p>	<p>Keevil Parish Council.</p>
<p><b>Climate</b></p>	
<p><b>Policy 77 is unsound and not legally compliant because all development contributes to significant carbon emissions:</b> Climate Change Act 2008 says all policies in this plan that have an effect upon carbon emissions must seek to avoid or minimise these.</p>	<p>Wiltshire Climate Alliance.</p>

Table 5.96 [Policy 78 - Meeting Wiltshire's housing needs] key issues

Key issues raised (Policy 78 - Meeting Wiltshire's housing needs)	Respondent(s)
<b>Supports Policy 78</b>	Defence Infrastructure Organisation; Individuals x10.
<b>Policy 78 is sound in principle, subject to ensuring its application is cautious:</b> so it does not create an undue burden on the providers of accommodation for older people to ensure timely delivery.	Mac Mic Group; Hill Residential Ltd; David Wilson Homes (Senior Planning Manager); Leda Properties Ltd; Paul Bowerman Discretionary Trust.
<b>Supports Policy 78 requirements:</b> Specifically, the requirement to ensure schemes are only considered if potential adverse impacts on environmental, landscape and heritage interests can be suitably addressed.	Natural England.
<b>Swindon HMA</b>	
<b>Supports Policy 78:</b> However, the failure to identify Swindon as a Principal Settlement means that it will not assist housing delivery in the Swindon HMA: It does not take advantage of extending the west of Swindon urban area.	Thames Valley Chamber of Commerce Group.
<b>Paragraph 1 Bullet Point 1 Housing Size and Types</b>	
<b>The policy is overly rigid. Include suitable flexibility in regard to housing size and type:</b> As well as consideration of local housing need, take into account the context of the site as well. Although the policy allows for updated needs assessments or other credible evidence it fails to specifically recognise the relevance of local context as part of the place making process.	Hills Homes.
<b>Unjustified requirement for older people and requiring the size and type of all housing to reflect the housing need:</b> It fails to account for: 1. developer preference and market flexibility so that viability and delivery are not compromised; 2. Need for different house types on different sites to respond to design and other development management issues; 3. Ability to consider wider local market factors and how delivery on a number of sites might overall contribute to the delivery of the Council's preferred housing mix. Paragraph 5.67 recognises this, but policy text is rigid.	Castlewood Venture Partnerships; Bloor Homes South West Ltd; Woodhouse Developments(Amesbury)Ltd; Bloor Homes Ltd (Southern Region); Hills Homes; Bloor Homes South West Ltd.
<b>Policy 78 has not been sufficiently evidenced and it is too inflexible:</b> The policy does not allow for any flexibility, which may be needed due to site specific viability concerns and changing economic circumstances. Amend the policy to recognise that the required standards should be achieved where "possible, practical and viable".	St Phillips Land Ltd.
<b>Paragraph 1 Bullet Point 3 M4(2) and M4(3) Standards</b>	

Key issues raised (Policy 78 - Meeting Wiltshire's housing needs)	Respondent(s)
<p><b>The M4(2) and M4(3) requirements are not justified by evidence. M4(3) requirement should be determined on a case by case basis based on local needs and site specific circumstances:</b> Replace the M4(2) 100% requirement with a figure more aligned with the evidence base. The need for M4(3) standard housing is unclear and will be subject to change over the course of the Plan period. If adopted, include transitional arrangements to defer the introduction until developers have factored in the cost of space standards into future land acquisitions. Certain standards may be difficult to achieve on certain sites in terms of topography for instance and the ability to provide level step fee access in conversion of existing buildings.</p>	<p>Bloor Homes South West (Land to the North of A3102) Melksham; Bloor Homes South West; Bloor Homes (South West) Ltd; Woodhouse Developments (Amesbury) Ltd and Bloor Homes Ltd (Southern Region); Persimmon Homes (South Coast) &amp; Persimmon Homes (Wessex) Ltd; Gleeson Land( Planning Manager); Gleeson Land; Wadworth and Co Ltd; Backhouse Housing Ltd; Society of Merchant Venturers(SMV); Richborough Estates; Wainhomes(Severn Valley)Ltd.</p>
<p><b>The Local Housing Needs Assessment Volume 2 has inflated the future needs for adapted homes and older persons households requiring specialist housing. Reduce M4(2) and M4(3) provision:</b> The Local Housing Needs Assessment Vol 2 includes a section on Housing for People with Disabilities which draws heavily on England wide trends in its modelling which appear to be applied at a local authority level to calculate current need for M4(2) housing. Figure 50 projects a future need for adapted housing. However, this includes double counting errors. Not all the households will already have an adapted housing need by 2038 . It is acknowledged that not all households will choose to move into new build adapted housing, but report makes no further downward adjustments to reflect this. There isn't any assessment of what proportion of these households would be older person households requiring specialist housing as opposed to general needs market and affordable. The Local Housing Needs Assessment Vol 1 conclusion is a significant inflation of the likely requirement for such housing. Amend the M4(2) provision sought to "up to 20%". Amend M4(3) provision to "up to 5%". M4 2 wording does not state that this will be subject to site specific factors, something which the Housing Technical Optional Standards, NPPF Paragraph 8 highlights should be taken into account.</p>	<p>Robert Hitchens Ltd; Persimmon Homes (South Coast) &amp; Persimmon Homes (Wessex) Ltd; Bloor Homes (South West) Ltd.</p>
<p><b>There are a number of flaws in the calculation of the level of M4(2) and M4(3) needs in the Local Housing Needs Assessment. Reduce M4(2) and M4(3) provision:</b></p> <p>Reduce the assessment of need and then reduce by the calculation of the number of households who live in an existing property capable of adaptation. Where adaptation is feasible, it is considerably more likely that a household would seek to adapt their existing property than move. Until the Local Housing Needs Assessment has been updated it is not possible to provide an evidential basis upon which a robust and justified policy requirement for M4(2) compliant homes can be determined. Amend Policy 78 wording. (Wording suggested)</p>	<p>Waddeton Park Ltd; Barratt Homes Group; St Phillips Land Ltd.</p>

Key issues raised (Policy 78 - Meeting Wiltshire's housing needs)	Respondent(s)
<p><b>Local Housing Needs Assessment Fig 54 conclusion is a broad conclusion which cannot be applied to a Local Plan without a thorough understanding of the scope and reliance of the English Housing Survey and how it relates to the different HMAs in Wiltshire:</b> Normally LPAs only stipulate a percentage target for wheelchair users for affordable housing, because the RSLs know the people/families requiring wheelchair friendly properties. This can have implications for the size of properties, as wheelchair standard properties are generally at least 2 beds, to allow for carers/family to stay and assist. The Wiltshire Local Housing Needs assessment identifies the housing needs of Wiltshire and has highlighted a substantial increase in the older population in Wiltshire, consequently there is a need to provide housing with enhanced accessibility and adaptability (M4(2) and wheelchair accessible housing M4(3). As all new housing is required to meet M4(2) standards and be adaptable, there is no need for a developer to incur the additional costs of M4(3) alongside the myriad of other costs of a development and CIL/infrastructure Levy, for an unknown quantum of customers. The houses can be adapted as the needs of the resident's change. Policy 78 is not positively prepared, justified, effective or consistent with national policy. Amend Policy 78 to delete reference to a specific quantum of M4(3) housing.</p>	<p>Barratt Homes (Bristol) and David Wilson (South).</p>
<p><b>Delivering NDSS and M4(2) requirements isn't always possible due to site constraints or an alternative approach being merited:</b> e.g. increasing development density. Amend Policy 78 to recognise that there will be occasions when exemptions from the standard are justified.</p>	<p>The Stantonbury Building and Development Company.</p>
<p><b>Supports Policy 78 defined standards:</b> It significantly strengthens current Core Policy 45</p>	<p>Calne Without Parish Council.</p>
<p><b>Delete M4(2) requirements which will be superseded by building regulations. Introduce flexibility in the application of standards to reflect site specific characteristics. Differentiate between Part a and Partb of M4(3) standards. Consider the cost implications for M4(3a) and M4(3b).</b></p> <p>Requirements to meet Part M4(2) will be superseded by changes to Building Regulation. There is therefore no need for this element of the proposed Policy 78. PPG sets out some circumstances where it would be unreasonable to require M4(2) and M4(3) compliant dwellings, including flooding, typography and other circumstances. Flexibility is needed in the the application of these standards to reflect site specific characteristics, without which Policy 78 fails to comply with national policy and is not effective or justified. Amend the policy wording. [Home Builders Federation(HBF)] There is a need to differentiate between Part a and Part b of M4(3) standards which can only be required on affordable housing where the Council has nomination rights. Amend the policy to recognise this distinction. The Viability Assessment should also consider the cost implications resulting from any requirements for M4(3a) and M4(3b). M4(3b) being considerably more expensive.</p>	<p>Home Builders Federation(HBF); Terra Strategic Ltd.</p>
<p><b>Supports M4(2) and M4(3) requirements in principle. although increased delivery may affect viability and overall affordable housing delivery in Wiltshire.</b></p>	<p>South West Housing Association Planning Consortium.</p>

Key issues raised (Policy 78 - Meeting Wiltshire's housing needs)	Respondent(s)
Support M4(2) and M4(3) requirements, although the increased delivery of such properties may affect viability and overall affordable housing delivery in Wiltshire. It can also be challenging for developers to achieve level access on sites where there are topography issues. Agree that housing development design should be high quality.	
<p><b>The specific need for M4(3) is unclear and will be subject to change. Delete M4(30) requirement.</b></p> <p>Given that the specific need for M4(3) housing is unclear and will be subject to change over the course of the Plan period, determine the need for M4(3) on a case-by-case basis based on local needs at the time of development and site specific circumstances. Delete 7% requirement.</p>	Miller Homes.
<p><b>Inclusion of M4(3) Requirements:</b> There will be a need to provide dwellings that meet M4(3) requirements over the plan period. but there does not appear to be clear justification for the 7% figure. It will not always be possible to provide this level of provision, particularly on smaller sites, where development is already being constrained by other needs, such as meeting Biodiversity Net Gain and drainage attenuation. The policy is also not clear on whether the 7% means affordable and market housing or 7% overall. It would not be just for all M4(3) units on sites to be all affordable. It is considered more appropriate that the provision of affordable M4(3) units is based on an identified need in the area in which the development is located.</p>	The Stantonbury Building and Development Company.
<b>Policy 78 Paragraph 1 Bullet Point 2 NDSS Requirements</b>	
<p><b>Support NDSS requirements:</b> Support the need to meet Nationally Describes Space Standards (NDSS) requirements.</p>	Individuals x10.
<p><b>The NDSS requirements are not justified by evidence:</b> The evidence for NDSS is not present within the Local Housing Needs Assessment Vol 2 or anywhere else. NPPF 20 emphasises "where a need for internal space standards is identified, local planning authorities should provide justification....." It is not evident that the Council have demonstrated the need basis for seeking to impose NDSS. The viability evidence needs adjustment in respect of the floor areas assumed for some dwellings and should ensure that the larger floor area, whilst increasing build costs, do not necessarily translate into higher values per dwellings (See Attachment A). Inspector for North Hertfordshire Plan in 2019 stated for such policies to be found sound, they needed to be supported by the clear evidence of both need and viability.</p>	Robert Hitchens Ltd.
<p><b>NDSS requirement has not been sufficiently justified. The evidence has not been made available to stakeholders:</b> Publish a topic paper evidencing the need for NDSS and adaptable housing requirements in accordance with the NPPF and PPG to ensure the policy is found sound.</p>	St Phillips Land Ltd.

Key issues raised (Policy 78 - Meeting Wiltshire's housing needs)	Respondent(s)
<p><b>The evidence related to NDSS is minimal:</b> It is not set out in detail and does not provide a robust basis upon which to insist that all new development must meet the NDSS standards. There is no objection to the requirement provided that this is based on the criteria set out in the standards in respect of the defined level occupancy (for example. 2 beds, 3 person)</p>	<p>Persimmon Homes (South Coast) &amp; Persimmon Homes (Wessex) Ltd; Bloor Homes (South West) Ltd.</p>
<p><b>Does not support NDSS through policies in individual Local Plans:</b> It needs robust justifiable evidence to introduce NDSS, as any policy which seeks to apply the optional NDSS to all dwellings should only be done in accordance with NPPF which states "policies may also make use of the NDSS where the need for an internal space standard can be justified. There is a direct relationship between unit cost, cost per square metre, selling price sqm and affordability. Recognise that customers have different budgets and aspirations. An inflexible approach to NDSS for all new dwellings will impact on affordability and effect customer choice. Well-designed dwellings below NDSS can provide a good functional home. Smaller dwellings play a valuable role in meeting needs for both open market and affordable home ownership. An inflexible policy approach removes the most affordable homes and denies lower income households from being able to afford home ownership. Introducing NDSS for all dwellings may mean customers purchasing large homes in floorspace but with bedrooms less suited to their housing needs with the unintended consequences of potentially increasing overcrowding and reducing the quality of their living environment. Focus on good design and usable space to ensure that dwellings are fit for purpose rather than focussing on NDSS.</p>	<p>Home Builders Federation(HBF).</p>
<p><b>Policy 78 Paragraph 5.69 and Policy 78 Paragraph 2 Local Housing Needs Assessment</b></p>	
<p><b>Paragraph 5.69</b> - This paragraph highlights provision of lifetime homes, however this has not been translated into Policy 78. Lifetime and wheelchair home standards have been superseded by the optional M4 standards. The M4(2) standard is broadly equivalent. Lifetime should no longer be used. Delete Paragraph 5.69.</p>	<p>McCarthy Stone Retirement Lifestyles Ltd.</p>
<p><b>The evidence base is unable to support many of the requirements in Paragraph 2:</b> The LHNA Vol 2 does not assess need at sub local authority area. The Viability Assessment does not include any assessment applying a variable housing mix across the six value areas.</p> <p>Far too prescriptive given that the evidence base is unable to support many of the specific aspects sought. The Local Housing Needs Assessment Vol 2 does not assess affordable housing need at a sub local authority area, nor are market housing mix requirements based on demand analysed at a sub area level and nor is there any distinction providing an objectively assessed need for one- and two-bedroom apartments versus houses (or vice versa).</p>	<p>Robert Hitchens Ltd.</p>

Key issues raised (Policy 78 - Meeting Wiltshire's housing needs)	Respondent(s)
<p>Whilst the Viability Assessment suggests there to be six value areas, there is no assessment within it applying a variable housing mix across those areas. A reliable conclusion cannot be reached, and the current wording is unsound. Fig 41 presents conclusions on market housing mix requirements but does not provide any clear explanation on how the distribution of the LHN across the dwelling size mix is arrived at. Does make assumptions about older person households. Where these households occupy family housing, this housing will not become available for re-occupation by other families if these older person households do not move as assumed. This would result in a significantly larger proportion of larger family market homes being needed than projected. This scenario should be sensitivity tested and the Policy wording amended to reflect that there will be no inflexible application of the LHNA2 market mix</p>	
<p><b>Support in principle:</b> However, this element is too restrictive in seeking to apply the results of the LHNA when detailing housing mix and type on new site.</p> <p>Requiring the production of new evidence from either an updated Local Housing Needs Assessment or other credible evidence source seems an unreasonable expectation. A more suitable alternative would be for the policy to allow for variation to meet more local need to fit within the site context.</p>	<p>South West Housing Association Planning Consortium.</p>
<p><b>The approach is not justified and is not sound as it fails to account for developer preference and market flexibility; Use different house typologies on different sites to respond to sites and other development management issues;</b> The ability to consider wider local market factors and how different considerations will apply to a number of small to medium sites coming forward in close proximity and where each may need to provide variations of overall mix, Paragraph 5.67 recognises mix of housing will vary from site to site, but this is not recognised in the policy text which sets a rigid expectation for the Local Housing Needs Assessment in all cases. Policy 78 is not flexible and is unjustified and ineffective.</p>	<p>Individuals x10; Baker Estates Ltd.</p>
<p><b>It is not appropriate or justified to apply outputs of Local Housing Needs Assessment to each and every site which comes forward for development.</b></p> <p>It is the overall delivery of the housing needs which is important and a dogmatic adherence to a prescriptive mix on all sites will undermine this objective and lead to certain types of homes being delivered in the wrong location.</p>	<p>Wadworth and Co Ltd; Backhouse Housing Ltd.</p>
<p><b>Concerned that there is no reference to a recommended housing mix and that the Wiltshire Local Housing Needs Assessment will identify the housing. it fails to account for developer preference and market flexibility.</b></p>	<p>Castlewood Properties Ventures Ltd.</p>



Key issues raised (Policy 78 - Meeting Wiltshire's housing needs)	Respondent(s)
<p>This does not adequately account for developer preference or wider local market factors and how delivery on a number of sites might overall contribute to the delivery of the Council's preferred housing mix. This is not withstanding the need for different house typologies to be used on different sites to respond to design and other development management issues. The plan should provide a range and choice of sites and a need for the Council to consider whether higher levels of open market housing are required in order to secure the delivery of affordable housing and/or support economic growth.</p>	
<p><b>Concerned the Wiltshire Housing Needs Assessment is very limited in relation to the types of accommodation that are proposed at Salisbury District Hospital. Amend Policy 78 to refer to key workers and students.</b></p> <p>There is no reference to key worker housing and the only reference to student accommodation is contained in paragraph 6.66. There is very strong evidence for the provision of complementary on-site accommodation for hospital and teaching staff and students as set out in the Salisbury HEAT Project Vision and Masterplan 2023. Amend Policy 78 to include reference to the housing needs of key worker and students across Wiltshire.</p>	<p>Salisbury NHS Foundation Trust (SFT) and Salutem Developments.</p>
<p><b>Variation in housing mix:</b> Whilst there is a caveat which allows for a variation in the mix to be justified through the provision of new evidence on housing need, other characteristics are equally relevant such as the location and site context.</p>	<p>Wadworth and Co Ltd.</p>
<p><b>Policy 78 Paragraph 5.66 and Policy 78 Part 2 Older People</b></p>	
<p><b>Housing targets for retirement homes:</b> There should be a housing target for retirement homes and care homes, separate from traditional market housing. This target is best placed in Policy 2 but should be supported by Policy 78.</p>	<p>Mac Mic Group; Hill Residential Ltd; David Wilson Homes(Senior Planning Manager); Leda Properties Ltd; Paul Bowerman Discretionary Trust.</p>
<p><b>Amend Paragraph 3:</b> "Developers ..." Suggest adding "suitable accessible locations" to the end of this sentence to ensure sustainability.</p>	<p>Corsham Town Council.</p>
<p><b>There is no reference to Integrated Retirement Communities (IRCs). Amend Paragraph 5.66 and Policy 78.</b></p> <p>Whilst Paragraph 5.66 recognises that Wiltshire has an ageing population and Paragraph 5.67 recognises alternative facilities, there is no reference to Integrated Retirement Communities (IRCs) Amend the paragraph to make specific reference to IRCs as its likely over time to be the term most commonly used to describe all housing where care is available. To be a policy which truly assists with the delivery of housing for older people.</p>	<p>Classmaxi Limited and Lincoln College, Oxford.</p>

Key issues raised (Policy 78 - Meeting Wiltshire's housing needs)	Respondent(s)
it is essential that Policy 78 supports the provision of Integrated Retirement Communities. Policy 78 fails to support the development of such accommodation and will be ineffective in assisting the delivery of critical housing, given Wiltshire's impending increase in the population of older people. [Wording Suggested]	
<b>Cross reference to Policy 98 to help clarify what the policy means by housing being well designed.</b>	Hills Homes.
<b>Older persons requirement is vague, and it is not clear how the policy requirement is to be applied in decision making. Amend or delete.</b>	Wadworths and Co Ltd; Backhouse Housing Ltd.
<b>There is a lack of direction in addressing the need for increased provision for older people through planning policy, as there are currently no specific allocations in the urban areas or in the wider rural area:</b> There is an acknowledgement of the need for increased provision of housing for the older population, specifically in the form of independent living housing, assisted living accommodation, care homes and extra care facilities. There is a lack of direction in how this issue is to be addressed through planning policy, as there are currently no specific allocations both in the identified urban areas and the wider rural areas. The inclusion of housing allocations would benefit rural settlements by creating housing for older people to be able to remain in their existing communities. Suitable older person's accommodation within rural settlements would allow older people to remain within their communities and have access to housing which is specifically designed to meet their needs, whilst also allowing families or younger people to move into the larger houses vacated by the older population. An increase in care home provision would release pressure on the NHS, allowing elderly people to move out of hospitals and into care homes that supply an appropriate level of care facilities, whilst also providing sustainable jobs in the County. This would also benefit the Adult Care Services by enabling a more suitable level of care for the residents of the County.	Impact Planning Services Ltd; Mathurst Ltd; Cotswold Ecohomes Ltd; The Orders of St John Care Trust (Property & Development Director); Frontier Estates Ltd.
<b>Concerns that housing isn't exempt from the need to provide affordable housing:</b> 1. Capital cost of buying land and building care accommodation. 2. Ongoing cost of providing care within that accommodation. The policy approach will create a "bare minimum" approach to the provision of care facilities, the impact of which will be a significant reduction in the amount of amenity space for residents to enjoy and would be step back to old style age restricted retirement flats. By requiring schemes to provide affordable housing runs a real risk of meaning that the needs of older people simply won't be met in full. or in part. The primary reason for this is land value.	Opus Villages.
<b>Including specialist housing requirements within general needs housing developments is not viability tested in the evidence base:</b> Amend the wording to clarify that such provision will be supported, but it should not be imposed.	Robert Hitchens Ltd.
<b>Council housing:</b> Query whether the council is making enough provision for council housing accommodation.	Individuals x10.

Key issues raised (Policy 78 - Meeting Wiltshire's housing needs)	Respondent(s)
<b>Sheltered Accommodation provision:</b> There needs to be more housing including group houses for sheltered accommodation for those with special needs.	Individuals x10.
<b>Needs of an Ageing Population:</b> Policy 78 recognises that Salisbury attracts a larger proportion of elderly people and that future housing should meet the needs of an aging population.	Individuals x10.
<b>Policy 78 doesn't permit Large Villages to have care homes:</b> Rural residents may wish to remain part of their community and the availability of appropriate accommodation to allow them to do this at all life stages is important.	Melksham Town Council.
<b>Care homes in rural areas:</b> Policy 78 is not sufficiently clear that care homes and other specialist accommodation are limited to principal settlements and market towns due to the lack of evidence on infrastructure provision at other locations - concern about adding pressure to rural healthcare facilities.	Tisbury Parish Council.
<b>Vulnerable People</b>	
<b>Provision of homes for vulnerable people is not viability tested in the evidence base:</b> Modify the wording to clarify that such provision will be supported, but it should not be imposed.	Robert Hitchens Ltd.
<b>Clarify how the term vulnerable people is defined in the policy:</b> the types of accommodation required and what quantity of such dwellings are needed across Wiltshire. This requirement should be robust. in the same way that requiring M4(2), M4(3) and self-build housing is tested.	South West Housing Association Planning Consortium.
<b>Lacking in detail:</b> Specifically, in relation to housing for vulnerable people Does not provide a percentage or site threshold. There does not appear to be any references to vulnerable people in the Local Housing Needs Assessment, Policy 78 lacks clarity and is unsound.	Wadworth and Co Ltd; Backhouse Housing Ltd.

Table 5.97 [Policy 79 - First Homes exception sites] key issues

Key issues raised (Policy 79 - First Homes exception sites)	Respondent(s)
<b>Policy 79 Criteria Point 2</b>	
<p><b>This prescriptive test is additional to the proportionality tests included within the NPPG 2021, Written Ministerial Statement of NPPF 2023:</b> Seeking to restrict First Homes Exception Sites to collectively not exceed 1ha or 5% does not align with recent guidance. Delete Criteria 2. This very prescriptive test is additional to the proportionality tests included within the May 2021 First Homes National Planning Practice Guidance or the accompanying Written Ministerial Statement or the NPPF Sept 2023 approach on Entry Level Exception Sites. Seeking to restrict First Homes Exception Sites to collectively not exceed 1ha or 5% of an existing settlement over a Plan Period is not an approach that aligns with the most recent Government policy approach to providing entry level homes for First Homes Buyers. Delete from policy 79. The council have not provided any evidence of why this deviation from Government housing planning policy is necessary or demonstrated what the impact on overall Affordable Housing delivery numbers will be.</p>	Robert Hitchens Ltd.
<p><b>Object to Policy 79 because it is not effective:</b> It is unclear from this wording whether other First Homes development at a settlement includes any First Homes which will come forward as part of existing commitments or allocations, and over what period this threshold is assessed.</p>	Royal Wootton Bassett Town Council.
<b>Policy 79 Criteria Point 3</b>	
<p><b>The exclusion of sites that fall within a designated rural area is inconsistent with national policy and it is not justified by the evidence base.</b> The exclusion of sites within the Green Belt or an Area of Outstanding Natural Beauty is consistent with paragraph 72 and footnote 36 of the framework. The exclusion of sites that fall within a designated rural area is inconsistent with national policy and it is not justified by the evidence base. Large parts of Wiltshire are designated as rural areas. The framework specifically distinguishes between designated rural areas and other areas in Paragraph 64 in relation to affordable housing thresholds. However, no such distinction is drawn in NPPF Paragraph 72. The proposed approach in the Local Plan would only serve to limit affordable housing opportunities in the designated rural areas, contrary to the fundamental purpose of NPPF Paragraph 72.</p>	Hollins Strategic Land.
<p><b>Delete "designated rural areas" from Criterion 3:</b> It is recommended that the phrase 'designated rural areas' is removed from criterion (3). Suitable sites can be brought forward in rural areas in accordance with other relevant plan policies. Suitable exception sites can successfully be brought forward in rural areas provided the development is in full accordance with the other relevant plan policies. In addition, Policy 77 (Rural Exception Sites) allow exception sites to come forward in 'designated rural areas', so it is illogical to exclude first homes exception sites.</p>	Acorn Construction (Newbury) Ltd.

Key issues raised (Policy 79 - First Homes exception sites)	Respondent(s)
<b>Cross Subsidy</b>	
<p><b>Amend Policy 79 wording in line with NPPG:</b> Paragraph 2 introduces a requirement that where other forms of affordable housing or market home are proposed on a site as a form of cross subsidy to facilitate scheme economics, a local need must be proven. Current NPPF guidance does not refer to, or prohibit, the inclusion of market housing for cross subsidy purposes within First Homes Exception Sites, but it does refer to other forms of entry level Affordable Housing being able to be provided where these accord with the Affordable Housing definition at NPPF Annex 2. The only need test for the affordable housing element is for the need for homes from first time buyers or renters not being met across the authority as a whole. First Homes Guidance Paragraph 29 does refer to applicants being able to provide other forms of Affordable Housing within First Homes Exception Sites where a need for this demonstrated, but does not specify that this is need relating to the community in which the site is located as opposed to the wider local authority area. According to NPPF Paragraph 22, a community level of need does not have to be proven. For market housing, First Homes Guidance Paragraphs 27 and 28 do confirm that a small proportion of this can be included where necessary to ensure the overall viability of the site. There is no requirement for the need for market housing at either a local authority or community level to be demonstrated. Amend Policy 79 wording.</p>	Robert Hitchens Ltd.
<b>Policy 79 Viability Assessment</b>	
<p><b>Concerns raised in respect of the viability assessment for Policy 79. The inclusion of market housing is likely to be necessary:</b> The Viability Assessment Table 7-3 suggest all scenarios at 100% First Homes to be unviable, but with a 60% First Homes and 40% shared ownership split or a 70% First Homes and 30% open market tenure split the majority of sites tested will be viable. This is curious as the level of revenue secured from a First Homes at 70% is the same as the Viability assessment assumes for Shared ownership so whilst there are differences in terms of profit assumptions between the two it is questionable that including 40% of the units for shared ownership will render the scheme viable. The inclusion of market housing is likely to be necessary instead. There are various concerns raised in respect of the reliability of the Viability Assessment conclusions which call into question the viability of the cumulative policy cost burdens which are proposed to be placed upon development. As suggested by Viability assessment outcomes and having regard to the point made on the unlikely ability of shared ownership to be sufficient to render the sites viable, cross subsidy through the inclusion of market units. Looks to be necessary for such sites and should be included.</p>	Robert Hitchens Ltd.

Table 5.98 [Policy 80 - Self and custom build housing] key issues

Key issues raised (Policy 80 - Self and custom build housing)	Respondent(s)
<b>Provisions of Policy 80</b>	
Supports Policy 80	Calne Without Parish Council.
<b>Policy 80 Site Threshold and Percentage Requirement</b>	
<p><b>Supports the need for a variety of new housing, but Policy 80 should take a flexible rather than prescriptive approach:</b> Provide more evidence around need, viability and blanket requirement for sites of 20+ dwellings. The interaction of this policy with policies on affordable housing should also be clarified. It will impact on a large proportion of residential sites coming forward.</p>	Castlewood Venture Partnerships; Hills Homes; Bloor Homes South West Ltd.
<p><b>There is nothing in the legislation or in the NPPF which empowers Plan policies to specify the provision of self and custom build plots through the imposition of a planning obligation on sites or through off site contributions. Delete Policy 80:</b> 2016 amendments placed additional duties upon local authorities requiring development permissions for serviced plots of land to be granted to meet self-build register demand. It is the Councils responsibility, not that of a landowner or developer to ensure that sufficient permissions are given to meet demand. The legislation is not worded that it empowers local authorities to place restrictions on the use of land to deliver self-build units. National Planning Policy Guidance (NPPG) does not state that a requirement should be imposed as a blanket requirement for all sites or even something to be triggered by something as generic as a site size. It clarifies that on sites suitable for housing, landowners and developers can be encouraged rather than required to consider such provision where the landowner is interested. The strong emphasis is on the use of publicly owned land and delivery by local authorities through partnership with Housing Associations. There is nothing to suggest that policies should be prepared that place an obligation on landowners or developers to delivery self-build plots and to bear the cost and risk of marketing these plots. There is no evidence within the Local Housing Needs Assessment Vol 2 demonstrating a demand for self-build and custom build within large residential developments of estate type housing. Imposing a requirement is contrary to the NPPF. It is not sufficient to adjust the policy wording to say plots will be sought on a site by site basis, planning obligations through policy wording should be underpinned by known current and future need, not on the off chance of the need for a particular plot on a particular site happening to exist at the point in time an application is made, or becoming evident only during a lengthy year long marketing period. This provides no certainty to developers and landowners and exposes them to significantly potentially unnecessary additional costs and risks. No evidence has been provided that alternative strategies for addressing the self and custom build permission shortfall have been considered and tested. It provides no evidence that this policy will result in nil additional cost and risk burden on development. There are various concerns raised in respect of the reliability of VA</p>	Robert Hitchens Ltd.

Key issues raised (Policy 80 - Self and custom build housing)	Respondent(s)
<p>conclusions. Inspectors examining Local Plans elsewhere have noted these concerns e.g. Blaby District Dec 2018. East Devon, 2016; Cornwall, 2016. There is no indication that the above concerns are no longer relevant or valid under current Government policy.</p>	
<p><b>More than 20 dwellings is appropriate. The threshold could be better used to require an assessment of local need for self and custom build, allowing for an evidence based approach. The policy requirement to complete self-build plots within three years is unreasonable:</b> Amend Policy 80 to require practical completion within the plan period. Include a reference to the register and avoiding situations where there is clearly no need, perhaps because need has already been satisfied in a particular settlement or location, but meaning that 5% of the homes have to be held back for a set period for potentially unnecessary market testing. This has implications for the construction and viability of sites particularly small and medium sites where there is only one outlet or developer.</p>	Hills Homes.
<p><b>Additional evidence is required:</b> Policy 80 applies County wide and offers no flexibility to respond to local circumstances. Whilst there is evidence of a need for self-build plots in Wiltshire, this does not automatically mean there is demand in every location. Further evidence is needed. Produce a topic paper.</p>	St Phillips Land Ltd; L&Q Estates.
<p><b>5% Requirement is not justified:</b> Given the uncertainty regarding the current and future number of serious applicants for custom and self-build housing, as well as the location and size of plots required, the 5% requirement on sites of 20+ dwellings is not justified. Amend Policy 80 to delete the 5% requirement and instead require provision in line with the Councils latest evidence of local needs, which will need to be subject to ongoing monitoring.</p>	Miller Homes; Martin Grant Homes.
<p><b>Lack of evidence regarding 5% requirement:</b> There is insufficient evidence to demonstrate that 5% of housing on 20+ dwelling sites should be self and custom build plots. Paragraph 6.83 Local Housing Needs Assessment Vol 2 does not provide any justification. The Housing Delivery Paper does not reference self and custom build and there is no evidence on future self and custom build needs. Not all allocations and settlements would be suitable and the 5% target may threaten the delivery of housing required to address HMA and local needs. Not clear if this is for all new homes or exclusive of affordable homes. Policy 80 does not define what is a self and custom build home for the purposes of judging compliance and ongoing monitoring and whether it includes those defined in PPG or those seeking exemptions as self-builders under the Community Infrastructure Levy.</p>	Ludgershall Homes.
<p><b>To require new major sites to provide 5% dwellings has little or no regard to the preferences of those on the register. It is based on a formulaic approach. It requires plots to be marketed, but does not address circumstances where the marketing period has failed:</b> The burden is placed on major sites to provide plots as part of major development locations on settlement edges and it is difficult to reconcile how this approach responds appropriately to the preferences expressed by those on the register e.g. Old Sarum proposed allocations required to provide 22.5 plots, but there is no evidence to suggest that there is a specific demand</p>	Persimmon Homes (South Coast) Ltd & Persimmon Homes (Wessex) Ltd.

Key issues raised (Policy 80 - Self and custom build housing)	Respondent(s)
<p>for self and custom build plots at these locations. This is imposing policy burdens on major sites, with little or no regard to the suitability of these locations to meet the demand for plots. The strategy is based on a formulaic approach. Policy 80 does not include any provision to ensure the requirement is subject to demand being demonstrated. Policy 80 requires plots to be marketed, but it does not address circumstances where the marketing period has not attracted any interest. It suggests plots should be held in perpetuity which cannot be a justified approach. Delete the requirement for self-build plots on allocated sites and reword self and custom build within allocation policies to encourage the self-build provision. Reword Policy 80 to rephrase how the Council will consider and assess proposals for self and custom build rather than limiting the scope of this policy to major development sites.</p>	
<p><b>Unclear how the 5% requirement relates to the need and current provision in Wiltshire. A threshold of 20 is too small. Clarify if plots are not taken up they should revert back to the developer:</b> Unclear how 5% requirement relates to the need and current provision in Wiltshire. Include the information from the register in the evidence base and the threshold can reflect the evidence of need. It will constrain development opportunities coming forward in the most appropriate and sustainable locations for development within Wiltshire. The threshold also needs to be set against deliverability and viability considerations of bringing forward small medium sizes sites. A threshold of 20 is too small. Adopt a threshold of 50 or more. Clarify if plots are not taken up then they should revert to the developer so that the provision of much needed housing is not delayed. Any plots should not be subject to requirements for affordable housing. The policy meets a specific demand and legal requirement and should be separated from the overall number of dwellings target. An exception policy similar to Policy 79 would be more appropriate.</p>	<p>White Horse Country Club Ltd; Martin Grant Homes; Hannick Homes; Cooper Estates; Quidhampton Developments Ltd.</p>
<p><b>A blanket approach of 5% requirement for all sites is unlikely to meet the demand:</b> Whilst there appears to be a significant level of demand, the applicants on the register does not tell us how many are genuine, how many have the financial means to build a house of their own and how many would consider purchasing a plot within a larger housing development in order to build their own property. It is likely that many applicants are seeking an individual building plot or one on a small development. Wiltshire is a large area, and it is not clear from the evidence how the demand is distributed across the authority. Delete Policy 80.</p>	<p>Barratt Homes and Vistry; Waddeton Park Ltd; Barratt Homes Group.</p>
<p><b>Support 5% on sites of 20 or more dwellings in principle. On larger sites, this could equate to an entire phase of development. Provision of plots generally occurs on smaller sites. Amend Policy 80 to include additional flexibility:</b> On sites larger sites including Policy 7 Land South of Chippenham and East of Showell Farm this could equate to over 125 plots which may comprise an entire phase of development. On a national basis, the provision of self-build and custom plots generally occurs on sites of a smaller scale and where land values allow. Policy 80 is not sound. Amend Policy 80 to include additional flexibility.</p>	<p>Hallam Land Management.</p>



Key issues raised (Policy 80 - Self and custom build housing)	Respondent(s)
<p><b>Object to blanket requirement of 5% on sites of 20+ homes:</b> Policy 80 is not justified or effective. The provision of self and custom build within major developments can be problematic. Instead, replace with an approach which seeks to encourage self and custom build in certain locations and/or circumstances.</p>	<p>Richborough; Richborough Estates; Wyatt Homes; Society of Merchant Venturers; Bellway Homes; Bellway Homes.</p>
<p><b>The requirement for self-build is challenging to bring forward. Provide evidence how the 20+ threshold and 5% requirement has been arrived at and how it will meet demand for self and custom build:</b> Other regions in England have raised issues where there is self-build policy and plots are rarely taken and which creates challenges when the wider site works are already complete. P 20+ threshold is considered a low threshold with self and custom build typically being more suited to much larger sites. Unclear if the 5% requirement will continue to be implemented in the event that the need for self and custom build has been met.</p>	<p>South West Housing Association Planning Consortium (SWHAPC).</p>
<p><b>Policy 80 is not sound. Requiring major developments to provide self-build plots is inappropriate. Policies should encourage self and custom build by setting out where it will be supported in principle. Councils can play a key role in facilitating the provision of land as set out in PPG:</b> The Council could use its own land and allocate specific sites for self and custom build following discussion and negotiation with landowners. It is unlikely that the provision of plots on new housing developments can be co-ordinated with the development of the wider site. There are often multiple contractors and machinery onsite, and it is difficult to envisage the development of single plots by individuals operating alongside this construction activity. Ensure that where plots are provided, they are delivered and do not remain unsold. There is a risk of plots remaining permanently vacant effectively removing these undeveloped plots from the Councils Housing Land Supply. Consider the application of a non-implementation rate.</p>	<p>House Builders Federation (HBF).</p>
<p><b>Policy 80 isn't justified and alongside biodiversity net gain, affordable housing and betterment in greenfield run off rates would provide another unnecessary burden on development and potentially makes schemes unviable and undeliverable:</b> 5% requirement would deliver a large number of self-build plots and it is unclear that there is demand for such a number without the available evidence. It would be undeliverable on many sites due to site constraints, the types of dwellings proposed, and many sites would be undesirable to self-builders.</p>	<p>The Stantonbury Building and Development Company.</p>
<p><b>Policy 80 is unjustified due to the lack of consideration of sites where providing self and custom build is unachievable and the blanket target of 5% of dwellings on sites of 20+ dwellings. Amend Policy 80 to include a clause for sites where on the basis of specific site characteristics and/or viability, the provision of plots for self and custom build housing is unachievable:</b> Some carry distinct viability challenges on the basis of their unique costing model. The current wording is over prescriptive. Provide more evidence to ensure that self and custom build plots are provided in the locations where there is genuine demand.</p>	<p>Wadworth and Co Ltd; Backhouse Housing Ltd.</p>

Key issues raised (Policy 80 - Self and custom build housing)	Respondent(s)
<p><b>Policy 80 and the plan is unsound:</b> Proposals are inadequate in respect of self and custom build including a failure to fully establish the demand for custom and self-built homes - contrary to the NPPF. A failure to fully establish and duty with the plan period as established by the Right to Build Legislation (so far as the current data allows). A failure to establish an appropriate range of policies that meet the requirements for custom and self-built homes. A failure within the existing policy to establish that the plots that are set aside for custom and self-build will ultimately be used to deliver custom and self-build homes.</p>	NaCSBA.
<p><b>Support need for a variety of new housing, but Policy 80 should take a flexible rather than prescriptive approach:</b> Provide further evidence on need, viability and applying across all sites of 20+ dwellings. Clarify the interaction with affordable housing policies. These policies are often not effective at meeting identified needs or demands and there is limited uptake of the plots offered. There are also health and safety implications, in addition to uncertainties created in respect of site construction and build out and complexity which can act to slow delivery of housing overall. Amend Policy 80 to allocated sites if there are specific needs in specific locations.</p>	Woodhouse Developments(Amesbury) Ltd and Bloor Homes Ltd (Southern Region).
<p><b>Policy 80 is not justified. Delete Policy 80:</b> The Plan refers to the Councils Self and Custom Build Register that indicates that there is a demand for self and custom build plots. However, this does not form part of the evidence in support of the plan.</p>	Gleeson Land (Planning Manager); Gleeson Land.
<p><b>Supports Policy 80 to help ensure that the need is met, but the policy should be more explicit that it is not just in these circumstances of 20+ dwellings that delivery of self and custom build will be supported and currently is not justified or effective:</b> The Amesbury Local Housing Needs Assessment being prepared in support of the neighbourhood plan is looking into this.</p>	Amesbury Town Council.
<p><b>Policy 80 isn't inappropriate, but plots are either not taken up on larger sites because self-builders are not looking for a plot on a housing estate, or they are simply delivered by the developers as custom builds, so the contribution they give to the supply of plots is narrow:</b> Amend Policy 80 to be more ambitious and for proposals of 10 or less dwellings in locations that are well located to settlements. This would provide a more diverse supply of sites to help meet the demand identified on the self and custom build register.</p>	Urchfont LVA LLP; Dilton Marsh LVA LLP; Land Values Alliances LLP (LVA).
<p><b>Housing for older people is specialist in nature, often delivered on brownfield sites and tends to be built to high density on small or medium sites:</b> There is no room for self-build plots on site and it is impractical to deliver them. Amend Policy 80. Reconsider the threshold and apply the requirement to units over a certain area e.g.1 hectare.</p>	McCarthy Stone Retirement Lifestyles Ltd.
<p><b>Self Build and Custom Build Housing Register</b></p>	

Key issues raised (Policy 80 - Self and custom build housing)	Respondent(s)
<p><b>The Local Housing Needs Assessment Vol 2 has overestimated the demand. The number of applicants on the register should be treated with caution. Amend Policy 80:</b> Local Housing Needs Assessment Vol 2 Figure 58 shows applicants joining the register and discounts data since October 2021 on the basis that the sudden increase was the result of a social medial campaign. It is not clear why Fig 58 refers to applicants joining the register and differs from data presented on the Councils webpage refers to applicants on the register, thus suggesting that the total number on the register is considerably higher than presented on the Councils webpage. The LHNA2 has overestimated the demand. The number of applicants on the register should be treated with caution as there is no controlled method of determining the seriousness of each applicant. This should then inform policy requirements on major site to provide self and custom build. Amend Policy 80 to encourage the provision of self and custom build plots where this is clear evidence of demand for this provision and not to limit the scope of the policy to major sites.</p>	<p>Bloor Homes (South West) Ltd; St Phillips Land Ltd.</p>
<p><b>Amend Policy 80 to identify opportunities for self build standalone homes:</b> Would like to build own home on a couple of acres, in the corner of a farm and land sold for a reasonable price.</p>	<p>Individual x1.</p>
<p><b>Marketing</b></p>	
<p><b>Support self and custom build in principle:</b> It is unclear what happens after the 12-month period if marketing has been unsuccessful. Amend Policy 80 to allow the owner should to sell the self and custom build plot on the open market as conventional residential development.</p>	<p>Bloor Homes South West (Land to the North of A3102, Melksham); Bloor Homes South West; Wainhomes (Severn Valley) Ltd; Richborough; Waddeton Park Ltd; Richborough Estates; Miller Homes; Society of Merchant Venturers (SMV).</p>
<p><b>3-year requirement for completion:</b> In ensuring the plan is responsive to changing economic circumstances and personal circumstances, the 3-year requirement for completion is unreasonable and unenforceable. The mechanism to require completion by an individual is not clear. Delete this requirement.</p>	<p>White Horse Country Club Ltd; Martin Grant Homes; Hannick Homes; Cooper Estates; Quidhampton Development Ltd.</p>
<p><b>If the policy is retained, include a mechanism through which any approved self and custom plots can be returned to the developer and delivered as market dwellings following a 12-month marketing period:</b> Tighten up the policy work to ensure this is effective and can be clearly interpreted by the decision maker when considering development proposals. <i>[Alternative policy wording suggested by representors].</i></p>	<p>Gleeson Land (Planning Manager); Barratt Homes and Vistry; Barratt Homes Group; Gleeson Land.</p>
<p><b>If the policy remains it needs to be clear where plots are not sold after 12 months they were revert back to the developer. Amend Policy 80:</b> Plots should not be left empty to the detriment of neighbouring properties or the whole development. The timescale for reverting back to the housebuilder should be as short as possible.</p>	<p>Home Builder Federation (HBF).</p>

Key issues raised (Policy 80 - Self and custom build housing)	Respondent(s)
<b>Concerns regarding monitoring:</b> Has concerns about whether Policy 80 is strong enough about where sites are advertised, to whom and how monitoring occurs.	Individuals x10.
<b>Policy 80 does not define how viability will be considered and what consequences are triggered should plots not be acquired within the 12 month marketing period:</b> Amend Policy 80. <i>[Alternative policy wording suggested by representors].</i>	Ludgershall Homes.
<b>Community Led Housing</b>	
<b>Support Policy 80, but would like support for community led development to be supported through such schemes as community land trusts:</b> CLTs provide urgently needed social rented housing and shared ownership housing in perpetuity. CLTs can also use windfall sites on previously developed land.	Individuals x10; Wiltshire Community Land Trust.
<b>Climate and Employment</b>	
<b>Policy 80 is unsound and not legally compliant:</b> All development contributes to significant carbon emissions. Requirements and impacts are not specifically mentioned as being applicable to this policy.	Wiltshire Climate Alliance.
<b>Lack of consideration for self-build:</b> No consideration has been given to increasing local employment through self-build and a higher proportion of self-builds being sustainable & net zero housing compared to developer standards.	Individuals x10.
<b>Neighbourhood Plans</b>	
Will review Neighbourhood Plan policies to align with Local Plan policies.	Melksham Town Council.
<b>Affordable Housing</b>	
<b>Amend Policy 80 to include affordable housing as a tenure:</b> The inclusion of affordable self and custom build dwellings offers another route towards affordable housing and helps to diversity the housing market and increase consumer choice.	South West Housing Association Planning Consortium (SWHAPC).

**Table 5.99 [Policy 81 - Community Facilities] key issues**

Key issues raised (Policy 81 - Community Facilities)	Respondent(s)
<b>Support</b>	
<b>Support:</b> The policy is generally supported/sound.	Sport England; Chippenham Town Council; Calne Without Parish Council; Richborough; Individuals x10.
<b>Development of new community facilities</b>	
<b>Broader definition of community facilities required:</b> Supporting paragraph 5.82 should expand the list of community facilities to include: ‘open space’ to align with NPPF paragraph 93; children’s play areas’, which is referenced as a community facility need in the IDP; and sustainable transport links. [Policy wording amendment proposed by the representor]	Miller Homes.
<b>Need for a Built Facilities Strategy:</b> With regard to proposals for new sports buildings, it is advised that a built facilities strategy is commissioned to ensure there are sufficient facilities for both new and existing residents, similar to the playing pitch strategy. This would give a sound evidence base for seeking contributions from developers.	Sport England.
<b>Flexibility required regarding locations of community facilities:</b> The policy is overly prescriptive regarding location and criteria for community facilities. NPPF para 93a states community facilities can ‘enhance the sustainability of communities and residential environments’; para 93c recommends ‘an integrated approach to considering the location of housing, economic uses and community facilities and services’; and the IDP states ‘there is an ongoing requirement to provide community facilities across Wiltshire’. Community facilities should therefore be provided where needed, not necessarily ‘within and adjoining settlement boundaries and at Small Villages’. [Policy wording amendment proposed by the representor]	Miller Homes.
<b>Viability of new facilities:</b> Concern that the policy does not contain a clause requiring applicants to demonstrate a need for the new community facility which may enable competing facilities, overprovision and unviability.	Melksham Town Council.
<b>Community support for new facilities:</b> The policy should include a requirement to demonstrate community support for the new community facility.	Melksham Town Council.
<b>Redevelopment of community facilities</b>	
<b>Flexibility to enable redevelopment of healthcare related property:</b> The Redevelopment of Community Facilities part of the policy requires flexibility acknowledging that the NHS is required to ensure land and property is used efficiently with regard to the disposal of redundant or unsuitable sites. Requiring NHS disposal sites to	Bath and North East Somerset; Swindon And Wiltshire NHS Integrated Care Board.

Key issues raised (Policy 81 - Community Facilities)	Respondent(s)
<p>explore potential for alternative community uses and/or to retain a substantial proportion of community facility provision will add unjustified delay to vital reinvestment in facilities and services for the community. The Local Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land. [Policy wording amendment proposed by the representor]</p>	
<p><b>Duration of marketing exercise:</b> Criteria i. of this section sets a marketing period of 6 months – this should be amended to 18 months; and any plan should be agreed with Wiltshire Council; Criteria i. sets a marketing period of 6 months – this should be amended to 12 months to allow local communities sufficient time to respond and generate funds to purchase local assets (e.g. village pubs).</p>	<p>Sport England; Individuals x10.</p>
<p><b>Leisure centres</b></p>	
<p><b>Renovation of existing community facilities:</b> Most of the larger towns have leisure centres that require renovation and libraries that perform multiple roles as community hubs, warm spaces and internet hubs. The upgrade of existing facilities should be prioritised.</p>	<p>Individuals x10.</p>
<p><b>Lime Kiln leisure centre:</b> Lime Kiln leisure centre in Royal Wootton Bassett has not been maintained as well as other Wiltshire Council Leisure Centres, and it needs investment.</p>	<p>Individuals x10.</p>

Table 5.100 [Policy 82 - Housing in the Countryside] key issues

Key issues raised (Policy 82 - Housing in the Countryside)	Respondent(s)
<b>General support/objection</b>	
<b>Support:</b> The policy is generally supported/sound.	Melksham Town Council.
<b>Policy overly restrictive:</b> The policy does not align with NPPF para 79 and is too restrictive given the predominant rural context of the county; The policy is too restrictive as it does not allow for site-specific circumstances which justify development coming forward, such as sites adjoining existing built areas and/or sites which benefit from sustainable travel connections to larger settlements.	Cotswold Ecohomes; Cooper Estates; Castlewood Ventures; Hills Homes; Mr and Mrs Self.
<b>Contribution of rural housing to meeting Wiltshire's housing needs:</b> The policy should be made more positive towards opportunities for sustainable housing development in the countryside as a means to address meeting Wiltshire's needs across the plan period.	Cooper Estates.
<b>Lack of monitoring mechanisms:</b> Concern that there are no monitoring or review mechanisms within the Local Plan, so there are no appropriate action(s) within this policy which can be triggered in certain circumstances to ensure a sufficient supply of housing over the plan period.	Richborough.
<b>Functional and financial evidence:</b> The requirement for functional and financial evidence of need is overly onerous and not required by national policy, which set a requirement for evidence of an essential need.	Mr Simon Chambers.
<b>Sustainable transport</b>	
<b>Access to sustainable transport in rural areas:</b> With regard to the final paragraph of the policy the context of NPPF para 105 should be noted. Opportunity to maximise sustainable transport solutions varies between urban and rural areas - access to sustainable modes of transport should not be a matter that hinders proportionate, small-scale residential development that could increase sustainability in rural areas more generally.	The Badminton Estate.
<b>Climate change</b>	
<b>Cross reference to climate change policies:</b> In order to meet legal obligations to address climate change, the policy should be amended to cross reference to policies that seek to address climate change and biodiversity loss. [Policy wording amendment proposed by the representor]	Wiltshire Climate Alliance.
<b>Previously developed land/farm diversification</b>	
<b>Brownfield opportunities in the countryside:</b> The policy is too limited as it does not account for opportunities for the redevelopment of previously developed sites in the countryside.	DIO; Hills Homes; Acorn Construction.

Key issues raised (Policy 82 - Housing in the Countryside)	Respondent(s)
<b>Approach to non-residential development in the countryside:</b> The policy only refers to housing development in the countryside - there is a lack of clarity on the approach to farm diversification for uses other than residential, as is required by NPPF para 84.	Conlon Ltd; Ken Saunders.
<b>Landscape</b>	
<b>Settlement identity:</b> The policy wording fails to adequately protect settlement identities by enabling development that could erode landscape gaps. [Policy wording amendment proposed by the representor]	CPRE.
<b>National Landscapes:</b> Footnote 37 is supported, but it is advised that the policy be strengthened for National Landscape locations in relation to the meaningful improvements to the appearance and function of the building in the context of the nationally designated landscape and the immediate setting.	Cranborne Chase Area of Outstanding Natural Beauty.
<b>Subdivision, infill and replacement dwellings</b>	
<b>Subdivision of dwellings:</b> Wiltshire Council have refused permission for subdivision of dwellings citing NPPF para 84 and that the subject property is not in an isolated location and therefore not compliant. The correct interpretation of how Criteria 4 of the policy should be clarified – i.e. if only in isolated locations.	LD&PC Ltd.
<b>Infill/replacement dwellings:</b> An additional criterion should be added to support infill development or replacement dwellings in settlements.	Calne Without Parish Council.



Table 5.101 [Policy 83 - Health and Wellbeing] Key Issues

Key issues raised (Policy 83 - Health and Wellbeing)	Respondent(s)
<b>Support Policy 83</b>	
<b>Availability of public open space is welcomed:</b> Natural England welcomes the recognition that the availability of public open space plays a key role in health and wellbeing.	Natural England.
<b>Policy 83 is supported:</b> The Town Council supports Policy 83 on Health and Wellbeing, in particular the requirement for a Health Impact Assessment to be submitted on large schemes.	Chippenham Town Council.
<b>The policy is welcomed:</b> The addition of this policy is welcomed, especially the addition of the healthy food environment.	Sustainable Calne.
<b>Support for Policy 83 was expressed:</b> Conditional support for all/ part of Policy 83 was expressed by a number of representors.	Calne Without Parish Council; Castlewood Properties Ventures Ltd; L&Q Estates; White Horse Country Club Ltd; Martin Grant Homes; Hannick Homes; Natural England.
<b>The approach is consistent with national policy:</b> We support the approach taken in Policy 83 which states that proposals should demonstrate that development will contribute positively to health and wellbeing by enabling and promoting healthy lifestyles and minimising any negative health and wellbeing impacts. This approach is consistent with national policy which sets out that planning policies and decisions should aim to achieve healthy, inclusive, and safe spaces which enable and support healthy lifestyles especially where this would address identified local health and well - being needs. The HEAT project will be fundamental in supporting the health and well - being of Wiltshire's residents over the emerging plan period and beyond.	Salisbury NHS Foundation Trust and Salutem Developments.
<b>We support that the Local Plan includes policies for health and wellbeing:</b> We support that the Local Plan includes policies for health and wellbeing to promote healthy lifestyles alongside facilitating improvements to health infrastructure. We support the requirement in Policy 83 for the HIA on significant residential developments of 150 units or more. We request when developing any future guidance on detailed HIA requirements, the council engage the NHS in the process as early as possible.	NHS Property Services.
<b>Objection to Policy 83</b>	
<b>There are concerns regarding the lack of detail:</b> There are concerns regarding the lack of detail as to how this policy is to be implemented as a basis for future decision making, this will result in delays to the decision - making process and potentially result in disproportionate burdens on applicants as they prepare HIA in support of development proposals.	Bloor Homes South West; Persimmon Homes South Coast Ltd; Persimmon Homes Wessex Ltd.

Key issues raised (Policy 83 - Health and Wellbeing)	Respondent(s)
<p><b>Policy 83 is unnecessary:</b> The policy is unnecessary and provides an unjustified burden on applicants to provide further information for a planning application which would already be covered in other documents (such as Design and Access Statement, Transport Statement, Landscape Statement and Ecology Statement).</p>	<p>The Stantonbury Building and Development Company.</p>
<p><b>Calne's housing allocation:</b> Will it apply to houses built on the allocated land in this review for Calne if permission is granted before the plan is adopted. This could negate the benefits of the policy for almost all of Calne's housing allocation.</p>	<p>Sustainable Calne.</p>
<p><b>Infrastructure</b></p>	
<p><b>Green and blue infrastructure:</b> The current wording includes the promotion of access to green and blue infrastructure under "Healthy food environment". In our view this is confusing and downplays the importance to health and wellbeing of the provision of public open space in its own right, including access to high quality blue and green infrastructure. Through the plan and Policy 83 there is also a tendency only to link improving mental and physical health to sport and physical activities, which misses the role of nature. We recommend greater acknowledgment is given of nature's role in healthy lifestyles and environments and how improving access to nature reduces health inequalities.</p>	<p>Natural England.</p>
<p><b>Current infrastructure needs must be delivered before new developments are considered:</b> The policy seems to focus mainly on physical wellbeing with no clear emphasis on mental wellbeing. With no guaranteed essential infrastructure to address NHS constraints, traffic congestion or education constraints, the increased pressure on the existing communities affected by the draft Local Plan does not improve the health and wellbeing of communities or the population of the new developments. Current infrastructure needs must be delivered before new developments are considered.</p>	<p>Lydiard Tregoze Parish Council.</p>
<p><b>The policy should set out minimum standards for outdoor space in new care homes:</b> Melksham is being identified as a focussed area of growth for developers, when that development if approved will deliver more care beds than the area needs and will represent a significant proportion of the total care beds required across the county. We believe the Local Plan should set out a clear policy for care bed provision across the county so that provision can be delivered where it is needed and that all locals' areas are properly serviced. The policy should also set out minimum standards for outdoor space in new care homes. This standard should provide sufficient outdoor space for residents to enjoy such spaces to improve their health and wellbeing.</p>	<p>Community Action Whitley and Shaw.</p>
<p><b>Redevelopment will increase the amount of open space in and around the site:</b> In terms of health infrastructure, the proposed development will deliver a wide range of improved facilities, including a new day surgery unit, maternity facilities with neonatal intensive care suite, cancer unit, intermediate care ward, dementia care unit and rehabilitation provision. This will ensure that the Salisbury Foundation Trust is well equipped to serve the changing health needs of the local population. The redevelopment and expansion of Salisbury Hospital</p>	<p>Salisbury NHS Foundation Trust and Salutem Developments.</p>

Key issues raised (Policy 83 - Health and Wellbeing)	Respondent(s)
to the east will increase the amount of open space in and around the site, connecting these to the local network of green infrastructure, recognising the physical and mental health benefits associated with the provision of open spaces and recreation opportunities.	
<b>Healthy Food Environment</b>	
<b>The section on Healthy food environments needs to go further:</b> Whilst welcoming this policy, the section on Healthy food environment needs to go further as otherwise it will just be land for community gardens, orchards, or allotments. There needs to be s106 contributions for fencing, a car park for deliveries, a water supply, details of who will manage them otherwise they are meaningless.	Melksham Without Parish Council.
<b>This element of the policy is unjustified and ineffective:</b> The second part of the policy (on healthy food) seems to appear from nowhere. There is no mention of the healthy food element of the policy in the surrounding text and no further information is provided on this matter. HBF are unclear how a developer would demonstrate compliance with this policy. Therefore, this element of the policy is both unjustified and ineffective and as such should be deleted or at the very least clarified. If the intention is for this to be a matter considered in the HIA this could be referred to in the policy, but HFB suggest that should not be singled out against other HIA considerations.	Home Builders Federation.
<b>The relationship of this requirement and the HIA is not adequately explained:</b> The second part of policy 83 refers to 'Healthy food environment'. The relationship of this requirement and the HIA is not adequately explained, and no further information is presented to provide clarity as to how achieving a 'healthy food environment' will be measured and what is expected from developments to adhere to this provision of policy 83.	Persimmon Homes South Coast Ltd; Persimmon Homes Wessex Ltd.
<b>Support for Policy 83's ambition to enhance local food growing opportunities:</b> We support Policy 83's ambition to enhance local food growing opportunities by requiring new residential developments to either have access to, or be accessible to green and blue infrastructure, including community gardens, community orchards and/ or allotments. However, to ensure the policy is justified and effective, further detail should be provided within the policy and/ or the supporting text to explain how this will be secured in practice.	Richborough.
<b>Health Impact Assessment</b>	
<b>Methodologies for HIAs are widely available:</b> Methodologies for HIAs are widely available and are used by LAs and Health Authorities and so can be implemented with immediate effect.	Wiltshire Climate Alliance.
<b>HIAs should be required for developments of 50 or over:</b> HIAs should be required for developments of 50 or over dwellings. The HIA should include a section that addresses how the building construction will provide acceptable comfort standards and avoid health risks through poor insulation and ventilation.	Wiltshire Climate Alliance.

Key issues raised (Policy 83 - Health and Wellbeing)	Respondent(s)
<p><b>The threshold should not be based on site area only:</b> On the basis that the requirement of a Health Impact Assessment is predicted on schemes proposing a significant level of housing, the threshold should reflect this and not be based on site area only.</p>	<p>White Horse Country Club Ltd; Martin Grant Homes; Hannick Homes.</p>
<p><b>The threshold for providing a HIA needs to be reviewed and increased:</b> It is recommended that the threshold for providing a HIA is reviewed and increased. Further clarity should also be set out regarding the type of HIA required.</p>	<p>Miller Homes.</p>
<p><b>How the threshold has been determined is not explained:</b> Residential development of 150 homes or more, or where the site is 5ha are required through Policy 83 to prepare a HIA, how this threshold has been determined is not explained within any supporting evidence.</p>	<p>Bloor Homes Southwest Ltd.</p>
<p><b>Further justification is necessary:</b> Further justification is necessary to demonstrate how the development size thresholds set out within policy 83 have been derived.</p>	<p>Bloor Homes Southwest Ltd; Persimmon Homes South Coast Ltd; Persimmon Homes Wessex Ltd.</p>
<p><b>HIAs should apply to developments of 50 or over houses:</b> These health risks could affect all new and retrofit houses and should be applied as widely as possible, but to be effective we argue that HIAs should apply to developments of 50 or over houses and should be subject to post - construction checks, possibly through building inspection procedures.</p>	<p>Wiltshire Climate Alliance.</p>
<p><b>The threshold of 5ha is unsound:</b> Whilst we recognise the benefit of providing a Health Impact Assessment as part of a planning application to set out how such principles are reflected in a proposal; it is considered that the application of a 5ha threshold is unsound. The requirement for a Health Impact Assessment to be undertaken on developments of 150 homes or more is supported however, not on the basis of site area alone. Larger sites may come forward with significant areas of green infrastructure for a number of reasons for example if seeking to achieve biodiversity net gain on site or to meet other infrastructure requirements on site (such as land for a school).</p>	<p>White Horse Country Club Ltd; Martin Grant Homes; Hannick Homes.</p>
<p><b>Further justification is required:</b> Policy 83 and the supporting text and the accompanying Local Plan Review evidence base do not include any evidence or justification for the specific HIA thresholds set out. It is considered that the proposed thresholds for the need to undertake a health impact assessment are too low for development in Wiltshire. Instead, health impact assessments should relate to strategic development, generally where Environmental Impact Assessments are also required or for Major Infrastructure Projects. The policy should also be more explicit in confirming the type of HIA required for the scale of development proposed.</p>	<p>Miller Homes; Society of Merchant Venturers.</p>

Key issues raised (Policy 83 - Health and Wellbeing)	Respondent(s)
<p><b>A template HIA to be provided:</b> The SWHAPC questions if the Council will be providing a template HIA to work alongside the policy. It is noted at paragraph 5.90 that guidance may be prepared to provide advice on what should be included in the HIA. The SWHAPC encourages the production of this guidance, including a template HIA.</p>	<p>Southwest Housing Association Planning Consortium.</p>
<p><b>A lack of specific detail as to how HIA will be assessed:</b> There is a lack of specific detail as to how HIA will be assessed and the criteria against which their appropriateness will be determined. It is not clear whether HIA will need to be informed by consultation with the Council and with specific consultees such as local healthcare providers. It is also not clear whether there is a sliding scale of information and assessments needed based on the scale of development to adequately assess the health and wellbeing impacts from development proposals.</p>	<p>Bloor Homes Southwest Ltd; Persimmon Homes South Coast Ltd; Persimmon Homes Wessex Ltd.</p>
<p><b>Wiltshire Design Guide:</b> Within the recently consulted Wiltshire Design Guide it explains that Public Health England in 'Spatial Planning for Health' provides an evidence based resource for planning and healthier places, yet it is not clear within Policy 83 whether this forms the basis upon which HIAs should be prepared.</p>	<p>Bloor Homes Southwest Ltd; Persimmon Homes South Coast Ltd; Persimmon Homes Wessex Ltd.</p>
<p><b>There is a lack of detail on the type of HIA that may be required:</b> The drafted policy lacks sufficient detail on the type of HIA that may be required; how outcomes are determined; and the means for monitoring impacts. While paragraph 5.90 references "guidance may be prepared" the Local Plan must be capable of being soundly interpreted and the absence of any basis for applicants to undertake and the LPA to assess, HIA must be corrected at the earliest opportunity.</p>	<p>Ludgershall Homes.</p>
<p><b>Insulation standards should be factored into all Health Impact Assessments:</b> The improved insulation standards for new build or retrofit housing required elsewhere in this plan require standards that prevent ill - health through risks of damp, condensation, and mould due to fuel poverty, poor design and construction and inadequate ventilation. This should be factored into any Health Impact Assessment.</p>	<p>Wiltshire Climate Alliance.</p>
<p><b>Policy 83 is inconsistent with the requirements of paragraph 16b of the NPPF:</b> In respect of residential development any potential impact on health and well - being will be as a result of the population. It is therefore logical for one of the triggers for HIA to be a specific dwelling number. However, the same is not true of a site area when considered in isolation. For example, the population of a development of 100 dwellings on a 4ha site would be no different to the population of a development of 100 dwellings on a site of more than 5ha. As such the requirement for the latter proposal to be subject to HIA is arbitrary and not justified. Policy 83 is therefore, inconsistent with the requirements of paragraph 16b of the NPPF and is unsound.</p>	<p>Gleeson Land.</p>
<p><b>There is a lack of specific details within the policy:</b> The supporting text to Policy 83 provides some guidance as to what should be expected of new development to improve health and wellbeing. Within the Local Plan the health and wellbeing of communities is also considered within policy 93. It is also noted that it is set out within</p>	<p>Bloor Homes South West Ltd; Persimmon Homes South Coast Ltd; Persimmon Homes Wessex Ltd.</p>

Key issues raised (Policy 83 - Health and Wellbeing)	Respondent(s)
<p>the Sustainability Appraisal that the introduction of health considerations in decision - making will result in significant positive benefits in reducing deprivation and promote more inclusive local communities with better services and facilities. There are therefore a range of matters which are likely to inform the scope and content on HIA however, the lack of specific details within the policy raises concerns as to the effectiveness of this policy. It is also noted that 'guidance may be prepared to provide advice on what should be included in the HIA to demonstrate that any health - related impacts have been fully considered'. Such guidance should be produced in support of the policy and the absence of this 'guidance' means it is difficult to determine both the effectiveness of this policy in terms of ensuring development contributes positively to health and wellbeing and the justification for this being required on the scales of development set out in the policy wording.</p>	
<p><b>Policy wording amendments:</b> Amendments to wording of policy relating to requirement for Health Impact Assessment.</p>	<p>Gleeson Land; Melksham Town Council.</p>

Table 5.102 [Policy 84 - Public open space and play facilities] key issues

Key issues raised (Policy 84 - Public open space and play facilities)	Respondent(s)
<b>Comments of support</b>	
<b>General support:</b> Supportive of Policy 84 as provision of public open space and play facilities, importance of provision is recognised.	Chippenham Town Council; Calne Without Parish Council; Natural England; Castlewood Properties Ventures Ltd; L&Q Estates; Miller Homes.
<b>Open Space Assessments:</b> Supportive of open space assessments where there could be potential adverse impacts on existing quantity, quality and accessibility of public open space as a result of development.	Chippenham Town Council.
<b>Wiltshire Open Space Assessment:</b> The policy references the Wiltshire Open Space Assessment. The study provides an up-to-date and robust evidence base; auditing the provision (quantity, quality and accessibility) of open space; setting standards for provision; identifying any surpluses or deficiencies; and recommended planning policy and developer contributions. The standards will be used to access proposals, recognising the need for improving the quality of existing open spaces in addition to requirements for new provision.	Melksham Town Council.
<b>Standards within Open Space Assessment:</b> The latest Open Space Assessment that informs Policy 84 provides a breakdown of updated standards for urban and rural areas which will help inform development and is therefore welcomed.	Miller Homes; Society of Merchant Venturers.
<b>Provision of public open space and play facilities:</b> The overall aim of Policy 84 to make provision for public open space and play facilities, where appropriate, aligns with the provisions of the NPPF (2023) paragraphs 92 and 98 and is therefore supported.	Society of Merchant Venturers.
<b>Policy wording</b>	
<b>Paragraph 5.94:</b> States that developers will be encouraged to discuss with town and parish councils prior to setting up an open space management company. Concern that 'encouraged' is not strong enough wording. Section 106 agreements are signed at the outline stage and then sold to the housebuilder, so this is the wrong time for this discussion.	Melksham Without Parish Council.
<b>Management:</b> Concern that maintaining and managing open spaces by local management groups at residents expense is an unfair burden, especially to those in affordable housing.	Individuals x10.
<b>Major development:</b> The policy references 'major developments' which requires definition as the DMPO definition is different to the definition in the NPPF.	Ludgershall Homes.

Key issues raised (Policy 84 - Public open space and play facilities)	Respondent(s)
<p><b>Criteria d:</b> Criteria d of the policy should be amended to state 'if not possible or appropriate, then provide off-site'. If a new development generates a need for public open space and the site is too small a financial contribution towards improving an existing facility or providing new space off-site may be more appropriate.</p>	Ludgershall Homes.
<p><b>Replacement of open space:</b> The policy allows for the replacement of open space, however this relates solely to 'public open space'. There is no justification to restrict this policy to just public space, the policy should provide for the re-provision of playing pitches, including those that are privately owned.</p>	White Horse Country Club Ltd.
<p><b>Developer contributions:</b> Section 106 contributions can only be sought to ensure a development mitigates its own impact and cannot be used to address existing shortfalls. The policy wording should be amended to include wording that explicitly states an assessment of provision will be undertaken at the time of an application to ensure any requests for Section 106 contributions remain evidenced and justified.</p>	Home Builders Federation; Tetlow King Planning on behalf of Terra Strategic Ltd.
<p><b>Adverse impact:</b> The policy refers to 'major new development which will have an adverse impact'. No indication or definition of how 'adverse impact' will be determined.</p>	Hallam Land Management.
<p><b>Existing policy LP1:</b> The policy is intended to replace LP1, however it does not contain wording 'existing sport and recreation provision' which was provided protection by the previous policy.</p>	Individuals x10.
<p><b>Definition of public open space:</b> 'Public open space' used in Policy 84 has the same meaning as 'open space', that is land used as a public garden, public recreation and disused burial grounds. If so, the word 'public' before 'open space' is underlining a meaning which is already in that term. The term 'public open space' as used in the policy does not appear to include privately owned recreational land, with no public use, or school playing fields, whether owned by public bodies or not.</p>	Individuals x10.
<p><b>Preamble to policy 84:</b> Paragraph 5.92 mentions the 2020 Wiltshire Open Space Assessment Update and identifies deficits of 'play space'. This is not reflected in the policy.</p>	Individuals x10.
<p><b>First paragraph of policy 84:</b> Suggested amended wording for the first paragraph of the policy.</p>	Barratt Homes and Vistry; Barratt Homes Group.
<p><b>Open Space Assessment:</b> The wording of the policy does not make it clear new provision should be based on the Wiltshire Open Space Assessment and accompanying guidance. It only states that this guidance applies to open space assessments prepared when there is an adverse impact on provision.</p>	Miller Homes; Society of Merchant Venturers.
<p><b>Open Space Assessment:</b> Recommended amendment to wording in relation to major applications and the provision of public open space.</p>	Backhouse Housing Ltd; Wadworth and Co. Ltd.



Key issues raised (Policy 84 - Public open space and play facilities)	Respondent(s)
<b>Open Space Assessment:</b> Paragraph 5.93 refers to the Wiltshire Open Space Assessment, which is not referenced within the wording of policy 84.	Persimmon Homes (South Coast) Ltd and Persimmon Homes (Wessex) Ltd; Individual x10.
<b>Section 106 Contributions:</b> Amendment to include wording that explicitly states an assessment of provision will be undertaken at the time of an application to ensure any requests for Section 106 contributions remain evidenced and justified. Any reference to the SPD should be removed from the policy.	Persimmon Homes (South Coast) Ltd and Persimmon Homes (Wessex) Ltd.
<b>Major Developments:</b> As currently worded the first paragraph of the policy is unclear as it states all ‘major’ development to make provisions for new areas of public open space and for ‘all’ development to protect and improve provision. This fails to recognise that not all major development will be able to accommodate on-site open space and will have an adverse impact on public open space provision, notably where the development site does not contain areas of public open space. It is unclear what the second sentence of the first paragraph of the policy is seeking to achieve. It is inconsistent with paragraph 16d) of the NPPF and is unsound.	Gleeson Land.
<b>Proposed wording of policy:</b> Amendment of the first two paragraphs of policy 84.	Gleeson Land.
<b>Suggested amendments</b>	
<b>Wildlife areas:</b> Recent applications, such as Bowood View and Pathfinder Place, have approved wildlife areas. Whilst positive, this along with equipped play areas and attenuation, can remove green public open spaces for children to just play and kick a ball.	Melksham Without Parish Council.
<b>Supply of open space:</b> The supply of open space against the standards in the types of open space, namely allotments, amenity green space and play space (Children and Youth). The Accessible Natural Greenspace Standard Provision (ANGSt) requires at least one accessible 20-hectare site within 2 kilometres of home, there is a gap in this provision. The policy could refer to the provision of open space by major development that reflects identified deficiencies in the local area in the open space assessment. The policy in JMNP2 could also refer to this evidence-based document.	Melksham Town Council.
<b>Financial contributions:</b> The policy is welcomed and supported. The policy should be expanded to include a requirement to provide appropriate financial contributions for local existing public open spaces and locally accessible nature reserves that will be used by new residents. This should compensate for increased visitor manager costs that would be incurred and improve infrastructure to increase resilience and visitor capacity of sites.	Natural England.
<b>Open space assessment:</b> Encourage the council to undertake a new county-wide open space assessment, as this will not require site-specific analysis of open space to be submitted with planning applications.	South West Housing Association Planning Consortium.

Key issues raised (Policy 84 - Public open space and play facilities)	Respondent(s)
<p><b>Paragraph 5.94:</b> Clarification is required in terms of how open space management discussions with town/parish councils are assessed for engagement, especially if no agreement is reached.</p>	<p>Persimmon Homes (South Coast) Ltd and Persimmon Homes (Wessex) Ltd; Home Builders Federation; Tetlow King Planning on behalf of Terra Strategic Ltd.</p>
<p><b>Open Space Assessment:</b> Clarity is required within policy 84 as to when an 'open space assessment' should be submitted with an application, it may be unclear when it is considered there is 'an adverse impact'.</p>	<p>Miller Homes; Society of Merchant Venturers.</p>
<p><b>Concerns</b></p>	
<p><b>Adoption of open spaces:</b> Maintenance of public open space in new developments should be maintained by the council, not through estate management companies. This places an additional financial burden on residents, especially in affordable housing areas. Residents are simultaneously funding public spaces in established areas through council tax.</p>	<p>Calne Without Parish Council; Sustainable Calne; Individuals x10.</p>
<p><b>Deficiencies:</b> The policy does not allow for identified deficiencies in open space and play facilities to be addressed through major new development.</p>	<p>Individuals x10.</p>
<p><b>Provision of facilities:</b> The policy is not specific enough. Planned schemes for different age groups should be provided to mitigate the risk of small, unexciting and under used facilities, which is what has happened with developers making decisions on provision.</p>	<p>Sustainable Calne.</p>
<p><b>Developer contributions:</b> Policy 84 does not set out the approach for calculating and securing developer contributions for open space and play facilities and defers to the Planning Obligations SPD. It is not clear whether the existing SPD is being referred to or a new SPD, to be prepared following the adoption of the plan. SPD's are not subject to examination, which is believed to be ineffective and inconsistent with national policy.</p>	<p>Richborough Estates.</p>
<p><b>Open space standards:</b> To ensure the policy is compliant with paragraphs 16(d) and 34 of the NPPF, it is suggested that the public open space standards are incorporated into the policy. The public open space standards should only be subject of a review through the LPR, where the implications of the higher standards, including capacity and viability of allocations, can be fully considered. Policy 84 appears to allow for differing open space standards to be adopted via a non-statutory document, which may not be subject to formal consultation. Concern updated standards could be introduced after the adoption of the local plan, which could require higher public open space allocations than evidence currently suggests. This could undermine the capacity of existing allocations and lead to ineffective allocations. The viability report adopts the costs set out in the county's open space calculator 50. It is assumed that is the same calculator referred to in the 2020 Open Space Assessment. The standards proposed within that document will be imbedded into the viability assessment process. A change to the public open space standards is likely to have implications on the viability of development.</p>	<p>Bloor Homes South West.</p>

Key issues raised (Policy 84 - Public open space and play facilities)	Respondent(s)
<b>NPPF/duty to cooperate:</b> The draft policy is not sound as it fails to comply with paragraphs 93, 98 and 99 of the NPPF and may fail to comply with the duty to cooperate as the loss of some protection of recreational facilities is not clear in the consultation.	Individuals x10.
<b>Open Space Assessment:</b> The standards within the Open Space Assessment Update (2023) have been updated from the Open Space Study (2004) and is therefore not directly comparable. The Open Space Assessment (section 9.2) acknowledges that some changes in provision may be due to how open space is recorded and how definitions can 'often be blurred'. Standards have increased.	Miller Homes.
<b>Open Space Assessment:</b> The requirement for an Open Space Assessment in support of a planning application appears to only relate to developments that will have an adverse impact. It does not relate to or appear to be informed by the standards set out in the Open Space Assessment, referenced in paragraph 5.92.	Persimmon Homes (South Coast) Ltd and Persimmon Homes (Wessex) Ltd.
<b>Section 106 contributions:</b> Section 106 contributions required should only be used to mitigate the impact arising from the development and cannot be required to address existing shortfalls. It will be essential to have robust and up-to-date evidence around play space provision, open space provision and playing pitches and calculate any developer contributions arising at the time a planning application is made.	Persimmon Homes (South Coast) Ltd and Persimmon Homes (Wessex) Ltd.
<b>Objection</b>	
<b>NPPF Paragraph 35:</b> Policy 84 as currently worded does not meet paragraph 35 of the NPPF regarding the policy being justified and effective.	Society of Merchant Venturers.
<b>SPD:</b> The council is seeking to give the local plan status through the existing Planning Obligations Supplementary Planning Document. This is not appropriate as planning policy must be made through the local plan process to ensure the mandatory requirements for public consultation and independent scrutiny through the examination process. If the council wish to provide additional advice on the interpretation of the policy this should be done through an SPD that is prepared and consulted on after the adoption of the local plan.	Home Builders Federation; Tetlow King Planning on behalf of Terra Strategic Ltd.
<b>CIL Regulations:</b> The policy states 'all new development must make provision for public open space and, where appropriate, play facilities'. This is not compatible with the statutory test for planning obligations as stated in regulation 122 of CIL. The regulations state any obligations for public open space can only be lawful where they are necessary to make the development acceptable in planning terms. If there was an abundance of public open space in the immediate vicinity of the site, it would be unlawful under the regulations to provide further provision on site as part of a planning obligation. An evaluation of open space locally would need to be undertaken to establish a surplus or deficit and then calculate the need for provision. The provision on site should reflect the	Barratt Homes and Vistry; Backhouse Housing Ltd; Wadworth and Co. Ltd; Barratt Homes Group.

Key issues raised (Policy 84 - Public open space and play facilities)	Respondent(s)
<p>level of need for the different typologies of open space which should be reflected in the first paragraph of the policy. The remainder of the policy relates only to circumstances where adverse impact is had upon existing provision and the need for an assessment to understand the implications is recognised.</p>	
<p><b>Site allocations</b></p>	
<p><b>Policies map:</b> Undeveloped land to the West, North and East of the Police HQ and the whole of the Parkfields site have been incorrectly allocated under Policy 84 on the emerging policies map. The site currently has no publicly accessible open space due to it being a secure operational policing site. Neither sites were assessed in the Open Space Assessment or Play Pitch Strategy which forms part of the evidence for the emerging plan. Allocating either of these sites is not justified or effective. The northern and eastern Policy 84 allocation is also allocated as part of the principal employment area under policies 14 and 65. There is no public access to this land and it would be contradictory to allocate land for two competing land uses. Two allocations would burden the policy support for retention and intensification of an existing principal employment area as set out in policies 14 and 65. The western area, along with the area allocated under Policy 65, is in daily use for operational police purposes and is not publicly accessible. The Parkfields site is also allocated under Policy 84, with no public access and additionally has an extant planning permission for residential development.</p>	<p>The Police and Crime Commissioner for Wiltshire and Swindon and The Chief Constable of Wiltshire Police.</p>
<p><b>Policies map:</b> The interactive policies map identifies land within the current employment allocation (H2 D/E1) at Old Sarum as within Policy 84. There is no justification as to why the land is now within Policy 84. It is assumed this is a drafting error and should be reviewed and updated accordingly.</p>	<p>Persimmon Homes Wessex.</p>
<p><b>Site 3410, Durrington:</b> The site is private open space which was previously leased to Durrington Town Council, when the designation was placed on the land the planning process did not recognise the private ownership of the land. The site has not been available for public use since December 2019. The site is proposed to provide a public park and housing. The freehold element of the park would be transferred to Durrington Town Council to secure the open space in perpetuity and meet the sentiments expressed when the land was allocated as an Asset of Community Value.</p>	<p>Durrington Square Ltd.</p>
<p><b>Coombe House School:</b> Policy 84 designates the site as an Open Space and Play Facility, the campus is not open to the general public other than at specific times with access to limited pre-brooked activities. The policy is not relevant to the Coombe House site owned by Dorset Council and the designation should be removed.</p>	<p>Dorset Council.</p>

## Local Plan section 5: Delivering the spatial objectives, Environment

**5.31** Please see below the key issues tables listing the key issues raised for the parts of the plan within section 5: delivering the spatial objectives (Environment policies), namely:

- Environment section overall
- Policy 85: Sustainable construction and low carbon energy
- Policy 86: Renewable energy installations
- Policy 87: Embodied carbon
- Policy 88: Biodiversity and geodiversity
- Policy 89: Biodiversity Net Gain
- Policy 90: Trees, hedgerows, and woodland
- Policy 91: Conserving and enhancing Wiltshire's landscapes
- Policy 92: Conserving and enhancing dark skies
- Policy 93: Green and blue infrastructure
- Policy 94: Wiltshire's canals and the boating community
- Policy 95: Flood risk
- Policy 96: Water resources
- Policy 97: Contaminated land
- Policy 98: Ensuring high quality design and place shaping
- Policy 99: Ensuring the conservation and enhancement of the historic environment
- Policy 100: The Stonehenge, Avebury and associated sites World Heritage Site
- Policy 101: Air quality



Table 5.103 [Environment section general] key issues

Key issues raised (Environment section general)	Respondent(s)
<b>Format</b>	
<p><b>Environment section is last:</b> Leaving 'Environment' to the end of the Local Plan downplays the environmental challenges faced when preparing a Local Plan for a fundamentally rural county with a relatively high proportion of nationally designated landscapes, habitats, and heritage features.</p>	<p>Cranborne Chase National Landscape.</p>
<b>Monitoring</b>	
<p><b>Publish monitoring data:</b> Given the strategic importance of the environment policies and the need for WC to demonstrate its commitment to the national targets, the council should publish a monthly dashboard to demonstrate this commitment and to provide residents with a progress report that should highlight progress and any risks or opportunities.</p>	<p>Community Action Whitley And Shaw.</p>

Table 5.104 [Policy 85 - Sustainable construction and low carbon energy] key issues raised

Key issues raised (Policy 85 - Sustainable construction and low carbon energy)	Respondent(s)
<b>Policy Wording</b>	
<p><b>Policy Wording:</b> Responses are mixed as to whether the policy goes far enough and how onerous the policy is. It has been suggested that targets set out within the policy be aligned with the RIBA 2030 Climate Challenge or Part L Uplift and Future Homes Standard targets to provide a more deliverable set of targets consistent with national policy. Non-residential buildings should utilise TM52 to avoid overheating as a consistent methodology. Suggested that the current targets are not based on any evidence and should not be applied to individual/small scale sites or changes of use, with no evidence of a specific costing exercise or viability assessment being undertaken. As a whole, the policy will significantly impact development viability and the deviation beyond national guidance is not considered to be sufficiently evidenced/justified, with the policy creating confusion by not setting out a clear methodology for energy calculations (e.g. how is the floor area calculated – Gross Internal Area, Net Internal Area and/or heated spaces) which has the potential to lead to inconsistent decision making. Policy wording should be amended to net zero-carbon in operation.</p>	<p>Acorn Property Group; Barratt Homes (Bristol); Barratt Homes Group; Barwood Land; Bellway Homes, Richborough; Bloor Homes South West Ltd; Brimble Lea; Cooper Estates; Corsham Town Council; David Wilson (South); Development Company; Dilton Marsh LVA LLP; Gleeson Land; Hallam Land Management; Hannick Homes; Hill Residential Ltd; Hills Homes; Home Builders Federation (HBF); L&amp;Q Estates; Leda Properties; Ludgershall Homes; Mac Mic Group; Martin Grant Homes; McCarthy Stone Retirement Lifestyle Ltd; Paul Bowerman Discretionary Trust; Persimmon Homes (South Coast) Ltd &amp; Persimmon Homes (Wessex) Ltd; Quidhampton Developments Ltd; Railway Pension Nominees Ltd; Society of Merchant Ventures (SMV); South West Housing Association Planning Consortium (SWHAPC); St Modwen Logistics and The Sealy Family Trust; St Modwen Logistics; Stantonbury Building and Development Company; TOF Corporate Trustees Ltd; Urchfont LVA LLP; Vistry; Waddeton Park Ltd; White Horse Country Club Ltd; Wiltshire Climate Alliance; Woodhouse Developments (Amesbury) Ltd; Wyatt Homes; Individual x10.</p>
<p><b>Building Extensions:</b> Policy should also cover extensions to existing buildings.</p>	<p>Sustainable Calne; Wiltshire Climate Alliance; Individual x10.</p>
<p><b>Employment:</b> Policy should exclude logistics HGV movements.</p>	<p>St Modwen Logistics and The Sealy Family Trust; St Modwen Logistics.</p>



Key issues raised (Policy 85 - Sustainable construction and low carbon energy)	Respondent(s)
<p><b>Sustainable Practices:</b> Cradle to cradle assessments and Circular Economy strategy should be used in the design process. New homes should not add to the ‘retrofit problem’. Policy should require all new residential to have low or negative embedded carbon through efficient design and construction. Sustainable construction checklist must be ready.</p>	<p>Corsham Town Council; Individual x10.</p>
<p><b>Whole Life Carbon:</b> Cradle to cradle assessments should be a baseline requirement with optioneering to establish the best carbon outcomes at early design stages.</p>	<p>Individuals x10.</p>
<p><b>AONB Management Plan:</b> The focus on sustainable construction is welcomed, but there is disappointment that the sustainable construction policy in the AONB Management Plan is not replicated. The significance of the National Landscape is considered to be downplayed.</p>	<p>Cranborne Chase Area of Outstanding Natural Beauty.</p>
<p><b>Policy Implementation</b></p>	
<p><b>Energy Generation &amp; Consumption:</b> The policy is unenforceable as once occupied a developer has no control over the occupant’s energy use. Separately, suggested that solar thermal also be included in addition to requirements for Electric Vehicle charging points.</p>	<p>Castlewood Properties Ventures Ltd; Home Builders Federation (HBF); Woodhouse Developments (Amesbury) Ltd and Bloor Homes Ltd (Southern Region); Mac Mic Group; Hills Homes; Persimmon Homes (South Coast) Ltd &amp; Persimmon Homes (Wessex) Ltd; Barwood Land; Bloor Homes South West Ltd; South West Housing Association Planning Consortium (SWHAPC); Leda Properties; Corsham Town Council; Individuals x10.</p>
<p><b>Heating Networks:</b> Suggested that connecting to district heating networks is unlikely to be viable for new builds – heat pumps should be specified as an alternative. Suggested to state the intention that no new housing developments will be connected to the gas network.</p>	<p>Corsham Town Council; Individuals x10.</p>
<p><b>On-Site Renewables:</b> Suggested to be highly unlikely that residential development will be able to generate 100% of the energy required on site. The Policy wording is suggested to restrict opportunities for supply of energy from off-site renewable energy sources. Concern around the storage of energy if renewables are used and how the policy addresses this.</p>	<p>Home Builders Federation (HBF); Wyatt Homes; Bloor Homes (South West) Ltd; Hills Homes; Persimmon Homes (South Coast) Ltd &amp; Persimmon Homes (Wessex) Ltd; TOF Corporate Trustees Ltd; Barratt Homes Group; Barratt Homes (Bristol) and David Wilson (South); Barratt Homes and Vistry; TOF Corporate Trustees Ltd; Miller Homes.</p>

Key issues raised (Policy 85 - Sustainable construction and low carbon energy)	Respondent(s)
<p><b>Off-Site Contributions:</b> Support for a carbon credit system, however, it is currently unclear regarding what the developer contributions would be or how they are calculated. It is considered that greater consideration is needed for the policy and its impacts on viability.</p>	<p>NHS Property Services, Wiltshire Climate Alliance; Gleeson Ltd; Society of Merchant Venturers (SMV); Wyatt Homes; Bellway Homes; Woodhouse Developments (Amesbury) Ltd and Bloor Homes Ltd (Southern Region); Barratt Homes Group; Barratt Homes and Vistry; Hills Homes; TOF Corporate Trustees Ltd; Bloor Homes South West Ltd; Ludgershall Homes; Individuals x10.</p>
<p><b>Military Establishments Exempt:</b> MoD property is exempt from standards set out within this policy.</p>	<p>Ministry of Defence.</p>

Table 5.105 [Policy 86 - Renewable energy installations) key issues

Key issues raised (Policy 86 - Renewable energy installations)	Respondent(s)
<b>Renewable Energy Generation</b>	
<b>Renewable energy:</b> Concern that the policy prejudices by stating that proposals will be supported - it is recommended to change to this 'will be encouraged'. Reference should also be made to preserving the purposes of national designations include conserving and enhancing natural beauty.	Cranborne Chase Area of Outstanding Natural Beauty.
<b>Onshore Wind:</b> Suggested that commercial onshore wind is not sufficiently supported. The lack of support for onshore wind generation is considered to be unsound because Wiltshire will be unable to deliver its own Climate Change Strategy, unable to meet renewable energy capacity targets and will be inconsistent with national policy, with the NPPF now supporting selective onshore wind development. It is suggested that the evidence base for the policy is reviewed to identify onshore wind sites.	Biddestone and Slaughterford Parish Council; Bradford on Avon Town Council; Chippenham Town Council; Wiltshire Climate Alliance; Eden Renewables; Individuals x10.
<b>Community-led schemes:</b> Support for community-led renewable energy schemes could go further to encourage and maximise schemes by identifying sites and setting specific targets for renewable generation.	Bradford on Avon Town Council.
<b>Solar PV:</b> Plan offers inadequate policies for Solar Photovoltaics (PV), leading to concern over the ability to deliver on climate targets and subsequent concern over the soundness of the plan. Suggested that PVs should not be ruled out on listed buildings, that additional reference should be given to roof mounted solar and that further support should be provided for ground mounted Solar PV.	Biddestone and Slaughterford Parish Council; Martingate Corsham; Wiltshire Climate Alliance; Individuals x10.
<b>Targets:</b> Suggested that a clear framework should be set out for the delivery of targets set out within the Renewable Energy Assessment 2023.	Wiltshire Wildlife Community Energy; Individuals x10.
<b>Criteria:</b> Concern raised whether all the criteria listed, namely 'g' and 'k', accord with national policy and include glare respectively.	Chippenham Town Council; Eden Renewables; Melksham Without Parish Council.
<b>New Sites</b>	
<b>Military Sites:</b> Suggested that obsolete military sites have the potential to be used for renewable energy installations.	Chippenham Town Council; Individual x10.
<b>Landscape Impact:</b> Reference within the plan (para 5.112) to placing the reduction of greenhouse gas emissions above protection of valued landscapes should be removed.	Councillor x1.
<b>Terminology &amp; Evidence Base</b>	
<b>Glossary Omissions:</b> No definitions of net zero, carbon neutral, low carbon or renewable energy provided.	Wiltshire Wildlife Community Energy; Individual x10.

Key issues raised (Policy 86 - Renewable energy installations)	Respondent(s)
<b>Evidence Base:</b> Policy is not currently supported by key evidence commissioned by Wiltshire Council (Land Use Consultants study (February 2023)).	Biddestone and Slaughterford Parish Council.

Table 5.106 [Policy 87 - Embodied carbon] key issues

Key issues raised (Policy 87 - Embodied carbon)	Respondent(s)
<b>Policy Wording</b>	
<p><b>Scope:</b> All development should be made to address the issue of embodied carbon. Conversely, it has been suggested that given it is the role of Building Regulations to set the sustainable construction standards, this policy falls outside the scope of planning, with national planning policy and guidance being silent on this topic. The Policy is also suggested as being inconsistent with neighbouring authorities.</p>	<p>McCarthy Stone Retirement Lifestyles Ltd; Quidhampton Developments Ltd; Hallam Land Management; St Modwen Logistics; St Modwen Logistics and The Sealy Family Trust; White Horse County Club Ltd; Gleeson Land; Hannick Homes; Cooper Estates; Martin Grant Homes; St Philips Land Ltd; Hill Residential Ltd; Paul Bowerman Discretionary Trust; Leda Properties Ltd; David Wilson Homes; Bloor Homes South West Ltd; Wyatt Homes; Individuals x10.</p>
<p><b>Clarification:</b> Policy is vague and fails to explain the requirements or methodology of the Embodied Carbon Assessment. Unclear which elements of the 'Building Life Cycle Stages' the Policy refers to (all stages of the life cycle or just some).</p>	<p>St Modwen Logistics; St Modwen Logistics and The Sealy Family Trust; Wyatt Homes; Society of Merchant Venturers (SMV); Barratt Homes and Vistry.</p>
<p><b>900kg/sqm of carbon:</b> The 900kg/sqm figure is not sufficiently justified or evidenced, including a lack of reference within the Wiltshire Renewable Energy Assessment, with suggestions made by different parties that it should be lower than 900kg/sqm with others advising this would act as a barrier to development. It has been suggested that the 900kg/sqm figure is based on LETI standards which have not been adopted into Building Regulations, which is the principal legislation in relation to sustainable construction requirements and should be referred to. Concern is raised around the deliverability and viability of embodied carbon at this stage and whether the quoted figure is achievable for new development or necessary.</p>	<p>Barratt Homes Group; Barratt Homes and Vistry; Bloor Homes South West Ltd; Castlewood Venture Partnerships; Gleeson Land;</p> <p>Hallam Land Management; Hannick Homes; Cooper Estates; Hills Homes; Home Builders Federation; L&amp;Q Estates; Leda Properties Ltd; Ludgershall Homes; Martin Grant Homes; McCarthy Stone Retirement Lifestyles Ltd; Paul Bowerman Discretionary Trust; Persimmon Homes (South Coast) Ltd &amp; Persimmon Homes (Wessex Ltd); Quidhampton Developments Ltd; Richborough Estates; Society of Merchant Venturers (SMV); South West Housing Association Planning Consortium; St Modwen Logistics and The Sealy Family Trust; St</p>

Key issues raised (Policy 87 - Embodied carbon)	Respondent(s)
	Modwen Logistics; St Phillips Land Ltd; Wainhomes (Severn Valley) Ltd; White Horse Country Club Ltd; Wiltshire Climate Alliance; Woodhouse Developments (Amesbury) Ltd; Individuals x10.
<b>Implementation</b>	
<b>Resourcing:</b> The Council lacks the resources to assess all the Embodied Carbon Assessments this policy will generate, or any indication of how they will be monitored.	Wiltshire Climate Alliance; Hallam Land Management; Society of Merchant Venturers (SMV); Hill Residential Ltd; Home Builders Federation (HBF); Paul Bowerman Discretionary Trust; Leda Properties Ltd; St Philips Land Ltd; David Wilson Homes; L&Q Estates; Individuals x10.
<b>Environmental Product Declaration:</b> The Council need to verify that embodied carbon figures are available to developers from suppliers through an Environmental Product Declaration.	McCarthy Stone Retirement Lifestyles Ltd.
<b>Viability:</b> The Council has not considered the impact of this Policy within the 'Assessment of Local Plan Viability and the Review of the Wiltshire Community Infrastructure Levy Charging Schedule (September 2023)'.	Paul Bowerman Discretionary Trust; Leda Properties Ltd; St Philips Land Ltd.
<b>Ineffective:</b> Suggestions within Paragraph 5.116 that the Policy is 'unlikely' to drive a reduction in embodied carbon bring the effectiveness of the Policy into question.	Bloor Homes (South West) Ltd; Persimmon Homes (South Coast) Ltd & Persimmon Homes (Wessex) Ltd.
<b>Financial Off-Setting:</b> There is no reference to a financial off-setting scheme if targets cannot be feasibly met.	Bloor Homes (South West) Ltd; Persimmon Homes (South Coast) Ltd & Persimmon Homes (Wessex) Ltd.
<b>Building Life Cycle Stages:</b> Unclear whether the Policy is referring to all 'Building Life Cycle Stages'.	St Modwen Logistics; St Modwen Logistics and The Sealy Family Trust; Wyatt Homes.

**Table 5.107 [Policy 88 - Biodiversity and geodiversity] key issues**

Key issues raised (Policy 88 - Biodiversity and geodiversity)	Respondent(s)
<b>Policy support</b>	
<p><b>Policy support:</b> Conditional support for the policy and the standards it sets to protect and enhance habitats, species and geological interests and in doing so strengthening ecological networks and local and national goals for nature recovery. Specific support also noted for the intention to ensure measures to provide for biodiversity and species are integrated into the built environment.</p>	<p>Natural England; Catesby; Chippenham Town Council; Calne Without Parish Council; Melksham Town Council; Individuals x10.</p>
<b>Policy / supporting text wording</b>	
<p><b>Irreplaceable habitats [Para 5.118]:</b> In line with para. 180 of the NPPF, the list should be expanded to include specific mention of irreplaceable habitats. The policy should also clearly set out the protection afforded to irreplaceable habitats as set out in NPPF (2022) paragraph 180. A reference to Natural England and the Forestry Commission’s standing advice for ancient woodland, ancient trees and veteran trees is also recommended.</p>	<p>Natural England; Wiltshire Wildlife Trust.</p>
<p><b>UK National Network Sites:</b> Recommended that the policy or supporting text includes the definition of “UK National Network Sites” and how impacts, directly or indirectly, should be avoided. The policy in relation UK National Network Sites should make it clear these include proposed and potential sites as set out in NPPF paragraph 181.</p>	<p>Natural England.</p>
<p><b>Protection for SSSI / NNR:</b> The policy should set out the protection afforded to sites designated as nationally important (SSSI and NNR) as set out in NPPF (2022) paragraph 180. That is that development that is “likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted.</p>	<p>Natural England.</p>
<p><b>Protected species:</b> Policy should include a requirement for all development to meet Natural England’s standing advice for protected species.</p>	<p>Natural England.</p>
<p><b>Protection:</b> First section of Policy 88 appears to apply to all habitats, regardless of the level of importance associated with their value. Conversely, para. 174(a) of the NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment by “protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).” The policy should be redrafted to allow for a consideration of the level of importance of any assets. The CIEEM Guidelines for Ecological Impact Assessment in the UK and Ireland (CIEEM, 2019) provide useful guidance in defining importance.</p>	<p>Bloor Homes; L&amp;Q Estates; Woodhouse Developments (Amesbury) Ltd; Gleeson; Wadworth and Co. Ltd.</p>
<p><b>Prescriptive:</b> The policy is over prescriptive and does not allow the flexibility to bring forward the most appropriate measures based on the site location and proposed development.</p>	<p>L&amp;Q Estates.</p>

Key issues raised (Policy 88 - Biodiversity and geodiversity)	Respondent(s)
<p><b>All development proposals:</b> Concern was voiced that the policy requirements are specific requirements to “all proposals”. Is it that the Policy is to apply this to new buildings or major development proposals? The policy should be amended accordingly. For example, applications for changes of use or shopfront alterations cannot reasonably be expected to include bird next bricks, bat boxes, overhanging eaves or hedgehog highways.</p>	<p>Railway Pension Nominees Ltd.</p>
<p><b>Priority habitat:</b> Within the section "Local sites, priority habitat and habitats of principal importance and local ecological networks" it is recommended that reference to ‘<i>priority habitat</i>’ is deleted as this is addressed through the inclusion of Habitats of Principal Importance, as per Section 41 the Natural Environment and Rural Communities Act 2006.</p>	<p>Bloor Homes; Woodhouse Developments (Amesbury) Ltd; Gleeson.</p>
<p><b>‘Priority habitat’ and ‘habitats of principal importance’:</b> It is unclear as to the distinction between ‘priority habitat’ and ‘habitats of principal importance’ and it is considered that these are one and the same.</p>	<p>Miller Homes; Society of Merchant Venturers.</p>
<p><b>Buffers:</b> Reference to buffers in this policy should be amended to take into account not simply the provision of a “<i>buffer</i>” but actually what it comprises. For instance a buffer of a set distance (10 metre) of a particular habitat (wildflower grassland planting) may be suitable for mitigating the impacts on a particular habitat with a different buffer distance and habitat requirement needed elsewhere.</p>	<p>White Horse Country Club Ltd; Martin Grant Homes; Hannick Homes; Cooper Estates; Quidhampton Developments Ltd.</p>
<p><b>Watercourse buffers:</b> At para 5.128, or as suitable, a sentence should be added to require an undeveloped ecological buffer zone at least 10m wide on all sides of every watercourse/waterbody.</p>	<p>Environment Agency.</p>
<p><b>Sensitive wildlife species and habitats:</b> The reference to sensitive wildlife species and habitats is very broad and poorly defined. This should be targeted towards key species instead, such as protected and notable (such as priority) species, otherwise all species may be pulled into the intentions of this policy.</p>	<p>White Horse Country Club Ltd; Martin Grant Homes; Hannick Homes; Cooper Estates; Quidhampton Developments Ltd.</p>
<p><b>Development proposals must demonstrate how they protect features of nature conservation value as part of the design rationale:</b> This is not always possible to achieve. That is the reason why a mitigation hierarchy exists (para. 180 NPPF) which states that compensatory measures can be applied when significant harm to biodiversity will occur. By insisting upon protection and at the same time applying the hierarchy, the policy contradicts itself and the NPPF. Compensatory measures are explicitly stated to be necessary in some instances within the explanatory text for the policy (Paragraph 5.123). The wording of the policy must be updated to reflect the NPPF.</p>	<p>Barratt Homes and Vistry; Waddeton Park Ltd; Barratt Group; Wadworth and Co. Ltd; Backhouse Housing; St Modwen Logistics and The Sealy Family Trust; St. Modwen Logistics.</p>
<p><b>Exceptional circumstances:</b> This wording unnecessarily overstates the thresholds which are set out in national policy. The use of the word ‘exceptional’ when referring to circumstances where the mitigation hierarchy should apply is not in accordance with national policy.</p>	<p>Barratt Homes and Vistry; Waddeton Park Ltd; Barratt Group; Wadworth and Co. Ltd; Backhouse Housing; St Modwen Logistics and The Sealy Family Trust; St. Modwen Logistics.</p>



Key issues raised (Policy 88 - Biodiversity and geodiversity)	Respondent(s)
<p><b>Exceptional circumstances:</b> County Wildlife Sites are habitats that are either locally important or support species that are of local importance and the loss or damage to these sites should not be acceptable. The inclusion of these circumstances, especially including phrases such as “reasonably” and “as far as possible” are not strong and are open to interpretation. This considerably weakens the previous statement that damage and disturbance will be unacceptable. This is in direct contrast to the NPPF which states that sites should be “safeguarded, protected and enhanced”.</p>	Wiltshire Wildlife Trust.
<p><b>No exceptions or mitigation / compensation:</b> The policy states that development should avoid negative impacts on ‘<i>priority habitat, habitats of principal importance, ecological networks, and wildlife corridors</i>’ but does not then make provision for any exceptions or for mitigation or compensation measures which may appropriately address any negative impacts. Supporting paragraph 5.122 is clear that ‘All effects upon the natural environment should be addressed sequentially in accordance with the principle of the ‘mitigation hierarchy’ and therefore this should be fully reflected within the policy wording.</p>	Miller Homes; Society of Merchant Venturers.
<p><b>No net loss of biodiversity:</b> There is some discrepancy in the text used for Policies 88 and 89 of the draft Local Plan. Policy 88 requires “<i>no net loss of biodiversity</i>”, whereas Policy 89 requires a minimum of 20% biodiversity net gain to be achieved at development sites.</p>	Miller Homes; The Stantonbury Building and Development Company; Society of Merchant Venturers.
<p><b>SuDS / objectives of water framework directive:</b> As the Environmental Quality aims are an aim of the Plan (section 2.21 and 5.118), the objectives of the Water Framework Directive and the incorporation of SUDS should be detailed within Policy 96 and or/ Policy 88. SUDS should be considered for all developments to reduce the effect of surface and groundwater infiltration into the sewer network which can lead to water pollution and failure of Water Framework Directive objectives.</p>	Environment Agency.
<p><b>Nature based solutions:</b> There should be support for nature-based solutions, including landscape-scale nature recovery partnerships and projects (i.e. a ‘policy hook’ under which proposals for such proposals can be supported in principle and considered in practice). This should incorporate support for climate mitigation and adaptation projects, including natural flood management and carbon storage.</p>	National Trust.
<p><b>Ecological networks / corridors:</b> Should be further emphasis on existing ecological corridors used by priority species which could include hedgerows, line of trees, byways and waterways used for foraging and migration between maternity and hibernation sites. It is essential that fish passage, flow and sediment movement within rivers and streams are considered, barriers removed or avoided and opportunities for the restoration of natural processes prioritised.</p>	Wiltshire Wildlife Trust.

Key issues raised (Policy 88 - Biodiversity and geodiversity)	Respondent(s)
<p><b>County Wildlife sites:</b> The Local Plan currently does not recognise the pressures of development on sites of particular importance for wildlife such as County Wildlife Sites. To mitigate against the additional demands on the sites, by providing additional open green-space and connecting and/or buffering these sites by following Lawton's bigger, better, more joined up principle. Creating areas of additional green space should be in addition to Biodiversity Net Gain and this should be made clear within the policy.</p>	Wiltshire Wildlife Trust.
<p><b>Hampshire Avon / watercourses:</b> Wiltshire Wildlife Trust feels that policy 88 does not reflect the importance of the River Avon (Hampshire) or other rivers within Wiltshire, with the Environment agency believing greater emphasis should be placed on the importance of the aquatic environment specifically noting the importance of chalk rivers within Wiltshire needing additional attention (Wiltshire contains a significant proportion of the world's chalk rivers).</p> <p>Warminster Town Council echoed this outlining that Core Policy 69 which specifically protected the River Avon SAC (including the Wylye) has been deleted and replaced with Policy 88 (p.193) which makes no mention of chalk streams, the Hampshire Avon or other internationally important sites in Wiltshire.</p>	Wiltshire Wildlife Trust; Warminster Town Council; Environment Agency.
<p><b>Local Nature Recovery Strategy</b></p>	
<p><b>Local Nature Recovery Strategy (including 30 x 30):</b> Specific reference to the Local Nature Recovery Strategy should be included; there is a legal requirement under the Environment Act 2021 (when Part 6 is implemented) for Wiltshire Council to produce this Strategy and it is recommended that reference is made to it. Further emphasis should be placed on this in line with the Global Biodiversity Framework, including protecting 30% of the UK's land for nature through the Nature Recovery Network. There is no mention of the Government's 30x30 target, the commitment to protect at least 30% of land and sea for nature by 2030.</p>	Bloor Homes; National Trust; Wiltshire Wildlife Trust.
<p><b>Local Nature Recovery Strategy (protection):</b> The Local Nature Recovery Strategy should be used in relation to Biodiversity Net Gain, but also should highlight areas of importance to protect. All areas within the Local Nature Recovery Strategy and therefore identified as high importance for wildlife or strategic opportunities for restoration, enhancement or creation of habitat should not be developed and policy should reflect this.</p>	Wiltshire Wildlife Trust.
<p><b>Biodiversity in the built environment</b></p>	
<p><b>Qualified ecologist [Para 5.136]:</b> Ecologist is not always required to recommend enhancements for small applications such as swift bricks given there is best practice guidance to follow.</p>	Swifts Local Network: Swifts & Planning Group @ Swifts Local Network: Swifts & Planning Group.

Key issues raised (Policy 88 - Biodiversity and geodiversity)	Respondent(s)
<p><b>Management:</b> The provision of such features within the built environment, such as wildflower verges and meadows, should be expanded to ensure there is provision and means to manage these. This should not simply fall to residents to maintain and fund.</p>	<p>Natural England; Calne Community Neighbourhood Plan Steering Group.</p>
<p><b>BS 42021:2022 guidance / biodiversity in the built environment justification:</b> There appears to be little justification provided as to why the enhanced requirements are proposed above those outlined within the British standard for the provision of integrated nest boxes to dwelling ratio . Some representors also outlined there was little justification for the criteria more generally. On this basis it was deemed the Policy is not justified.</p>	<p>Bloor Homes; L&amp;Q estates; David Wilson Homes; St Philips Land Ltd; Woodhouse Developments (Amesbury) Ltd; Gleeson; Barratt Homes and Vistry; Barratt and David Wilson Homes; Wadworth and Co. Ltd; Backhouse Housing.</p>
<p><b>Too prescriptive:</b> There should be flexibility to deliver measures that work on a site by site basis as advised by qualified ecologists and also in considering of other site constraints and design objectives enabling the delivery of such measures to be tailored to the specific proposal. Is there any value in a brownfield site within a town delivering bat bricks? It is not reasonable to expect small scale development proposals to deliver these measures. Similarly, the reference to overhanging eaves is not an appropriate design response in all situations. These features are set out as minimum requirements for all proposals, with no consideration for instances in which it would not be feasible, either for reasons of viability or site characteristics, to provide them.</p>	<p>Wainhomes; St Philips Land Ltd; White Horse Country Club Ltd; Martin Grant Homes; Hannick Homes; Cooper Estates; Quidhampton Developments Ltd; Barratt Homes and Vistry; Waddeton Park Ltd; Barratt Group; Home Builders Federation; Ludgershall Homes; Wadworth and Co. Ltd; Richborough Estates; Backhouse Housing; Miller Homes; The Stantonbury Building and Development Company; L&amp;Q Estates; Society of Merchant Venturers; St Modwen Logistics and The Sealy Family Trust; Bellway; Acorn Property Group; St. Modwen Logistics.</p>
<p><b>In addition to BNG:</b> It is unjustified that the features quoted should be in addition to features required as part of biodiversity net gain and as such not able to be included in calculations. A statutory metric can determine what can and cant be included in calculations. The second group of 'other features' 1 to 5 include matters that can (and regularly) form part of the delivery of BNG, such as wildflower meadows, tree planting, hedgerow planting, optimising the ecological value of SuDs.</p>	<p>Wainhomes; White Horse Country Club Ltd; Martin Grant Homes; Hannick Homes; Cooper Estates; Quidhampton Developments Ltd; Barratt Homes and Vistry; Savills on behalf of Waddeton Park Ltd; Savills on Behalf of Barratt Group; Ludgershall Homes; Wadworth and Co. Ltd; Richborough Estates; Savills on behalf of Backhouse Housing; Savills on behalf of Miller Homes; Society of Merchant Venturers.</p>

Key issues raised (Policy 88 - Biodiversity and geodiversity)	Respondent(s)
<b>Viability:</b> Whilst it appears that costs have been reflected in the LPA's viability work, there remains a need for them to be considered in the round with other developer contributions, including those that are currently uncoded (i.e. the transport strategies).	Bloor Homes.
<b>Incompatible with other methods of construction:</b> The (MoD) is also targeting modern methods of construction as a key innovation to facilitate more sustainable development. Some of the mandatory requirements for nest bricks and nesting sites on buildings may be inappropriate for certain methods.	Defence Infrastructure Organisation.
<b>Native planting:</b> The 'native planting' feature should be within the 'As a Minimum' section.	Environment Agency.
<b>Swift/nesting bricks - extensions and non residential development:</b> The 'Biodiversity in the built environment' section bullet point no.1 covers new-build residential developments but it also need to cover extensions to residential dwellings and large non-residential buildings.	Swifts Local Network: Swifts & Planning Group; Salisbury & Wilton Swift Group And North Wiltshire Swifts.
<b>Nutrient Neutrality</b>	
<b>Policy for nutrient neutrality:</b> Section 5.127 includes text about nutrient neutrality. This requirement must be included for all policies that involve development in the Hampshire Avon catchment. Suggested an overarching policy that addresses Nutrient Neutrality or Water Quality (incorporating nutrient neutrality) should be included within Local Plan. Much of Wiltshire is covered by the Hampshire Avon catchment, therefore it would seem proportional. It would need to summarise and reference the Hampshire Avon Nutrient Management Plan. Alternatively, the wording in Policy 88 could be expanded and strengthened to include a sub section about nutrients.	Environment Agency.
<b>Nutrient neutrality solutions need clarity:</b> Solutions to facilitate development need to be clearer. The local plan is not clear enough on how strategic solutions to Nutrient Neutrality constraints will be identified, which would then enable delivery of much needed housing in related constrained areas.	Gaiger Bros.
<b>Mitigation strategies</b>	
<b>New Forest SPA SAC and Ramsar:</b> To improve the clarity and effectiveness of the Local Plan, it is suggested that further explanation is given as to how windfall developments within the 13.8km visitor catchment area will be expected to mitigate their recreational impacts on the New Forest SPA/SAC/Ramsar sites. This could be achieved through additional wording in the supporting text to Policy 88 stating that all development within the 13.8km visitor catchment area will be required to fully mitigate/address their recreational impacts in accordance with Wiltshire's New Forest Mitigation Strategy and provide a summary of the proposed approach, and a link to the updated Wiltshire Council New Forest Mitigation Strategy document.	New Forest District Council.
<b>MOD</b>	

Key issues raised (Policy 88 - Biodiversity and geodiversity)	Respondent(s)
<p><b>Inappropriate for health and safety reasons:</b> There are sites where enhancing the biodiversity present is inappropriate for health and safety reasons, for example where fixed or rotary wing aircraft are used. There is a need for bespoke wording for the MOD.</p>	<p>Defence Infrastructure Organisation.</p>
<p><b>National Landscapes</b></p>	
<p><b>Nature Recovery Plans:</b> The North Wessex Downs / Cranborne Chase have produced a nature recovery plan, these should be utilised by the LPA and drawn upon in the policy.</p>	<p>North Wessex Downs AONB; Cranborne Chase Area Of Outstanding Natural Beauty.</p>
<p><b>Biodiversity in Development Position Statement:</b> The Cranborne Chase produced its own Biodiversity in Development Position Statement in May 2022 aimed at both filling the gap between the implementation of government aspirations and covering biodiversity gains in development excepted from the government's proposals. Cranborne Chase expects that to be implemented by the partner LPAs in this AONB.</p>	<p>Cranborne Chase Area Of Outstanding Natural Beauty.</p>
<p><b>Contributions to management:</b> The policy includes the intention that 'Development proposals affecting local sites must make a reasonable contribution to their favourable management in the long-term.' Given this precedent, and the importance of National Landscapes, this principle should be applied to National Landscapes.</p>	<p>Cranborne Chase Area Of Outstanding Natural Beauty.</p>
<p><b>Cotswold Water Park</b></p>	
<p><b>Cotswold Water Park strategy:</b> Given Wiltshire Scullers proposed strategy for Countywide sport with rowing being the kick starter for a number of other sporting opportunities and potential for lakes to host such sports it is strongly urged that the Cotswold Water Park strategy be revisited rather than deleted.</p>	<p>Wiltshire Scullers.</p>
<p><b>Site Specific Concerns</b></p> <p><b>(note, site specific concerns submitted against policy 88 have been summarised here but detailed consideration of the key issues raised for these site allocations can be found in the relevant site allocation policy table)</b></p>	
<p><b>Policies 27 (Land South of Harnham) &amp; 28 (Land West of Coombe Road):</b> Concerns regarding the impact of developing these sites upon biodiversity and the fact that developing these sites may not accord with the intentions of policy 88. Concerns were similarly raised with regards why policies 27 and 28 require only 10% biodiversity net gain for Sites 8 and 9, while Policy 89 mandates 20%?</p>	<p>Individuals x50.</p>
<p><b>Policy 53 (Land North-East of Hilperton):</b> Concerns regarding Policy 53 proposes development in an ecologically sensitive area, in a yellow zone for rare bats, which is not in accordance with Policy 88. The area North East of Hilperton needs the same protection as afforded to special areas of conservation in the rest of Wiltshire. It would be inappropriate for development to mitigate impacts off site given the value of the habitats present on site.</p>	<p>Hilperton Parish Council with Hilperton Area Action Group; Individuals x10.</p>

Table 5.108 [Policy 89 - Biodiversity net gain] key issues

Key issues raised (Policy 89 - Biodiversity net gain)	Respondent(s)
<b>Support 20% BNG</b>	
Support 20% BNG: Conditional support lodged for Policy 89 / 20% BNG.	Calne Without Parish Council; Environment Agency; Chippenham Town Council; New Forest National Park Authority; North Wessex Downs AONB Partnership; Individuals x10; Wildlife Trust; Chippenham Town Council; Warminster Town Council.
<b>20% BNG viability / justification</b>	
<p><b>No justification for 20% BNG:</b> Wiltshire Council have provided no justification / evidence / the justification is unclear for this increased targeted (from 10% to 20% BNG). Policy supporting text provides no further information in this regard. This represents a potential to restrict / compromise the delivery sustainable development, being overly onerous and impacting development viability. There needs to be clear evidence underpinning the justification behind this policy.</p>	<p>Castlewood Venture Partnerships; Martin Grant Homes; Gleeson Land; Hannick Homes; Home Builders Federation; South West Housing Association Planning Consortium; Ludgershall Homes Ltd; Richborough Estates; Miller Homes; Society of Merchant Venturers; Brimble Lea; Melksham Town Council; Bloor Homes; L&amp;Q Estates; Wainhomes; St Philips Land Ltd; Hills Homes; Persimmon Homes; Gladman; Defense Infrastructure Organisation; Cooper Estates; Quidhampton Developments Ltd; Barratt Homes and Vistry; Barratt David Wilson Homes; Hallam Land Management; Waddeton Park Ltd; Barratt Homes Group; Barwood Land; L&amp;Q Estates; Woodhouse Developments; Land Value Alliances; Turley; Urchfont LVA LLP; Dilton Marsh LVA LLP; LPC Trull Ltd; Cotswold Ecohomes Ltd; Acorn Property Group; Robert Hitchens Ltd; Hills Homes Developments Ltd; Redrow Homes; GLP; Steven Graver Ltd; Mac Mic Group; Wadworth and Co. Ltd; Backhouse Housing; Impact Planning Services Ltd; Mathurst Ltd; The Stantonbury Building and Development Company; SW Group Logistics</p>

Key issues raised (Policy 89 - Biodiversity net gain)	Respondent(s)
	Ltd; L&Q Estates; St. Modwen Logistics (SML) & The Sealy Family Trust; Bellway Homes; Barwood Land; St. Modwen Logistics; White Horse Country Club Ltd; Cranborne Chase Area Of Outstanding Natural Beauty
<p><b>Viability and site capacity implications:</b> Potential for viability and site capacity implications for the 20% requirement if this policy is adopted in its current form. It is impossible to know what the cost of delivering net gain is until the base level of biodiversity on a site is known. Any requirement to demonstrate a net gain in excess of 10% should be subject to, and fully accounted for within, the viability assessment [some reps acknowledge the Local Plan viability assessment includes this and outlines the additional cost of £190 per dwelling. The Local Plan should be clear that 10% mandatory net gain cannot be subject negotiation as part of viability discussions but anything over 10% can be. Some consultee's pointed to DEFRA's impact assessment (2019) and the balanced conclusion that was reached (for 10%) when comparing 5-20%. Barwood Land noted further viability concerns should financial contributions also be required for SANG if this is in addition to 20% BNG delivery. Clarity is needed in this regard.</p>	<p>Mac Mic group; Hill Residential Ltd; David Wilson Homes; Leda Properties Ltd; Paul Bowerman Discretionary Trust and PH Bowerman Esq; Home Builders Federation; South West Housing Association Planning Consortium; Gleeson Land; Castlewood Venture Partnerships; Bloor Homes; L&amp;Q Estates; Hills Homes; Persimmon Homes; Gladman; Defense Infrastructure Organisation; Barratt Homes and Vistry; Barratt David Wilson Homes; Waddeton Park Ltd; Barratt Homes Group; Barwood Land; Woodhouse Developments; Turley; Urchfont LVA LLP; Dilton Marsh LVA LLP; LPC Trull Ltd; Barwood Land; Cotswold Ecohomes Ltd; LD &amp; PC Ltd; Robert Hitchens Ltd; Steven Graver Ltd; Wadworth and Co. Ltd; Impact Planning Services Ltd; Mathurst Ltd; The Stantonbury Building and Development Company; SW Group Logistics Ltd; L&amp;Q Estates; Bellway Homes; SREIT Property Ltd; Barwood Land; St. Modwen Logistics; Hallam Land Management; White Horse Country Club Ltd; McCarthy Stone Retirement Lifestyles Ltd.</p>
<b>Viability Assessment</b>	
<p><b>Unclear how cost per dwelling has been established:</b> Not clear how the estimate of £190 per dwelling has been established (greenfield, £57 per dwelling on brownfield sites). The cost per house is variable depending on the site circumstances. Biodiversity units generally cost £25,000-£35,000 but the number of dwellings these cater for is very scheme dependent. Government credits are much more expensive again, the cost of which</p>	<p>David Wilson Homes; Leda Properties Ltd; Paul Bowerman Discretionary Trust and PH Bowerman Esq; McCarthy Stone Retirement Lifestyles Ltd.</p>

Key issues raised (Policy 89 - Biodiversity net gain)	Respondent(s)
<p>were published on 27 July 2023. This publication has enabled it to be determined how much BNG may cost and it is considered that the costs per dwelling put forward within the Viability Assessment have greatly underestimated the costs, with brownfield site BNG costs often being more substantial than Greenfield but this very much depends on the site characteristics. £190 per dwelling is low, as this would only be £7600 per ha (assuming 40 dwellings per ha), which is unlikely to support significant net gains, therefore the cost should be increased in the viability work.</p>	
<p><b>Costs unknown:</b> How can the viability of more than 10% BNG can be established when the market for off-site credits, and therefore the costs of delivering the 10% mandatory BNG system are still emerging. Although the initial price of statutory credits is now known, this national fallback option has been deliberately highly priced to discourage their use, which whilst understandable, the lack of functioning local markets for off-site credits causes viability problems. Experience to date suggests any scheme that needed to rely on statutory credits would become unviable.</p>	<p>Home Builders Federation; Persimmon Homes; Gladman; Bloor Homes; L&amp;Q Estates; Bellway Homes; SREIT Property Ltd.</p>
<p><b>10-20% cost assumption must lower:</b> Section 6.2 (paragraphs 6.2.13 and 6.2.14) of the Viability Assessment refers only directly to the national 10% requirement and sets out estimated costs per unit on that basis for Greenfield (£1,000 per unit) and Brownfield (£300 per unit). These figures are only applied to the mandatory 10% net gain, the additional 10% increase in net gain is assessed on the basis of considerably lower costs assumptions. These being £190 per dwelling (greenfield) and £57 per dwelling on brownfield (see table 4-1 of Viability Report). The reasons for this are not adequately explained. It seems illogical to consider that costs for BNG in excess of the mandatory requirements would be considerably lower than costs associated within delivery the minimum 10% requirement. It is unclear therefore as to whether the 20% BNG requirement has been fully assessed through the entirety of the Viability Assessment.</p>	<p>Miller Homes; Society of Merchant Venturers; Persimmon Homes; Bloor Homes.</p>
<p><b>Use of existing examples for cost assumptions:</b> It is not clear why the Viability Assessment does not apply costs for off-site biodiversity which have been agreed for specific development schemes in Wiltshire as a basis for undertaking the viability review, or at the very least, applying this as sensitivity check to the cost assumptions relied upon in the Viability Assessment.</p>	<p>Persimmon Homes; Bloor Homes.</p>
<p><b>VA unclear on 20% BNG:</b> In the Viability Assessment it is not clear on the implications of factoring 20% BNG, the only reference appears to be in Table 8-17 and in Appendix B summary of Stakeholder Feedback. In Appendix C Draft Policy Review the impact of 20% BNG is shown to have a high impact on viability.</p>	<p>Robert Hitchens Ltd.</p>
<p><b>Deliverability of 20% BNG</b></p>	



Key issues raised (Policy 89 - Biodiversity net gain)	Respondent(s)
<p><b>20% BNG delivery needs to be flexible:</b> 20% BNG alongside other policy requirements need to be flexible on a site-by-site basis, and negotiable, to ensure site deliverability. 20% could be expressed as the goal towards which applicants would be encouraged and supported, rather than a formal minimum.</p>	<p>Mac Mic group; Hill Residential Ltd; David Wilson Homes; Leda Properties Ltd; Paul Bowerman Discretionary Trust and PH Bowerman Esq; Wyatt Homes; Acorn Property Group.</p>
<p><b>Acceptable in planning terms:</b> The delivery of 20% BNG should not be considered a requirement to make the development acceptable in planning terms (i.e., any provision in excess of the 10% figure should be considered an additional benefit of a proposed scheme). Requiring BNG above 10% does not meet the tests set out in paragraph 57 of the NPPF, a 10% requirement should be maintained in order to ensure that the requirement is 'fairly and reasonably related in scale and kind to the development'. It should be recognised that there is a policy distinction to made between the national mandatory requirements and any optional increased to this requirement.</p>	<p>Mac Mic group; Hill Residential Ltd; David Wilson Homes; Leda Properties Ltd; Paul Bowerman Discretionary Trust and PH Bowerman Esq; Persimmon Homes; McCarthy Stone Retirement Lifestyles Ltd.</p>
<p><b>Flexibility in delivering on / off site BNG:</b> Should be flexibility in any allocation requirement and/or policy to enable BNG to be achieved on-site, off-site or through combination of both. The DEFRA metric is weighted very much in favour of on-site provision already, but allows flexibility. Flexibility could include the suitability of the site to BNG delivery, LNRS priorities and the possibility of pooling BNG from other sites for landscape scale schemes. Necessitating on site could prejudice the ability to locate development in the most sustainable locations. Given the difficulty in obtaining land for off-setting, there should be more flexibility to do off site mitigation on land outside of a LNRS area. Otherwise disparity between the demand for land within Local Natural Recovery Strategy Areas and the supply of land in these areas could artificially inflate costs associated with delivering a net gain in biodiversity.</p>	<p>Mac Mic group; Hill Residential Ltd; David Wilson Homes; Leda Properties Ltd; Paul Bowerman Discretionary Trust and PH Bowerman Esq; Home Builders Federation; Bloor Homes; Barratt Homes and Vistry; Barratt David Wilson Homes; Waddeton Park Ltd; Barratt Homes Group; Robert Hitchens Ltd; Hills Homes Developments Ltd; Wadworth and Co. Ltd; Backhouse Housing; The Stantonbury Building and Development Company; St. Modwen Logistics (SML) &amp; The Sealy Family Trust; St. Modwen Logistics; McCarthy Stone Retirement Lifestyles Ltd.</p>
<p><b>On / off site BNG:</b> Policy wording should make it clear that on-site delivery is preferred to off-site and off-site should only be considered if all options for on-site have been exhausted.</p>	<p>Environment Agency.</p>
<p><b>Delivery in National Landscapes:</b> A case in support of delivering 20% BNG might be made for delivery within National Landscapes. More detail would be beneficial with regards how this should be delivered, it might be that credits and delivery in AONBs are given priority or 'score' more highly.</p>	<p>Cranborne Chase Area Of Outstanding Natural Beauty.</p>
<p><b>Supplementary guidance</b></p>	

Key issues raised (Policy 89 - Biodiversity net gain)	Respondent(s)
<p><b>Guidance required:</b> Guidance should be provided (or signposted), and would be welcomed, on how to practically achieve a higher biodiversity net gain in development.</p>	<p>South West Housing Association Planning Consortium.</p>
<p><b>Clarity needed on guidance approach [Policy opening paragraph]:</b> The policy outlines how “Development must achieve a minimum of 20% biodiversity net gain, or higher as stipulated in national legislation and/or policy or supplementary guidance....”. The wording of the policy is inaccurate and creates confusion, is the intention to give Local Plan policy weight to an SPD? Why is such guidance necessary? The reference to supplementary guidance is unclear as to whether this means national or local guidance. If this is the latter this is legally not compliant as the BNG requirement can only be set at the local level through the Local Plan.</p>	<p>Home Builders Federation; Miller Homes; Society of Merchant Venturers; Redrow Homes.</p>
<p><b>Policy wording / suggested amendments</b></p>	
<p><b>Bring policy in line with national legislation, guidance and policy:</b> The policy should be brought in line with the latest national policy, guidance and legislation and use the 10% biodiversity net gain figure. This includes referring to the latest statutory metric for BNG, including for small sites. The local policy must ensure it is consistent with national policy and legislation.</p>	<p>Castlewood Venture Partnerships; Mac Mic group; Hill Residential Ltd; Leda Properties Ltd; Paul Bowerman Discretionary Trust and PH Bowerman Esq; Gleeson Land; Home Builders Federation; Ludgershall Homes Ltd; Miller Homes; Society of Merchant Venturers; Brimble Lea; Bloor Homes; Wainhomes; St Philips Land Ltd; Hills Homes; Gladman; Defense Infrastructure Organisation; Barratt Homes and Vistry; Hallam Land Management; Waddeton Park Ltd; Barratt Homes Group; Acorn Construction Ltd; Barwood Land; L&amp;Q Estates; Woodhouse Developments; Land Value Alliances; Turley; Urchfont LVA LLP; Dilton Marsh LVA LLP; LPC Trull Ltd; Redcliffe Homes; Barwood Land; Redclife Homes on behalf of landowner x 3; Land Value Alliances; LD &amp; PC Ltd; Robert Hitchens Ltd; Hills Homes Developments Ltd; GLP; Steven Graver Ltd; Mac Mic Group; Wadworth and Co. Ltd; Backhouse Housing; The Stantonbury Building and Development Company; SW Group Logistics Ltd; Redcliffe homes on behalf of</p>

Key issues raised (Policy 89 - Biodiversity net gain)	Respondent(s)
	landowner; Barwood Land; Hallam Land Management; McCarthy Stone Retirement Lifestyles Ltd.
<p><b>Exempt development:</b> The requirement for exempted development to achieve no net loss and aspire to at least 20% net gain was resisted by some consultee's. Some suggested this wording should be removed from the policy and that this wording is unjustified and cannot apply to exempt development. BNG metric incorporates the principle of no net loss, so this does not need to be included within policy. A site cannot be exempt, and also required to deliver BNG; a site is either exempt in line with national guidance or it is not. The wording "aspiring to deliver at least 20% net gain" also appeared to cause confusion with some appearing to interpret this as introducing ambiguity with regards the flexibility of the 20% figure.</p>	Carter Jonas on behalf of David Wilson Homes; Carter Jonas on behalf of Leda Properties Ltd; Carter Jonas on behalf of Paul Bowerman Discretionary Trust and PH Bowerman Esq; Home Builders Federation; Richborough Estates; Gladman; Defense Infrastructure Organisation; Stantec on behalf of Barratt David Wilson Homes; Robert Hitchens Ltd; Redrow Homes.
<p><b>Unit / credit terminology [point 4 of policy]:</b> Point 4 of Draft Policy 89 "through the purchase of an appropriate amount of national biodiversity units/credits" should be reworded to remove units as these will be statutory credits. Ensure policy is clear on the use of terminology around credits and units.</p>	David Wilson Homes; Leda Properties Ltd; Paul Bowerman Discretionary Trust and PH Bowerman Esq; Home Builders Federation; Barratt David Wilson Homes; Robert Hitchens Ltd.
<p><b>Qualified ecologist:</b> The requirement for the "assessments underpinning / the Biodiversity Gain Plan to be undertaken by a suitably qualified ecologist and be submitted together with baseline and proposed habitat mapping in a digital format with the application" should be reviewed to differentiate between major and minor applications, where the latter's assessments can be carried out by an individual who does not have to be an ecologist, unless the site contains semi-natural habitats.</p>	David Wilson Homes; Leda Properties Ltd; Paul Bowerman Discretionary Trust and PH Bowerman Esq; Barratt David Wilson Homes.
<p><b>Annual monitoring reports:</b> There is reference to "Annual monitoring reports detailing the sites condition must be submitted to the council each year over this period". This is onerous for both the developer and the Council and should be revised / not required given this will be set out in national guidance / legislation. The Council should consider the submission of a monitoring report at decreasing frequency as the 30 year period runs, given the higher risk of failure in the early stages of establishment and need for closer and more adaptive management notwithstanding force majeure events.</p> <p>[1 individual supported the need for annual monitoring reports financed by the developer]  [Wildlife Trust outlined how the Local Plan currently does not outline how BNG sites will be captured or the long-term protection beyond the 30-year management commitment.]</p>	David Wilson Homes; Leda Properties Ltd; Paul Bowerman Discretionary Trust and PH Bowerman Esq; Martin Grant Homes; Hannick Homes; Miller Homes; Society of Merchant Venturers; Bloor Homes; Cooper Estates; Quidhampton Developments Ltd; Barratt Homes and Vistry; Barratt David Wilson Homes; Waddeton Park Ltd; Barratt Homes Group; Wadworth and Co. Ltd; Backhouse Housing; St. Modwen Logistics (SML) & The

Key issues raised (Policy 89 - Biodiversity net gain)	Respondent(s)
	Sealy Family Trust; St. Modwen Logistics; White Horse Country Club Ltd; McCarthy Stone Retirement Lifestyles Ltd.
<p><b>Deliberate degradation of habitats:</b> The policy states that “<i>where there is evidence of neglect or damage to any of the habitats on development sites reducing their biodiversity value their deteriorated condition will not be taken into consideration and steps will be taken to establish the previous ecological baseline of the site in order to decide the acceptability of any development proposals.</i>” The wording of this section may prove confusing so clarity would be beneficial to make readers aware this relates to deliberate degradation of a site’s baseline value not carried out in accordance with planning permission after 30th January 2020, in line with the Environment Act 2021. Currently, it reads as though it relates to the post-construction phase.</p>	David Wilson Homes; Leda Properties Ltd; Paul Bowerman Discretionary Trust and PH Bowerman Esq; Barratt David Wilson Homes.
<p><b>Biodiversity Net Gain Plan:</b> The Council requires a Biodiversity Gain Plan to be submitted ‘at the application stage’. This seemingly conflicts with ‘The biodiversity gain plan: draft template and guidance’ which was published by Department for Environment, Food &amp; Rural Affairs on 26 October 2023 and confirms that the Biodiversity Gain Plan should be submitted as a post-permission document.</p>	Miller Homes; Society of Merchant Venturers.
<p><b>In perpetuity / 30 years:</b> The Policy either needs to consistently refer to the management period being a minimum of 30 years, or the Plan needs to define the term perpetuity to be a minimum of 30 years. Requiring sites to be retained into perpetuity for BNG goes beyond the Environment Act 2021 and a minimum of 30 years figures should be used instead.</p>	Bloor Homes; McCarthy Stone Retirement Lifestyles Ltd.
<p><b>Concept plans:</b> Concept Plans prepared in support of allocations within the Local Plan do not contain specific details related to BNG or demonstrate how this policy requirement has been considered when setting out the ‘principles’ which are a feature and intended function of Concept Plans that support each allocation.</p>	Persimmon Homes; Bloor Homes.
<p><b>Sustainability Appraisal 10% BNG:</b> Sustainability Appraisal assesses development sites based on 10% BNG.</p>	Hills Homes Developments Ltd.
<p><b>National Landscape nature recovery plan:</b> The North Wessex Downs has produced a nature recovery plan, these should be utilised by the LPA and drawn upon in the policy.</p>	North Wessex Downs AONB Partnership.
<b>Enforcement and monitoring</b>	
<p><b>How will this be monitored and enforced:</b> It is not clear how enforceable measures within the policy will be, how monitoring of biodiversity enhancements will take place nor how long term funding of maintenance will be secured.</p>	Sustainable Calne.
<b>Site specific concerns</b>	

Key issues raised (Policy 89 - Biodiversity net gain)	Respondent(s)
(Note, site specific concerns submitted against Policy 89 have been summarised here but detailed consideration of the key issues raised for these site allocations can be found in the relevant site allocation policy table)	
<b>Policies 27 (Land South of Harnham) &amp; 28 (Land West of Coombe Road):</b> The Local Plan contradicts itself and asks for 10% BNG in some instances (for instance for site allocations within policies 27 and 28) yet policy 89 outlines a need to provide 20% BNG.	Individuals x10.

**Table 5.109 [Policy 90 - Woodland, hedgerows, and trees] key issues**

Key issues raised (Policy 90 - Woodland, hedgerows, and trees)	Respondent(s)
<b>Policy support</b>	
<p><b>Policy support:</b> Conditional support and welcome that planning policy recognises the importance of Wiltshire’s woodland, ancient trees and hedgerows both ecologically and in terms of landscape, history and for climate resilience. Notes of support were voiced with regards the emphasis within the supporting text on the provision of urban street trees, the attention given to supporting the Great Western Community Forest and creating and expanding woodlands that can be easily accessed by more people. It was also welcomed the policy outlined the importance of delivering the right trees are delivered in the right place.</p>	<p>Natural England; Catesby Estates; Chippenham Town Council; Calne Without Parish Council.</p>
<b>Policy wording</b>	
<p><b>Need for necessary loss of woodland, hedgerow and trees and greater policy flexibility [Policy 90 opening paragraph and paragraph 5.145]:</b> Policy wording needs to be clear and unambiguous to allow for the loss, where necessary, of woodland, hedgerow and trees, as it is in the supporting text (para. 5.145) to ensure this is not a barrier to site delivery. Currently the requirement that major development proposals make provision for the retention of woodland, hedgerows and trees is inflexible and too onerous given not all trees, woodlands and hedgerows are worthy of retention.</p> <p>There is no reference in the NPPF to trees and hedgerows which are not given ancient or veteran status and therefore it is disproportionate to require every major development to retain and enhance all hedgerows and trees. Consequently, as currently drafted, Policy 90 and its supporting text is not, in the terms of para. 16(d) of the NPPF, clear and unambiguous as to how a decision maker should react to such a scheme. It is therefore inconsistent with national planning policy and, as such, is unsound. Paragraph 131 of the NPPF allows flexibility to replace low quality trees, woodlands and hedgerows with new and enhanced planting. It may not be appropriate to deliver large amounts of new tree and hedgerow planting (as is the indication of Policy 90) as part of some developments due to, for example, site constraints and the character of the locality.</p>	<p>Bloor Homes; St Philips Land Ltd; Persimmon Homes; White Horse Country Club Ltd; Martin Grant Homes; Gleeson Land; Hannick Homes; Cooper Estates; Quidhampton Developments Ltd; Barratt Homes and Vistry; Barratt Homes; Wadworth and Co. Ltd; Backhouse Housing Ltd; L&amp;Q Estates; St Modwen Logistics And The Sealy Family Trust; Bellway Homes.</p>
<p><b>Only major development [Policy 90 first paragraph]:</b> It is not clear why Policy 90 only applies to major development proposals. Smaller-scale development can impact on such features and contribute to the wider objectives which sit behind this policy. Larger sites may be more capable of mitigation than smaller sites and this approach seems unjustified.</p>	<p>Persimmon Homes; Bloor Homes; Cranborne Chase Area Of Outstanding Natural Beauty.</p>
<p><b>Fruit trees [Paragraph 5.150]:</b> The requirement for fruit trees and garden tree planting is not a requirement of national planning policy. Subsequently the requirement for these to be included within gardens should be removed and appears unjustified.</p>	<p>Bloor Homes.</p>

Key issues raised (Policy 90 - Woodland, hedgerows, and trees)	Respondent(s)
<p><b>Mitigation hierarchy:</b> This policy should align with the mitigation hierarchy as set out in Policy 88 and Paragraph 180a of the NPPF. Wording should be included in the policy that requires mitigation to be provided where avoidance of impacts is not considered to be possible. It is recommended that a best practice approach would allow for a balancing mechanism within the policy, which would reflect the hierarchy used to balance harm to biodiversity – first avoidance, then mitigation, and finally compensation.</p>	<p>Bloor Homes; Turley on behalf of Woodhouse Developments (Amesbury) Ltd and Bloor Homes Ltd (Southern Region); Gleeson Land; Barratt Homes and Vistry; Barratt Homes; Wadworth and Co. Ltd; Backhouse Housing Ltd.</p>
<p><b>Woodland, hedgerow and tree strategy / climate strategy [Policy 90, criterion 1]:</b> Requires development to contribute to the tree planting target of Wiltshire Council's 'Climate Strategy and woodland, hedgerow and tree strategy'. No specific documents were published in support of the Regulation 19 consultation meaning it is not possible to consider whether such targets are justified or comment on the obligation this place on individual sites.</p> <p>The Wiltshire Council Climate Strategy encourages tree planting to enhance carbon capture, enhance biodiversity and to minimise carbon emissions by creating shading. However, it does not identify specific requirements in relation to the provision of trees as part of new developments. Consequently, such a requirement within Policy 90 is ambiguous and does not provide clarity for the decision makers and is inconsistent with paragraph 16d) of the Framework (and is therefore unsound in accordance with paragraph 35d).</p>	<p>Persimmon Homes; Bloor Homes; Gleeson Land.</p>
<p><b>Economy of woodland and tree planting [Policy 90 criterion 2]:</b> Unclear how criterion 2, which seeks to support the economics of woodland and tree planting, could apply to all major developments. Often the enclosure of open landscapes and open skies is overlooked in approaches to tree planting.</p>	<p>Cranborne Chase Area Of Outstanding Natural Beauty.</p>
<p><b>Combining / treating woodland, hedgerow and trees together:</b> Inappropriate to combine woodland, hedgerows and trees into a group given the nature of a woodland is very different from that of an individual tree or hedgerow.</p>	<p>St Modwen Logistics And The Sealy Family Trust.</p>
<p><b>Wilts &amp; Berks Towpath Challenge:</b> The policy should mention this major hedgerow project, the creation of 50km of towpath and associated hedgerow from Semington to Swindon.</p>	<p>Wiltshire Swindon &amp; Oxfordshire Canal Partnership.</p>
<p><b>Targets:</b> There needs to be specific targets for tree canopy coverage and standards set for tree replacement, and buffers to woodland. The policy does not contain tree planting triggers or criteria that will ensure major development makes a proportionate contribution to meeting targets.</p>	<p>Sustainable Calne; Calne Community Neighbourhood Plan Steering Group; Melksham Town Council.</p>
<p><b>Off site planting:</b> It may be worth including a provision for off-site tree planting, particularly in the case of brownfield sites where ground conditions may be inappropriate for extensive tree planting.</p>	<p>Cranborne Chase Area Of Outstanding Natural Beauty.</p>
<p><b>Policy implementation</b></p>	

Key issues raised (Policy 90 - Woodland, hedgerows, and trees)	Respondent(s)
<b>Hedgerow in property boundary:</b> How will the policy deal with situations where existing hedgerows are included as part of the private boundary of new residential properties which results in hedgerow removal as soon as the property is owned? Such hedges should be in the public realm.	Melksham Without Parish Council.
<b>Appropriate planting:</b> Tree planting should not take place right up against the boundary of rear gardens or where they result in damage to footways given the maintenance problems that arise.	Melksham Without Parish Council.
<b>Maintenance and delivery:</b> It is not clear how developers can be held to account to ensure that BS5837 is complied with along with other elements of the policy. For instance, measures must be in place to ensure that newly planted trees become established, through effective management (including monitoring, health checks and replacement), and existing trees and their root systems are protected in perpetuity. Future sustainable and effective woodland management works should take place, including allowing for access routes for forestry machinery. The Local Plan should be the place that sets out expectations in terms of maintenance, monitoring and enforcement.	Melksham Without Parish Council; Wiltshire Wildlife Trust; Cranborne Chase Area Of Outstanding Natural Beauty; Save Chippenham.
<b>Habitat creation:</b> Tree planting on its own will not achieve nature's recovery. Woodland creation should include other features such as ponds, glades and rides, which increase the resilience and biodiversity value of woodland. Scrub is also a vitally important habitat and should be given recognition within targets to achieve mature woodland blocks.	Wiltshire Wildlife Trust.
<b>Right tree, right place</b>	
<b>Right tree, right place [Paragraph 5.154]:</b> Paragraph 5.154 references this in relation to local, regional, national, and international designations. Concern raised with the justification for this requirement given the principles are established within the context of landscape which is designated or has statutory protections. The application of this 'standard' or principles would then apply throughout the county, irrespective of whether or not land has a specific designation or statutory protection.	Persimmon Homes; Gleeson Land; Bloor Homes.
<b>Right tree, right place (Local Nature Recovery Strategy):</b> Support the principle of right tree, right place but would recommend that the Council is specific that the policy of tree planting will be derived from the Local Nature Recovery Strategy or that the Council will commit to the development of a county tree strategy to ensure that existing non-wooded high value habitats will not be planted.	Wiltshire Wildlife Trust.
<b>Right tree, right place (Landscape character):</b> It is important that planting respects and supports landscape character and is not in conflict with it. Tree planting could be targeted within existing settlements and new developments.	Gleeson Land.



Key issues raised (Policy 90 - Woodland, hedgerows, and trees)	Respondent(s)
<p><b>Right tree, right place (Native trees):</b> Please include that native tree species of UK provenance will be used where possible. This is important to keep the right species present in the UK and encourage the right animal species into these environments. Soil conditions must also be taken into account. Consideration should also be given to selecting a species mix for the viability and perpetuity of the woodland offering resilience to climate change and tree pests and diseases.</p>	<p>Environment Agency; Melksham Without Parish Council; Wiltshire Wildlife Trust.</p>
<p><b>Site Specific Concerns (note, site specific concerns submitted against policy 90 have been summarised here but detailed consideration of the key issues raised for these site allocations can be found in the relevant site allocation policy table)</b></p>	
<p><b>Policy 53 (Hilperton):</b> Allocation contains many ancient hedgerows along ancient lanes and bridleways that are vitally important for the local wildlife.</p>	<p>Hilperton Parish Council With Hilperton Area Action Group.</p>
<p><b>South Chippenham:</b> Comments outlined questions with regards how site specific mitigation was going to be achieved with regards the impacts upon on site woodland, hedgerows and trees and the mitigation provided on site. For instance, ensuring mitigation is successful.</p>	<p>Save Chippenham.</p>

**Table 5.110 [Policy 91- Conserving and enhancing Wiltshire’s landscapes] key issues**

Key issues raised (Policy 91 - Conserving and enhancing Wiltshire’s landscapes)	Respondent(s)
<b>National policy</b>	
<b>Paragraph 177 NPPF:</b> Policy should make it clear that development also needs to meet the necessary tests as set out in NPPF para 177.	Natural England.
<b>Flexibility provided by paragraph 177 NPPF:</b> Policy does not, but should, embed within it the flexibility / internal balancing provided by para. 177 NPPF (2021) with regards the circumstances whereby development can occur in designated landscapes.	Mac Mic Group; Hill Residential Ltd; David Wilson Homes; Leda Properties Ltd; Discretionary Trust.
<b>Conserving and enhancing all landscapes, paragraph 174a NPPF:</b> Paragraph 174a of the NPPF only requires the conservation of ‘valued’ landscapes. Policy 91 exceeds these requirements by, in its current wording, requiring all landscapes to be conserved and enhanced. This wording threatens the deliverability of the plan and is not consistent with the framework and would preclude the vast majority, if not all development on greenfield land. The Landscape Institute guidance on visual impact advises that change to a natural landscape is, by definition, harmful. If this guidance is used for a landscape and visual impact assessment of a greenfield development then it will inevitably result in a conclusion that there is a degree of harm to the landscape.	White Horse Country Club Ltd; Martin Grant Homes; Gleeson Land; Hannick Homes; Cooper Estates; Barratt Homes and Vistry; Barratt Homes; Wadworth and Co. Ltd; Backhouse Housing Ltd; Miller Homes; St. Modwen Logistics (‘SML’) & The Sealy Family Trust; St. Modwen Logistics.
<b>Paragraph 176 NPPF:</b> Paragraph 176 of the NPPF states that <i>‘The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas’</i> . The wording of the draft Local Plan policy states <i>‘Development within, and influencing the setting of, these designated areas should be limited in scale and extent and are expected to contribute towards conserving and enhancing their natural beauty’</i> . It is evident that there is a conflict between the wording of the NPPF and the draft Local Plan policy in that the wording of the policy in the draft Local Plan is seemingly more restrictive in limiting the scale and extent of development that affects the setting of designated landscape areas. The NPPF only requires developments within their setting to <i>‘be sensitively located and designed to avoid or minimise adverse impacts’</i> but not limited in scale and extent (if the landscape harm can be mitigated). <i>[Alternative policy wording suggested by representors]</i>	Society of Merchant Venturers; Hallam Land Management Ltd.
<b>Not consistent with NPPF:</b> Local Plan is not consistent with national planning policy particularly with regards to policy that relates to National Landscapes and National Parks. More significance / weight should be afforded to the importance of National Landscapes given they cover 45% of the county and given the NPPF makes it clear that there are circumstances whereby great weight should be given to conserving and enhancing the landscape and scenic beauty of these protected landscapes and indeed to development that is located outside of the protected landscapes.	Cotswold National Landscape.

Key issues raised (Policy 91 - Conserving and enhancing Wiltshire's landscapes)	Respondent(s)
<b>Legislation</b>	
<p><b>Consistency with legislation [Paragraph 5.165]:</b> Paragraph 5.165 (Wiltshire's designated landscapes) should be further strengthened by including reference to the new duty to 'seek to further' the statutory National Park purposes placed on 'relevant authorities' (including neighbouring planning authorities) by the recently amended Section 11A of the National Parks &amp; Access to the Countryside Act 1949. <i>[Alternative policy wording suggested by representors]</i></p>	New Forest National Park Authority.
<p><b>Consistency with legislation [Paragraph 5.167]:</b> Paragraph 5.167 should be revised to reflect the amendment in section 245 of LU&amp;R Act 2023. This includes the strengthened legal duty to 'seek to further' the two statutory National Park purposes set out in section 11(A) of the National Parks &amp; Access to the Countryside Act 1949, as amended by the Levelling Up &amp; Regeneration Act 2023. Furthermore, in relation to the penultimate line, 'where possible' is not in the statute and, therefore, should be taken out of the supporting text of the Local Plan. <i>[Alternative policy wording suggested by representors]</i></p>	New Forest National Park Authority; Cranborne Chase Area Of Outstanding Natural Beauty.
<p><b>Adjoining landscapes:</b> Policy 91 currently largely focuses on development within Wiltshire Council's planning administrative area affecting National Landscapes. To ensure full legal compliance and consistency with the latest legislation, policy 91 should be amended to explicitly refer to the impacts of development in Wiltshire on the adjacent New Forest National Park. It currently only references the 'duty of regard' towards the statutory AONB purpose – which has also been strengthened by the Levelling Up &amp; Regeneration Act 2023 – but not the equivalent duty related to National Park purposes.</p>	New Forest National Park Authority.
<p><b>Countryside and Rights of Way Act 2000:</b> The local authority has not sufficiently fulfilled their statutory duty to have regard to the purpose of conserving and enhancing the natural beauty of AONBs, under Section 85 of the Countryside and Rights of Way Act 2000.</p>	Cotswold National Landscape.
<b>Mitigation</b>	
<p><b>Mitigation within National Landscapes:</b> Policy should be expanded to include provision for further moderating and compensating adverse impacts on nationally designated landscapes through appropriate offsite measures (e.g., financial contributions delivering projects that help meet the objectives of the designated landscape's management plan).</p>	Natural England.
<b>Landscape Character Assessment / Landscape Strategy</b>	

Key issues raised (Policy 91 - Conserving and enhancing Wiltshire's landscapes)	Respondent(s)
<p><b>Need for up to date assessments / strategies:</b> It is notable that, despite the policy making reference to LCA/LS, the current Wiltshire Landscape Character Assessment was published in December 2005, 18 years ago. It is recommended that an up-to-date Landscape Character Assessment and Landscape Strategy is prepared to inform Policy 91 and the Local Plan overall. As paragraph 31 of the NPPF (2023) states, it is crucial that the Local Plan is underpinned by 'relevant and up-to-date evidence'.</p>	<p>Miller Homes; Society of Merchant Venturers; Hallam Land Management Ltd.</p>
<p><b>National Landscapes</b></p>	
<p><b>Separate National Landscape policy:</b> Attention was drawn to reference in the policy with regards '<i>development will conserve and where possible enhance Wiltshire landscapes</i>'. This is not sufficient as the purpose of the National Landscapes is to conserve AND enhance. Demonstrates that there should be a separate National Landscape policy rather than a standard landscape policy. Some representors (Preshute Parish Council) outlined the need for such a policy to have regard for the special characteristics of National Landscapes such as implementing the National Landscape management plans.</p>	<p>North Wessex Downs National Landscape; Preshute Parish Council.</p>
<p><b>Designated landscapes, specific policy wording needed:</b> Paragraph on designated landscapes in Policy 91 is too generalised it needs to set the scene which outlines considerations when assessing applications such as responding to local context, local distinctiveness, sense of place, dark skies as well as the setting of the AONB.</p>	<p>North Wessex Downs National Landscape.</p>
<p><b>National Landscape Management Plans:</b> The responsibility on developers to demonstrate that they have taken account of the objectives of the relevant National Landscape Management Plan is rarely undertaken in practice. Policy should be strengthened in this regard. It would also be appropriate to include that the National Landscape Management Plans are adopted by Wiltshire Council and are, statutorily, the Council's policies for the relevant National Landscape.</p>	<p>Cranborne Chase National Landscape.</p>
<p><b>Policy wording</b></p>	
<p><b>Neighbourhood plan design guidance [policy point 5]:</b> When referring to design guidance, neighbourhood planning design guidance should be included in the policy.</p>	<p>Salisbury City Council.</p>
<p><b>Conserving and enhancing all landscapes:</b> In requiring development to conserve and enhance Wiltshire's landscapes the policy is unrealistic, particularly with reference to the deliverability of development on greenfield sites, and goes well beyond the provisions of the NPPF, which only seeks to conserve valued landscapes. This conflicts with the intention and need to deliver sustainable development. The policy should be amended to relate only to valued landscapes, or to acknowledge the potential for mitigation to minimise impacts. This is in</p>	<p>White Horse Country Club Ltd; Martin Grant Homes; Gleeson Land; Hannick Homes; Cooper Estates; Barratt Homes and Vistry; Barratt Homes; Wadworth and Co. Ltd; Backhouse Housing Ltd; Miller Homes; Society</p>

Key issues raised (Policy 91 - Conserving and enhancing Wiltshire's landscapes)	Respondent(s)
reference to paragraph 174a) of the NPPF which only requires the conservation of 'valued' landscapes. Some representors outlined the possibility of making reference to enhancements "where possible". <i>[Alternative policy wording suggested by representors]</i>	of Merchant Venturers; St. Modwen Logistics ('SML') & The Sealy Family Trust; St. Modwen Logistics.
<b>Restoring landscapes [policy criteria 2]:</b> Criteria 2 within Policy 91 refers to 'restoring the characteristics and views of landscapes'. The NPPF (2023) (paragraphs 173-178) do not however include any requirement for developments to 'restore' the natural and local environment. This requirement is also considered to be very prescriptive. <i>[Alternative policy wording suggested by representors]</i>	Miller Homes; Society of Merchant Venturers.
<b>High quality design and policy duplication [policy criteria 5]:</b> Criteria 5 within Policy 91 sets out requirements for development to be of 'high-quality design...that incorporates green and blue infrastructure, supports climate resilience, biodiversity enhancement, and health and wellbeing of the local community'. These requirements are prescriptive and are also addressed however by other policies contained within the Local Plan Review. Paragraph 16 of the NPPF (2023) is clear that plans should avoid 'unnecessary duplication of policies'.	Miller Homes; Society of Merchant Venturers.
<b>Tranquillity:</b> The work done by CPRE needs updating, tranquillity is a special quality of protected landscapes and has been included in our [North Wessex Downs] adopted management plans. Tranquillity should form part of the LPAs developing landscape strategy and should go beyond simply light and noise. Tranquillity is significantly more than just those two elements. Leaving those words in place risks only those two aspects of tranquillity being addressed. Cranborne Chase note that the higher level work by, for example, CPRE was brought to a more local level by the Cranborne Chase so it is not right to give the impression in that paragraph that the topic is only covered at a strategic level.	North Wessex Downs National Landscape; Cranborne Chase National Landscape.
<b>Landscape-scale nature recovery / LNRS:</b> Policy 91 should specifically refer to the Local Nature Recovery Strategy and landscape-scale nature recovery to ensure such schemes are facilitated [National Trust]. There are certain priorities within Wiltshire, such as Lowland Meadows, Calcareous Grassland and Chalk Streams which will be set out within the LNRS that the policy should factor in whilst the policy should also recognise River catchments that are key features of Wiltshire's landscape having shaped the location and design of towns, villages and transport networks for centuries. <i>[Alternative policy wording suggested by representors]</i>	National Trust; Wiltshire Wildlife Trust.
<b>Natural Beauty:</b> In relation to National Landscapes, Policy 91 should explicitly refer to conserving and enhancing natural beauty. This would bring the wording more in line with the statutory purpose of National Landscape designation, which is to conserve and enhance the natural beauty of the National Landscape. Other relevant considerations can be referred to but these should be under the umbrella of 'natural beauty'. <i>[Alternative policy wording suggested by representors]</i>	Cotswold National Landscape.

Key issues raised (Policy 91 - Conserving and enhancing Wiltshire's landscapes)	Respondent(s)
<p><b>Landscape buffers between settlements / strategic countryside gaps [Para. 5.156]:</b> Local Plan speaks to the erosion of the separate identify of settlements and their coalescence, character, visual and functional amenity, which can degrade their setting to the detriment of the character of the rural countryside. This does not go far enough and should be designating the landscape buffers between settlements. The policy should reference the need to avoid coalescence and fails to identify strategic countryside gaps. This cannot be done at NHP level (as you suggest in 5.161) as this is a strategic planning matter.</p>	<p>Melksham Without Parish Council; Melksham Town Council.</p>
<p><b>World Heritage Site:</b> World Heritage Site not mentioned in this Policy but was in Core Policy 51 alongside National Landscapes. This should be included within the landscape policy.</p>	<p>Stonehenge &amp; Avebury WHS Coordination Unit.</p>
<p><b>Sufficiently prominent:</b> Reference to "sufficiently prominent" development outside National Landscape is too vague and will lead to inconsistent decision-making.</p>	<p>Brimble Lea.</p>
<p><b>Development impacting setting of National Landscape:</b> The policy should be modified so that it requires proposals for <u>major</u> development outside of an National Landscape to demonstrate that it would not adversely affect its setting. Proposals for minor development that may affect the setting of an National Landscape should be considered on a site-by-site basis through the development management process.</p>	<p>Brimble Lea.</p>
<p><b>Focus too much on designated landscapes:</b> Focus is clearly on designated areas. More specific protection for other landscapes and regions are also needed.</p>	<p>Calne Community Neighbourhood Plan Steering Group.</p>
<p><b>GLVIA 3<sup>rd</sup> edition:</b> GLVIA 3rd edition is a respected and inquiry tested approach to LVIAs, based upon a good understanding of landscape character. Whilst there may be little by way of alternative guidance for undesignated landscape and townscapes, the LI Technical Notes referred to in paras 5.162 and 5.163 do not have the benefit of that extensive external evaluation.</p>	<p>Cranborne Chase National Landscape.</p>
<p><b>Special Landscape Areas</b></p>	
<p><b>Objection to deletion of policies related to Special Landscape Areas:</b> Deletion of such policies (e.g., Policy C3 - Special Landscape Areas) will be detrimental to these landscapes. This deletion does not reflect the importance of these landscapes. Such policies should not be deleted until the Local Plan can be evaluated against the Emerging Landscape Strategy.</p>	<p>Bratton Parish Council.</p>
<p><b>Impact from traffic</b></p>	

Key issues raised (Policy 91 - Conserving and enhancing Wiltshire's landscapes)	Respondent(s)
<p><b>Has impact from traffic been considered:</b> It is not clear whether the draft Local Plan has taken into consideration the potential increase in traffic movements on roads through, or directly adjacent to, the four protected landscapes that would result from the proposed allocations (including those allocations that are located outside of the protected landscapes). As a rule-of-thumb, traffic increases of more than 10% in protected landscapes should be considered significant.</p>	Cotswold National Landscape.
<p><b>Site Specific Concerns</b></p>	
<p><b>Policies 27 (Land South of Harnham) &amp; 28 (Land West of Coombe Road):</b> Concerns were raised in relation to the landscape impacts (e.g., tranquillity, impacts upon the nearby National Landscape, impacts upon Ebbles Valley, impact upon dark skies) of developing sites within policy 27 (Land South of Harnham) and policy 28 (Land West of Coombe Road). Representors outlined a need to conserve this greenfield site and associated landscape character and how development here was contrary to both national and local plan policy.</p>	Individuals x50.
<p><b>Malmesbury (Site Mal4 – Land off Park Lane and Sherston Close):</b> Council's Site Landscape Appraisal identifies that housing development here would have a moderate adverse effect in relation to landscape objectives, primarily in relation to CNL considerations. This should be considered significant and the allocation (and therefore the Plan) would fail to conserve and enhance the natural beauty of the CNL, including its landscape and scenic beauty.</p>	Cotswold National Landscape.

Table 5.111 [Policy 92 - Conserving and enhancing dark skies] key issues

Key issues raised (Policy 92 - Conserving and enhancing dark skies)	Respondent(s)
<b>Policy support</b>	
<b>Policy support:</b> Conditional support for the policy.	Natural England; Wiltshire Wildlife Trust; Elected member, Wiltshire Councillor; Calne Without Parish Council; Tisbury Parish Council; Individual x10.
<b>Policy wording</b>	
<b>Impact of building design and materials:</b> There does not appear to be any guidance on building designs to reduce light pollution. Light pollution can be reduced not only by reduced lighting/positioning but also building designs and materials. This needs to be addressed within the supporting text. For example, guidance on rooflights, floor to ceiling glazing, blinds/louvres low transmittance glass.	North Wessex Downs National Landscape; Cranborne Chase National Landscape.
<b>Strengthen policy to account for light sensitive species:</b> Dark skies are important for several bat species. Bat mitigation should be incorporated into the local plan more widely (other than Trowbridge) and state that all sustainable development should include modifications to lighting schemes within the design to become more bat-friendly.	Wiltshire Wildlife Trust.
<b>Retention of International Dark Sky Reserve status:</b> It should be mentioned within the policy that in order to retain this extremely important designation light pollution must be reduced, thus making it even more important to control light pollution.	Elected member, Wiltshire Councillor.
<b>Article 4 direction:</b> No mention is made of existing development having permitted development rights and thus being able to introduce light pollution features at any point in the future. In order to help retain the IDSR designation, an Article 4 Direction on the whole of the Cranborne Chase (and any other AONB if thought appropriate) should be introduced removing permitted development rights for external lighting and the introduction of other light polluting features.	Elected member, Wiltshire Councillor.
<b>Targets:</b> The policy includes no targets for reducing light pollution except areas designated dark sky areas. This could be broadened out to include other areas around Wiltshire that could benefit from such measures.	Calne Community Neighbourhood Plan Steering Group; Melksham Town Council.
<b>County wide policy application:</b> Representor outlined the need for such a policy, and associated intentions, to be county wide. Notably to control lights such as floodlights, car park illumination and street lights.	Individual x10.



Key issues raised (Policy 92 - Conserving and enhancing dark skies)	Respondent(s)
<p><b>World Heritage Site:</b> Policy should include the World Heritage Site alongside other designated areas. Wording should include the need to monitor lighting provision of development and highways schemes within the World Heritage Site and its setting to minimise individual and cumulative light pollution to preserve and enhance Attribute 4 of Outstanding Universal Value (OUV): the design of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the skies and astronomy.</p>	<p>Stonehenge &amp; Avebury WHS Coordination Unit.</p>
<p><b>Policy insufficient</b></p>	
<p><b>Does not cover Wiltshire Councils duty:</b> The policy is laudably succinct, but it does not cover the Council's responsibility to reduce light pollution. CCAONB advises adding, 'The Council will seek to reduce light pollution and lead by example modifying existing lighting to achieve good lighting criteria when the opportunities arise.'</p>	<p>Cranborne Chase National Landscape.</p>
<p><b>Site Specific Concerns</b></p>	
<p><b>Policies 27 (Land South of Harnham) &amp; 28 (Land West of Coombe Road):</b> Concerns regarding the impact of developing these sites upon the dark skies / tranquillity present within the nearby (circa 1km) National Landscape / dark sky reserve (Cranborne Chase Dark Sky Reserve). This is in the context that these are currently greenfield sites emitting no light pollution and will be readily visible from the designated dark sky reserve. Concern was also raised with regards how this impact has been assessed to inform the allocations in terms of the principle of allocating these sites and the associated mitigation.</p>	<p>Individuals x20.</p>

Table 5.112 [Policy 93 Green and blue infrastructure] key issues

Key issues raised (Policy 93 - Green and blue infrastructure)	Respondent(s)
<b>Policy support</b>	
<b>Policy support:</b> Conditional support for the policy.	Calne Without Parish Council; Miller Homes; Society of Merchant Venturers; Catesby Estates; Natural England.
<b>Policy wording</b>	
<b>Policy contradiction between retention, enhancement and unavoidable harm [policy bullet 1]:</b> Bullet point 1/parts of the policy conflict with the penultimate paragraph which allows for loss/damage of Green and Blue Infrastructure (GBI) where it is unavoidable.	Bloor Homes; Wadworth and Co. Ltd; Backhouse Housing Ltd.; Barratt Homes and Vistry; Barratt Homes Group; St Modwen Logistics; St Modwen Logistics and the Sealy Family.
<b>Retention and enhancement of GBI conflicts with greenfield development [policy bullet 1]:</b> Bullet point 1 requires development to retain and enhance the quantity of GBI. Given the Local Plan's reliance on greenfield sites, this threatens the deliverability of sites as the provision of any built form on a greenfield site could conflict with Policy 93 as currently worded.	Gleeson Land; White Horse Country Club Ltd; Martin Grant Homes; Hannick Homes; Cooper Estates; Quidhampton Developments Ltd.
<b>Relationship with other policies [policy bullet 1 and 2]:</b> Bullet points 1 and 2 should incorporate references to the ecological-mitigation hierarchy, the Local Nature Recovery Strategy and to biodiversity net gain in order to correlate with Policies 88 and 89.  The Environment Agency similarly outlined the policy should be linked with Policy 89 and vice versa. They will be stronger together as policy 89 is all about making sure there is the least amount of harm and replacement with the same or better quality.	Bloor Homes; Persimmon Homes; Gleeson Land; Environment Agency.
<b>European site mitigation [policy bullet 1 and 2]:</b> Bullet points 1 and 2 should incorporate reference to provision of green infrastructure linked to European Site mitigation, where applicable, as set out in Paragraph 5.124.	Bloor Homes; Woodhouse Developments (Amesbury Ltd.).
<b>Public rights of way [policy bullet 5]:</b> Bullet point 5 give no scope for the stopping up and diversion of public rights of way where this may be necessary in order to enable development to be carried out, in accordance with the provisions of planning and highway law. An amendment is required to address this.	Robert Hitchens Ltd.
<b>Damage or loss paragraph too prescriptive [penultimate policy paragraph]:</b> The penultimate paragraph is overly prescriptive and should be amended.	Wadworth and Co. Ltd; Backhouse Housing Ltd; Barratt Homes and Vistry; Barratt Homes Group.

Key issues raised (Policy 93 - Green and blue infrastructure)	Respondent(s)
<p><b>GBI assets value [Paragraph 5.184 and 5.192]:</b> Paragraph 5.184 should also mention that dedicated linear green routes are essential for providing access to important local community services. Similarly the benefits included in paragraph 5.192 could be integrated into paragraph 5.184 and expanded to include the value of linear GBI networks in providing an alternative to car use, active travel and associated benefits.</p>	Salisbury Area Greenspace Partnership.
<p><b>Natural England's Green and Blue Infrastructure Framework</b></p>	
<p><b>Include Natural England's Green and Blue Infrastructure Framework:</b> It is advised that applying or adopting the most relevant standards in NE's Green Infrastructure Framework could make a difference to the delivery of aspirations for place-making and the multi-functional benefits that are sought, particularly for key growth locations.</p>	Natural England.
<p><b>Biodiversity Net Gain (BNG)</b></p>	
<p><b>Link to BNG need to be clarified:</b> Policy 93 is not sound as it is not effective, justified or consistent with national policy as it is unclear how the policy fits into the policies on BNG - the BNG metric covers water courses, and as such require development affecting water courses to deliver improvements. Further clarity is required.</p>	Home Builders Federation; Terra Strategic Ltd.
<p><b>Funding / maintenance</b></p>	
<p><b>Contributions from all developments:</b> With regard to the policy's application to major development, it is suggested that the requirements for contributions towards GBI should be applicable to all developments, not just major developments.</p>	Melksham Town Council.
<p><b>Allowance for off site contributions:</b> Provision should be made in the policy for instances where creation of new/replacement GBI is not possible (e.g. reasons of viability or site-specific constraints), allowing for contributions for off-site GBI creation.</p>	St Modwen Logistics; St Modwen Logistics and the Sealy Family.
<p><b>Concern about future funding:</b> Concern that funding for maintenance of new green and blue infrastructure will fall to residents through management company costs. The policy should require a 20 year maintenance fee for new developments.</p>	Individuals x10.
<p><b>Canals and rivers</b></p>	
<p>Canal restoration projects funding: Canal restoration projects will meet many of the requirements listed in Policy 93 for major developments, and therefore canal restoration projects should be the recipient of developer contributions to GBI.</p>	Wilts & Berks Canal Trust.
<p><b>Engagement / partnership working</b></p>	

Key issues raised (Policy 93 - Green and blue infrastructure)	Respondent(s)
<p><b>Partnership working to delivery outcomes:</b> The policy/supporting text should include greater reference/commitment to working in partnership with landowners and environmental charities do deliver green and blue infrastructure commensurate with housing/employment growth. For example National Trust, RSPB, Natural England, Wessex Rivers Trust, and Wiltshire Wildlife Trust alongside other partnerships and initiatives operating in Wiltshire such as the Wiltshire Chalk Partnership (and by association Big Chalk), and the Forest of Selwood charity.</p>	National Trust.
<b>GBI Settlement Frameworks</b>	
<p><b>Unacceptable lack of GBI Settlement Frameworks:</b> There is an unacceptable lack of GBI Frameworks for principal settlements, which should be critical in context of climate crisis, biodiversity loss and public health. The lack of progress on these calls into question the fundamental soundness of the Local Plan.</p>	Salisbury Area Greenspace Partnership.

Table 5.113 [Policy 94 - Wiltshire's canals and the boating community] key issues

Key issues raised (Policy 94 Wiltshire's canals and the boating community)	Respondent(s)
<b>Policy support</b>	
<b>Policy support:</b> Conditional support for the policy. Support included support for the new links proposed to restore waterways and the acknowledgement the policy provides with regards the opportunity canal restoration represents in terms of GBI and ecological networks.	Natural England; Calne Without Parish Council; Sustrans; Wessex Waterways Restoration Trust.
<b>Melksham Link:</b> Support noted in the context of the policy accounting for concerns in relation to the Melksham Link canal restoration project.	Environment Agency.
<b>Policy wording</b>	
<b>Chippenham and Calne branches:</b> Add for completeness after “North Wilts Branch” the other branches, being the Chippenham and Calne Branches, where referred to within the policy and supporting text.	Wilts & Berks Canal Trust.
<b>Policy point 1:</b> <i>“not permitting development likely to destroy the canal alignment or its associated structures;”</i> This may be read as primarily protecting the remaining historic canal and its structures for their heritage value but it should also protect all the restored route.	Wilts & Berks Canal Trust.
<b>Suitable alternative alignment:</b> Where an alternative alignment is proposed additional technical complexity, additional costs and risk must be considered when making an assessment of a “suitable alternative alignment” and not just the available space for the alignment. It is proposed that a definition of ‘suitable alternative alignment’ be added.	Wilts & Berks Canal Trust.
<b>Environmental Impact Assessment [EIA] [policy paragraph 4]:</b> First sentence of paragraph 4 requires that an EIA is completed for the whole canal restoration to accompany each planning application. A whole canal project assessment is inconsistent with the treatment of other multi-phase projects which are not required to assess the detailed effects of the whole programme at each application for a part. A more proportionate approach is required.	Wilts & Berks Canal Trust; Wiltshire Swindon & Oxfordshire Canal Partnership.
<b>GBI audit [policy paragraph 4]:</b> The integration into the wider green and blue infrastructure network is very specific on a requirement for GBI audits for canal projects in contrast to the more general requirements in the text on Green and Blue Infrastructure. Paragraph 5.194 in the section on Green and Blue Infrastructure indicates that a more flexible form of assessment better adjusted to the circumstances of a development project will be acceptable. <i>[Alternative policy wording suggested by representors]</i>	Wilts & Berks Canal Trust.

Key issues raised (Policy 94 Wiltshire's canals and the boating community)	Respondent(s)
<p><b>Policy too broad:</b> The policy deals with issues relating to restoration, the control of development on both the existing canal and restoration canals and matters relating to the boating community, and residential moorings in particular. May be better justified and appropriate to deal with the Wiltshire's canals, including restoration within one policy, and the boating community and moorings in a separate policy.</p>	Canal & River Trust.
<p><b>Differentiate between canals:</b> The policy and supporting text refers to all three canals within Wiltshire, two being restoration projects owned by restoration societies, and the other being the Kennet &amp; Avon, owned and managed by the Canal &amp; River Trust. There needs to be some differences in policy approach between canals which are being restored and the Kennet &amp; Avon which is fully operation.</p>	Canal & River Trust.
<p><b>Residential moorings [Para 5.206]:</b> Wording "a comprehensive approach to identifying residential moorings may be appropriate, whereby multiple applications relating to a 'stretch' of canal can be considered together." It is not clear if this comment relates to all canals or just the restoration canals, nor what the definition of a 'stretch' of canal means. With regard to the existing Kennet &amp; Avon canal (owned and managed by the Canal &amp; River Trust), the Kennet &amp; Avon Conservation Management Plan indicates that no new moorings will be permitted on the offside of the canal. The Canal &amp; River Trusts Moorings policy prevents new moorings on the mainline of the canal and any new moorings would therefore need to be located offline, in mooring basins or marinas and would need a network access agreement from the Canal &amp; River Trust to connect to the main canal. Each application for a network access agreement is looked at on its own merits. As a single policy it is not always clear where responsibilities lie, which canal is being referred to or what type of mooring the council is seeking to control.</p>	Canal & River Trust.
<p><b>Radial Gate:</b> There is radial gate adjacent to the Cooper Tire site (Melksham) which is used to retain water levels, following flood risk improvements in the 1970s, but it is reaching the end of its planned life and provides limited flood risk benefit when open (risk is increased if it fails to close). This structure could be modified by the canal, therefore highlighting this point is advised for the local plan as there is potential for significant modification within the lifetime of the plan.</p>	Environment Agency.
<p><b>Safeguarded canal routes</b></p>	
<p><b>Deliverability:</b> <i>"The council will support its identification and historical significance by signage where appropriate"</i>. There is no hook in the policy to ensure that this takes place. Prior applications have not delivered on this. Policy should make clear that any proposal must be supported by a robust business case and any associated planning consents for enabling development.</p>	Melksham Without Parish Council.

Key issues raised (Policy 94 Wiltshire's canals and the boating community)	Respondent(s)
<p><b>Melksham route safeguarding unjustified:</b> The outdated safeguarding of the canal route to the south of Melksham is unjustified. The scheme is undeliverable, as demonstrated by the historic planning application (submitted in 2012), which does not have Environment Agency support or a clear indication of how the necessary land would be required without landowner support.</p>	<p>Martin Grant Homes.</p>
<p><b>Does not positively plan for Melksham safeguarded route delivery:</b> The plan does little to positively plan for the restoration and reestablishment of the link between the Kennet and Avon Canal (at Semington) and the River Avon (at Melksham). This is a missed opportunity and highlights inadequacies in the site selection process. Despite this being a strategic aspiration of the plan, it is not one which has informed or influenced the strategy for Melksham.</p>	<p>Turley on behalf of Baker Estates Ltd.</p>
<p><b>Canal buffer protection:</b> There is not specific protection in place for the land immediately adjacent to the canal. The safeguarding of this area on both sides is of vital biodiversity significance. There should be a substantial and permanent wildlife buffer between the Kennet &amp; Avon canal and any development to its north associated with the new canal infrastructure.</p>	<p>Westwood, Semington And Wingfield Parish Councils; Individuals x10</p>
<p><b>Berryfield community:</b> The policy does not mention of the impact on the existing community of Berryfield that the route will go straight through the middle of. There is a need to ensure a substantial wildlife / GBI buffer around the canal to maintain a substantial green buffer between Berryfields and Semington.</p>	<p>Melksham Without Parish Council; Individuals x10</p>
<p><b>Removal of safeguarded route?:</b> This policy seems to have taken away the safeguarded route which is now ambiguous? It only talks about the creation of a new link from the Kennet &amp; Avon at Semington and River Avon at Melksham to facilitate the re-opening of the Wilts &amp; Berks as navigable waterway. Where has the onward link across Queensfield towards Lacock gone? The onward route is not protected?</p>	<p>Melksham Without Parish Council.</p>
<p><b>Flexible approach [policy bullet 2]:</b> It is important that a flexible approach to route safeguarding is taken, as the route previously proposed is not the only one which can successfully deliver the link that is required. Clause 2 of Policy 94 does recognise the potential for alternative suitable alignments.</p>	<p>Turley on behalf of Baker Estates Ltd.</p>
<p><b>Financial contributions</b></p>	
<p><b>Financial contributions requirements [paragraph 5.199]:</b> Policy 94 indicates that financial contributions may be sought towards canal restoration or improvement works. The canal restoration work is a Council aspiration as opposed to a requirement to meet Wiltshire's development needs. Accordingly, unless developments are reliant on the restored canal network to meet specific requirements (such as drainage or biodiversity), any requirement to secure financial contributions towards restoring the canal network would fail to ensure the Plan's legal compliance.</p>	<p>Gleeson.</p>
<p><b>Intended use:</b> Is it intended that financial contributions from development will fund W&amp;B canal link project?</p>	<p>Melksham Town Council.</p>

Key issues raised (Policy 94 Wiltshire's canals and the boating community)	Respondent(s)
<b>Site Specific Concerns (note, site specific concerns submitted against Policy 88 have been summarised here but detailed consideration of the key issues raised for these site allocations can be found in the relevant site allocation policy table)</b>	
<b>Policy 7 (Land South of Chippenham and East of Showell Farm):</b> A section of 'existing and planned' canal route cuts through a small portion at the eastern edge of the Land South of Chippenham and East of Showell Farm allocation. Whilst it does not appear as though the canal route will have implications on maximising the allocation's development potential, it is important to ensure that Policy 94 is clear that any work to the canal network does not hinder the development potential of site allocations, to ensure that the deliverability of the Plan is not prejudiced (and that there is no conflict with paragraph 35c) of the NPPF).	Gleeson.
<b>Policy 53 Land North-East of Hilperton:</b> Concern that development at this site will increase pressure on the canal corridor through increased use. This may cause conflicts between users such as pedestrians, cyclists and boatowners.	Hilperton Parish Council With Hilperton Area Action Group.



Table 5.114 [Policy 95 - Flood risk] key issues

Key issues raised (Policy 95 - Flood risk)	Respondent(s)
<b>Policy support:</b>	
<b>Support:</b> Conditional support for all/ part of Policy 95 was expressed by a number of representors.	Calne Without Parish Council; Leda Properties; David Wilson Homes; Hill Residential Ltd; Mac Mic Group; Hilperton Parish Council with Hilperton Area Action Group; Wessex Water.
<b>Drafting errors and wording amendments:</b>	
<b>Drafting error:</b> Second to last bullet point of policy, text within brackets Representor believes, has been added in error.	Corsham Town Council.
<b>Wording amendments:</b> Minor policy wording amendments were suggested by the representor.	CPRE South Wiltshire Group.
<b>Wording amendment:</b> Replace reference to ' <i>Flood Zones 1,2 and 3</i> ' and instead use terms ' <i>low, medium and high risk</i> ' .	Environment Agency.
<b>Flooding and National Policy</b>	
<b>Required details to be considered as part of a planning application:</b> When considering planning applications, consideration should be given to site-specific circumstances; up-to-date detailed site investigation work and the SFRA.	Society of Merchant Venturers; Miller Homes.
<b>Issues, other than the flood zone, to be considered when assessing flooding:</b> The flood zones shouldn't be the only area where flooding issues are considered. The plan doesn't address issues of unmaintained gullies, drains, lack of soak away land or poor drainage, which all cause flooding.	Lydiard Tregoze Parish Council.
<b>Lack of guidance relating to when a Groundwater Assessment is required:</b> No guidance is included within the LPR or Council's Validation Checklist of when a Groundwater Assessment will be required. Further clarity required.	Society of Merchant Venturers; Miller Homes.
<b>Lack of consideration of flooding issues when allocating sites:</b> Flooding doesn't appear to have been considered as a significant issue when allocating the sites.	Individuals x10.
<b>Sewer flooding needs to be included within the Policy:</b> Sewer flooding should be detailed as a form of flooding.	Thames Water.

Key issues raised (Policy 95 - Flood risk)	Respondent(s)
<b>Water/ sewerage related infrastructure:</b> Water and/ or sewerage related infrastructure may be required (developed or upgraded/ extended) in flood risk areas to, <i>inter alia</i> , service new development. Flood risk sustainability objectives should accept this form of development may be necessary in flood risk areas.	Thames Water.
<b>Flooding not within the flood plain:</b> Flooding may occur outside the floodplain as a result of development, where off site sewerage infrastructure and capacity is not yet in place, before the development is completed.	Thames Water.
<b>Non-compliance with legal requirements:</b> The policy fails to comply with the legal requirements for climate mitigation and adaption policies. It doesn't distinguish new settlements, significant urban extensions or residential development with a lifetime over 100 years from other developments, as detailed within the Environment Agency guidance, whereby higher flood risk standards should apply. Policy wording amendments were suggested by the Representor.	Wiltshire Climate Alliance.
<b>The Plan doesn't make it clear if the Sequential test has been followed for new allocations:</b> Following the sequential approach, should be preceded by applying the sequential test. The plan doesn't make it clear if the sequential approach has been followed for new allocations.	Environment Agency.
<b>Too much focus on surface water flooding:</b> The Policy is disproportionately surface-water focused. All sources of flooding must be represented. Policy wording amendments were suggested by the Representor.	Environment Agency.
<b>Development on floodplains should be avoided:</b> More should be done to avoid building on the floodplain, with more houses being built on the floodplain than are needed, ignoring brownfield and windfall figures (with approved planning permission or that have commenced). Figures are 18 months out of date.	Individuals x10.
<b>Flood plain meadows:</b> Whilst the document refers to flood risk management, there should be specific reference to restoration of flood plain meadows for flood mitigation, water quality improvement, carbon sequestration and biodiversity enhancement.	Individuals x10.
<b>Insufficient garden drainage in new homes:</b> Homes are being built with insufficient surface drainage for their gardens.	Individuals x10.
<b>Road drainage:</b> The Highways Authority is dodging and disclaiming its' responsibility with regard failing road drainage.	Individuals x10.
<b>Reference to Policy 95 should be included in Policy 3:</b> Policy 3 should cross-reference Policy 95 in relation to new development and local circumstances.	Melksham Town Council.

Key issues raised (Policy 95 - Flood risk)	Respondent(s)
<p><b>Flooding considerations for planning applications:</b> A high levels of scrutiny should be applied to all development proposals with regards flooding (and flood risk) and developers are required to provide high levels of mitigation, both within the site boundaries and also up and down stream of the development. Every single development will have its own future flood-footprint downstream, which is measurable and quantifiable. The fewer, the better.</p>	Individuals x10.
<p><b>Recent storm events:</b> The Plan doesn't address the impacts of flooding caused by recent storm events.</p>	Lydiard Tregoze Parish Council.
<p><b>The impact of smaller developments on flooding:</b> The plan doesn't take account or detail the impact of smaller developments (2-10 dwellings) on flooding.</p>	Lydiard Tregoze Parish Council.
<p><b>Flood management using canals :</b> Canals offer an additional method of flood management and should be detailed within the Plan.</p>	Wilts and Berks Canal Trust.
<p><b>Strategic Flood Risk Assessment (SFRA):</b></p>	
<p><b>An SFRA update is required:</b> The existing SFRA Level 1 requires updating before it may be used to inform (and evidence) new allocations. Updates to national policy and more recent and better flood modelling is now available. If not produced, there are implications for housing numbers on allocated sites. Without a proper strategic assessment of flood risk the proposed housing figures may be inaccurate. Any new site allocations, that include areas at flood risk, are unsound until supported by an up-to-date SFRA Level 1 (and Level 2 where identified as necessary by the Level 1).</p>	Environment Agency.
<p><b>Lack of an SFRA update after recent storm events:</b> Government guidance requires a review of an SFRA in the case of severe flooding events (Storms Babet and Ciaran). This has not happened.</p>	Wiltshire Climate Alliance.
<p><b>The SFRA is based on outdated evidence:</b> The Sustainability Appraisal used for the 2019 SFRA, is out of date and fails to reflect climate change impacts over the past four years, including recent storms.</p>	Wiltshire Climate Alliance.
<p><b>The SFRA is omitted from the LPR evidence base:</b> The SFRA (Level 1 and any Level 2s prepared) should be listed as part of the evidence base for the Local Plan Review.</p>	Environment Agency.
<p><b>Policy text</b></p>	
<p><b>The Policy exceeds the requirements of national guidance in terms of betterment:</b> The requirement for all major development to achieve a 20% betterment on greenfield run-off rates exceeds the minimum currently expected from new development within national policy and supporting technical standards. Achieving the</p>	Richborough Estates; Richborough Commercial; Ludgershall Homes; Barratt Homes; Barratt Homes & Vistry; Quidhampton

Key issues raised (Policy 95 - Flood risk)	Respondent(s)
required betterment requires a further restriction on discharge rate. No justification or assessment of impact is provided. The policy is not justified, effective or consistent with national policy. Further clarity is required to understand the rationale for this requirement.	Developments Ltd; Cooper Estates; Hannick Homes; Martin Grant Homes; White Horse Country Club; Persimmon Homes (Wessex) & Persimmon Homes (South Coast) Ltd; St Modwen Logistics; Backhouse Housing Ltd; Wadworth And Co. Ltd; Hallam Land Management; Bloor Homes.
<b>The policy is not practical as it will result in unnecessary/ unrealistic volumes of attenuation:</b> The setting of a betterment figure that over-mitigates the impact of development results in proposals having to accommodate an unnecessary/ unrealistic volume of attenuation, reducing the amount of available developable land and site viability, requiring additional work to achieve this. Policy wording amendments were suggested by the Representor(s).	Barratt Homes; Barratt Homes & Vistry; Backhouse Housing Ltd; Wadworth And Co. Ltd; Hallam Land Management; Backhouse Housing Ltd; Wadworth and Co. Ltd.
<b>Brownfield betterment:</b> It is reasonable that new brownfield schemes will provide brownfield betterment to existing drainage. The policy should allow for flexibility where little or no betterment can be achieved on a site by site assessment of current infrastructure protection. Policy wording amendments were suggested by the Representor.	Ludgershall Homes.
<b>No reference is made to non-greenfield and under-utilised land:</b> The policy is not positively prepared as it does not stipulate run-off betterment for non-greenfield sites & under-utilised land. Policy wording amendments were suggested by the Representor.	Wiltshire Climate Alliance.
<b>Higher standards should be sought:</b> Developers could be encouraged to explore opportunities to achieve higher standards.	Hallam Land Management.
<b>Conflict between the Policy and SFRA requirements:</b> The Policy requirement for all major development to achieve a 20% betterment of greenfield runoff rates conflicts with the SFRA, which recommends that a 20% betterment is achieved in areas of high risk. Policy 95 applies the requirement to all areas without justification.	St Mowden Logistics.
<b>Sustainable Urban Drainage Systems (SuDS):</b>	
<b>The role of SuDS:</b> Limiting the amount of surface water water entering the foul and combined sewer network is critically important. SuDS have an important role to play in ensuring the sewerage network has capacity for population growth and the effects of climate change and mitigating flooding, as well as other, positive benefits.	Thames Water.

Key issues raised (Policy 95 - Flood risk)	Respondent(s)
<p><b>The SuDS requirement is out of line with national policy:</b> The policy is unjustified and inconsistent with national policy. Paragraph 169 NPPF (2023) states that only '<i>Major developments should incorporate SuDS unless there is clear evidence this would be inappropriate</i>' and the Policy requirement for SuDS to '<i>provide other multiple benefits</i>' should be amended to clarify '<i>where appropriate/possible</i>'.</p>	<p>Society of Merchant Venturers; Miller Homes; Brimble Lea.</p>
<p><b>Natural permeability:</b> SuDS are not a substitute for natural permeability.</p>	<p>Lacock Parish Council.</p>
<p><b>Surface water discharge hierarchy:</b></p>	
<p><b>The surface water discharge hierarchy is inconsistent with national policy:</b> The surface water discharge hierarchy, as set out within the Policy 95, differs in order to that within national policy. The policy should be revised to reflect national policy.</p>	<p>Quidhampton Developments Ltd; Cooper Estates; Hannick Homes; Martin Grant Homes; White Horse Country Club.</p>
<p><b>Duplication of building regulations:</b> The Policy is a duplication of legislation, as Building Regulations deal with surface water drainage.</p>	<p>Brimble Lea.</p>
<p><b>Developer responsibility for surface water drainage:</b> It is the responsibility of the developer to make proper provision for surface water drainage (to ground, watercourses or surface water) in accordance with the drainage hierarchy in order to reduce the amount of water entering the sewerage system, maximising capacity for foul sewage and reducing the risk of flooding. Policy wording amendments were suggested by the Representor.</p>	<p>Thames Water.</p>
<p><b>Developers should be directed to the top of the surface water discharge hierarchy:</b> The Policy doesn't highlight the implications of the surface water discharge hierarchy. The policy should firmly direct developers towards implementing the top level of the hierarchy. Policy wording amendments were suggested by the Representor.</p>	<p>Wiltshire Climate Alliance.</p>
<p><b>No reference to canals:</b> Reference to canals has been omitted from the list of surface water bodies. The Representor suggests a wording amendment.</p>	<p>Wiltshire, Swindon and Oxfordshire Canal Partnership.</p>
<p><b>Development-related flooding:</b></p>	
<p><b>Current infrastructure needs should be prioritised over new development:</b> The current infrastructure needs of an area must be delivered before new developments are considered.</p>	<p>Lydiard Tregoze Parish Council.</p>
<p><b>Lack of evidence relating to the flooding impact of, and on, new housing development:</b> No evidence is presented of how future flooding will affect new housing development or how new housing developments will contribute to flooding/ run-off due to less soakaway land.</p>	<p>Lydiard Tregoze Parish Council.</p>
<p><b>Supporting technical documents:</b></p>	

Key issues raised (Policy 95 - Flood risk)	Respondent(s)
<p><b>Planning for Devizes:</b> - Site 8 (Land to the North East of Roundway Park) is detailed with a medium groundwater flood risk but the SFRA Map (May 2019) shows no risk of groundwater flooding. The Representor suggested wording amendments.</p>	Society of Merchant Venturers.
<p><b>Sustainability Appraisal (SA):</b></p>	
<p><b>Non-compliance with national policy:</b> The SA fails to comply with national policy as it assesses a flawed Flood Risk policy.</p>	Wiltshire Climate Alliance.
<p><b>The SA evidence is disputed:</b> Annex 1.1 Chippenham HMA (Pg 62) DAQ 3: Minimise vulnerability to surface water flooding, states that <i>'Melksham is at high risk of river flooding and at moderate risk of surface water and groundwater flooding. The cumulative impact of development is assessed as moderate'</i>. This evidence is disputed, its reference to the risk of river flooding and the allocations (housing and employment) are all in Melksham Without and so not justified. The large villages of Shaw and Whitley and the small village of Beanacre, have consistently received internal property flooding. This is relevant owing to the amount of housing allocated in the Chippenham HMA Rural Large Villages. It appears as if Wiltshire Council's own drainage team were not consulted on the flood risk of these areas.</p>	Melksham without Parish Council.
<p><b>Site specific concerns:</b></p> <p><b>(Note, site specific, flood-related concerns submitted against Policy 95 have been summarised here but a detailed consideration of the key issues raised for these site allocations may be found in the relevant allocation policy table)</b></p>	
<p><b>Policy 48 - Land at Marsh Farm, Royal Wootton Bassett:</b> The Representor has provided details of flooding and drainage management for this site. Consideration of these points will be found within the relevant allocation policy table.</p>	Leda Properties Ltd.
<p><b>Policy 51 - Land at Woodshaw, Royal Wootton Bassett:</b> The Representor has provided details of flooding and drainage management for this site. Consideration of these points will be found within the relevant allocation policy table.</p>	David Wilson Homes.
<p><b>Policy 7 - Land South of Chippenham and East of Showell Farm:</b> This site will exacerbate flooding problems elsewhere, particularly as identified as at risk from groundwater flooding within the SFRA (May 2019), with accelerated run-off from the site's development having consequences for Lacock and Reybridge. There is no evidence detailing consideration of mitigating the risk of further flooding or that the floodplain is addressing current flood levels or 1:100 year storm events plus climate change. Building here should be the minimum necessary until the impact of the current housing is known.</p>	Lacock Parish Council; Individuals x10.

Key issues raised (Policy 95 - Flood risk)	Respondent(s)
<b>Policy 3 - Reserve sites and broad locations of growth:</b> If there is a broad location of growth at Trowbridge, consideration should be given to the building at Hilperton Marsh and Staverton due to the serious potential flood risk presented. Policy 95 is at odds with Policy 3 and Policy 53.	Hilperton Parish Council with Hilperton Area Action Group.
<b>Policy 62 - Land at Bratton Road, Westbury :</b> The original field pipe, was extended as part of a recent housing development, but of incorrect capacity. The council have ignored an expert report on this.	Individuals x10.
<b>Site-specific flood related comment:</b> These have been submitted in relation to Policies 7; 8; 10; 12; 16; 17, 24; 25; 26; 27; 28; 33; 43; 45; 52; 55; 56; 57; 58; 59; 61 by the representor. These comments, including the need, where applicable, for a Level 2 SFRA, will be detailed within the relevant site allocation policy tables.	Environment Agency.
<b>Lydiard Tregoze:</b> The plan is unsound as it doesn't take into account how proposed flood retention ponds at Marsh Farm will affect the headwater of Thunder Brook. Restricting water flow into the brook & forcing water through Lydiard Tregoze plus the impacts of nutrient run off.	Lydiard Tregoze Parish Council.
<b>Chippenham rural area:</b> Any development that increases the flashiness of the Southbrook catchment (Chippenham Rural Area), is undesirable, as this will significantly increase flood risk downstream (as well as within the villages), George Ward Gardens and the Roundponds area.	Individuals x10.
<b>Chippenham rural area:</b> Proposed development at Middle Farm (Chippenham Rural Area) will increase flood risk, both to surrounding housing and further down the catchment. The developers must be required to improve drainage in this area.	Individuals x10.
<b>Southbrook:</b> Water run-off from Goodes Hill (B3353) and the high land to the east contribute to the water levels in the Southbrook.	Individuals x10.
<b>Flood risk issues for Melksham, Shaw &amp; Whitley:</b> Although there are no national landscape designations, flood risk is a significant constraint for Melksham, Shaw and Whitley. This is as noted within the SA (pg 62), Environment Agency Flood Mapping, the Planning for Melksham document and draft LPR Policy . The redundant employment land at Cooper Tires is within flood zones 2 & 3 where development should be avoided.	Melksham Without Parish Council.
<b>Lydiard Tregoze &amp; Royal Wootton Bassett:</b> The plan doesn't take into account the flooding issues of places that sit on clay and limestone ridges, such as Lydiard Tregoze and Royal Wootton Bassett.	Lydiard Tregoze Parish Council.
<b>Omission sites</b>  <b>The following sites were promoted as Omission Sites:</b>	
<b>Land at Lawn Farm, Malmesbury:</b> Some flood-related details provided.	Hill Residential.

Key issues raised (Policy 95 - Flood risk)	Respondent(s)
<b>Land north of Malmesbury Road, Cricklade:</b> Some flood-related details provided.	Mac Mic Group.
<b>Cooper Tire's, Melksham:</b> The plan has selected greenfield sites in Flood zone 1, which causes constraint issues for the Cooper Tires site. Sequential testing and/ or the exceptions test will need to support the site's future development where at least the land is within Zones 2 & 3.	Melksham Town Council.



Table 5.115 [Policy 96 - Water resources] key issues

Key issues raised (Policy 96 - Water resources)	Respondent(s)
<b>Policy support:</b>	
<b>Conditional support for policy:</b> Conditional support for all/ part of Policy 96 was expressed by a number of representors.	Calne Without Parish Council; Wilts and Berks Canal Trust; Wessex Water; Chippenham Town Council.
<b>General:</b>	
<b>Policy doesn't go far enough:</b> To combat Wiltshire's water-stressed status, the Policy relies on consumption limitation and recycling/ collection methods. As the Plan runs to 2038, these don't go far enough, and a more significant, strategic approach is required such as a reservoir.	Rushall Parish Council.
<b>Wiltshire's water-stressed area is not defined correctly:</b> Wessex Water and Veolia supply areas are classified as 'Water Stressed' and not the whole of Wiltshire as detailed in the Plan.	Environment Agency.
<b>Projected growth should match that within Wessex Water's Water Resource Management Plan:</b> The projected growth within the LPR should match that within the Wessex Water draft Water Resources Management Plan.	Environment Agency.
<b>The need for a policy on water quality:</b> Policy 96 covers both water quality and water resources. There is no specific policy on water quality. Either add to the title of this policy or create a new 'Water Quality' policy.	Environment Agency.
<b>The Policy should reflect the Water Directive Framework:</b> The objectives of the Water Directive Framework and the incorporation of Sustainable Urban Drainage Systems (SuDS) should be reflected and strengthened within Policy 96.	Environment Agency.
<b>Water capacity/ pressure issues:</b> The Plan does not address water capacity or water pressure issues within current homes.	Lydiard Tregoze Parish Council.
<b>The Policy is unable to control future adaptations to dwellings:</b> The effectiveness of the policy in reducing water consumption is questioned, as it can not control adaptations and changes to dwellings post occupation.	Bloor Homes South West Ltd.
<b>Problems associated with grey water recycling:</b> Grey water recycling will have issues with smell, filtration systems blocking, replacement of filters and some UV processing.	Ludgershall Homes.
<b>Higher water usage requirements:</b> The policy is insufficiently flexible to reflect users, such as Salisbury District Hospital, that require higher levels of water use. Lower water usage is difficult to achieve in some settings, without compromising hygiene and patient safety.	Salisbury NHS Foundation Trust; Salutern Developments.

Key issues raised (Policy 96 - Water resources)	Respondent(s)
<p><b>Site allocations should be assessed against a number of considerations:</b> Identification of Source Protection Zone, Safeguard Zone or Water Protection Zone and buffers within the Joint Melksham Neighbourhood Plan (JMNP) area should be used to assess allocations.</p>	Melksham Town Council.
<p><b>Types of applicable development:</b> The policy refers to 'All' development', including that which doesn't create any new floorspace. The Policy should only apply to the construction of new buildings to ensure a proportionate approach and avoid an unnecessary burden on other types of development.</p>	Railway Pension Nominees Ltd.
<p><b>Water provision is uncertain beyond 2030:</b> The provision of water &amp; its abstraction from groundwater and river sources to accommodate additional development is uncertain beyond 2030, particularly considering Wiltshire's water-stressed status.</p>	Individual x10.
<p><b>The infrastructure needs of development:</b> The Plan should ensure there is adequate water and wastewater infrastructure to serve all new development. Where there are infrastructure constraints, the time taken to deliver the necessary infrastructure should not be underestimated. Developers should be liaising with the water companies as early as possible. Policy wording amendments were suggested by the Representor.</p>	Thames Water.
<p><b>The need for a policy on water and sewerage/ wastewater infrastructure:</b> An additional policy is required addressing the provision of water and sewerage/ wastewater infrastructure to service development, particularly owing to the differences between the LPR plan period and the five year plan period that water companies work to. Policy wording amendments were suggested by the Representor.</p>	Thames Water.
<p><b>Include reference to Thames Water's pre-planning service:</b> The supporting text should be amended to include reference to the Thames Water free Pre-Planning service, which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. A hyperlink is provided by the representor.</p>	Thames Water.
<p><b>The need for a Water Cycle Study (WCS):</b></p>	
<p><b>The need for robust underpinning evidence:</b> There is a lack of evidence to demonstrate that existing river and groundwater quality status &amp; waste water infrastructure have been evaluated when determining locations for new allocations. A WCS would represent such evidence. This could also evidence that Wastewater Treatment Works have sufficient headroom to accommodate development growth over the plan period.</p>	Environment Agency.
<p><b>Determination of sufficient water capacity:</b> The Habitats Regulations Assessment (incorporating the Appropriate Assessment) concludes that further evidence as part of Water Cycle Study (or equivalent) is required to determine there is sufficient water capacity and whether appropriate mitigation measures are required and can be secured to ensure no adverse effects. This conclusion could affect the delivery of housing over the plan period. It is essential that the evidence base for the Local Plan is further developed</p>	The Crown Estate.

Key issues raised (Policy 96 - Water resources)	Respondent(s)
<p><b>The adequacy of foul drainage, sewerage and sewage treatment should be assessed:</b> The Policy statement '<i>Development will only be supported where adequate foul drainage, ... or where suitable arrangements are made for their provision</i>' is not positively prepared and should be amended, informed by a Water Cycle Study (or equivalent).</p>	The Crown Estate.
<p><b>Water efficiency standard:</b></p>	
<p><b>The policy goes beyond building regulations requirement:</b> The Policy requires a predicted mains water consumption of no more than 85 litres per person per day (lppd). This is much lower than the existing standards (Building Regulations, approved document G) of the optional requirement 110lppd and significantly below the statutory requirement of 125lppd. This has not been properly assessed. The local evidence base must provide justification for a tighter than building regulations water efficiency figure. No evidence has been provided. Various policy wording amendments were suggested by the Representors, as well as deleting the policy and using the building regulations to assess water consumption.</p>	Gleeson Land x 3; Society of Merchant Venturers; Miller Homes; TOFF Corporate Trustees; Backhouse Housing Ltd; Wadworth & Co Ltd; Richborough Estates; House Builders Federation; Terra Strategic Ltd/ White Horse Country Club Ltd; Quidhampton Developments Ltd; Martin Grant Homes; Hannick Homes; Cooper Estates; Persimmon Homes South Coast and Persimmon Homes Wessex Ltd.
<p><b>Sustainable construction should be determined by building regulation requirements:</b> Building regulations set sustainable construction standards, not the planning system. Building Regulations will become more onerous, reflecting the feasibility of sustainable construction measures and technology. The policy does not reflect this. Policy wording amendments were suggested by the Representor.</p>	Gleeson.
<p><b>The Policy conflicts with the requirements as set out within Wessex Water's Water Resource Management Plan (WRMP):</b> The requirement of 85lppd is not consistent with the water targets as set out by Wessex Water in WRMP24 Technical Report 14, which aim for 122lppd by March 2038 and 110lppd by 2050. No explanation is provided for the divergence.</p>	Bloor Homes South West Ltd; Persimmon Homes South Coast and Persimmon Homes Wessex Ltd.
<p><b>The need for a WCS to support this tighter water efficiency standard:</b> Fully support the requirement of 85lppd water usage but it needs to be supported by robust evidence, such as a Water Cycle Study.</p>	Environment Agency.
<p><b>The water efficiency standard is more ambitious than average daily water consumption:</b> The 85lppd mains water consumption target is far more ambitious than the average daily water consumption in Britain of 142lppd. The deliverability of this target, and how the 85lppd figure has been ascertained, is questioned. The 85lppd is not achievable.</p>	South West Housing Association Planning Consortium; Ludgershall Homes.
<p><b>The water efficiency standard should account for future fittings amendments:</b> Whichever water efficiency standard is used, an extra 10lppd is added to account for changes to less water efficient fittings throughout the lifetime of the development. Natural England (see Nutrient Neutrality Generic Methodology Feb 2022, Step 2)</p>	Ludgershall Homes; Persimmon Homes South Coast and Persimmon Homes Wessex Ltd.

Key issues raised (Policy 96 - Water resources)	Respondent(s)
takes a precautionary approach and seeks 120lppd when factoring water usage for nutrient impact assessment in Wiltshire. A 85lppd efficiency figure will result in fixtures and fittings being fitted in new dwellings, that future occupiers will replace to less efficient fittings post completion.	
<b>Secondary issues associated with a low water usage:</b> Once water usage gets too low, secondary issues occur such as odour, air quality and human health as the piped system is not sufficiently flushed through. Water consumption below 100lppd is difficult to achieve which causes other issues.	House Builders Federation; Terra Strategic Ltd.
<b>Planning conditions relating to the water efficiency standard:</b> As the Thames Water area is defined as 'water-stressed', it is considered a condition relating to 110lppd water efficiency level, should be attached as standard to all planning applications for new residential development. Policy wording amendments were suggested by the Representor.	Thames Water.
<b>A lower than building regulations water efficiency standard is not justified:</b> Is it justified to formally require rather than encourage and support adherence to the 85lppd, which is significantly beyond the 110lppd set within Building Regulations.	Wyatt Homes.
<b>Policy should advocate the 'Fittings Approach' to water efficiency calculations:</b> In order to achieve the 110lppd water efficiency target, developers should use the 'Fittings Approach' (rather than 'Calculation Method') to increase the confidence levels that water efficient devices will be installed in new dwellings. Policy wording amendments were suggested.	Thames Water.
<b>Site/Area specific concerns - Various</b>	
<b>Land South East of Empress Way, Ludgershall (Policy 40):</b> This site is adjacent to a Wastewater Treatment Works with no buffer zones/ safeguarded areas designated but rather impacts are understood on a case by case basis. The Institute of Air Quality Management states best practice is to use a multi-modal approach. The policy should be modified to reflect this.	Ludgershall Homes.
<b>The water supply at Royal Wootton Bassett/ Hook is already constrained(supporting paragraph 4.241):</b> Water supply at Hook/ Royal Wootton Bassett is constrained. The Plan states a local water provider will provide a major infrastructure development project within 3-5 years, proposed funding methods and that the Water Resource Management Plans will address the issues. This does not equate to concrete plans. Current infrastructure must be delivered before new development. The water main through Hook needs replacing but the water provider has refused to do so.	Lydiard Tregoze Parish Council.

Key issues raised (Policy 96 - Water resources)	Respondent(s)
<p><b>Policy 45 (Land at Chopping Knife Lane, Marlborough):</b> Concern expressed regarding the impact of development on the nearby River Kennet (an internationally recognised chalk stream) with potential wastewater issues and sewage discharging into the river. Development should be sited on brownfield sites or an extension to the existing settlement rather than greenfield.</p>	Marlborough Town Council.
<p><b>Policy 45 (Land at Chopping Knife Lane, Marlborough):</b> The Plan recognises that the Marlborough's treatment plant's capacity is already inadequate and a wastewater upgrade is required. Development should be sited on brownfield sites or an extension to existing settlement rather than greenfield.</p>	Marlborough Town Council.
<p><b>Site specific concerns - Policy 27 - (Site 8 -Land south of Harnham, Salisbury) and Policy 28 (Site 9 - Land West of Combe Road, Salisbury)</b></p>	
<p><b>The serious 'Water-Stressed' designation will impact on the feasibility of development:</b> The Plan classes the area as 'Seriously water stressed'. Additional development is doubtful and the Plan is not sound in respect of water resources. Remove Sites 8&amp;9 from the Plan.</p>	Individuals x10.
<p><b>Infrastructure problems associated with Sites 8&amp;9:</b> The infrastructure problems in providing sufficient/ adequate facilities are considerable and the details provided in the proposal are sparse, particularly in relation to water and sewage. The Plan doesn't provide sufficient details on whether existing facilities can cope; whether there is sufficient surface water runoff and who will finance. The SA states <i>'moderate off-site infrastructure reinforcement for water supply and foul drainage will likely be required'</i>. Remove Sites 8&amp;9 from the Plan.</p>	Individuals x10.
<p><b>Infrastructure improvements will be required and how will this be financed:</b> Britford Treatment centre is operating at capacity. Questions over additional capacity requirements and financing and ensuring there will be no increase in 'overcapacity releases' from the treatment facility into the River Avon. This needs to be demonstrated for the next 10 years. Sites 8&amp;9 should be removed from the Plan.</p>	Individuals x10.
<p><b>Have the run-off calculations been undertaken correctly:</b> Concern expressed that the mistakes that were made in estimating run-off at the Netherhampton development, have been duplicated in the Plan.</p>	Individuals x10.
<p><b>Existing low water pressure in the area:</b> Low-water pressure is a re-occurring issue at Harnham Hill.</p>	Individuals x10.
<p><b>The implications of a large septic tank facility:</b> The area south of Portland Avenue will require septic tank drainage as there is no mains sewerage, requiring major storage facilities and regular emptying. This will increase vehicular movement and risk of spillage and overflows. Remove Sites 8&amp;9 from the Plan.</p>	Individuals x10.

Key issues raised (Policy 96 - Water resources)	Respondent(s)
<p><b>Insufficient details are provided in relation to funding and the necessary water/ sewerage related infrastructure to service these sites</b> The Plan doesn't provide information on who will fund and the economic feasibility of installing the required pumping facilities to transport a substantial volume of sewage over an extensive distance or provide evidence for all the water resources, foul drainage and treatment and water run-off facilities and treatment, on a sloping site. Sites 8&amp;9 should be removed.</p>	Individuals x20.
<p><b>Site specific concerns - Policy 27 - (Site 8 -Land south of Harnham, Salisbury)</b></p>	
<p><b>Need for a new pumping facility:</b> The main part of the site slopes towards the Ebbles Valley. The existing sewage treatment works are more than 500m away and will require a new pumping facility for more than 300 houses, pumping uphill. Assurance is required that no backing up or overflow will occur.</p>	Individuals x10.
<p><b>The need for sufficient surface run-off provision:</b> Is there sufficient surface run-off provision to prevent flooding in the Ebbles Valley.</p>	Individuals x10.
<p><b>Water supply is only assured until 2030 and to existing properties:</b> There is an existing water main to the site but water supply is only assured until 2030 and not the end of the plan period (2038) &amp; only to existing households. New housing development would not have assured water facilities.</p>	Individuals x10.
<p><b>Site specific concerns - Policy 28 (Site 9 - Land West of Combe Road, Salisbury)</b></p>	
<p><b>Deficiencies in existing water and sewerage facilities:</b> Have water &amp; sewerage facilities been sufficiently planned for given existing properties along Coombe Rd have a septic tank system. Could existing deficiencies be improved to modern sewerage and drainage standards.</p>	Individuals x10.
<p><b>Development within the vicinity of a Sewage Treatment Works (SWT) related concerns</b></p>	
<p><b>Development within the vicinity of a STW /the need for an Odour Impact Assessment:</b> The policy should address how the impact of any development within the vicinity of an existing sewage treatment works will be assessed, in line within the Agent of Change principle set out in the NPPF. Where development is within 800m of a STW, liaison with the Water Company is required to assess whether an odour impact assessment is required, which should determine whether the development will have an adverse impact on new occupiers. The odour impact assessment would form the evidence base as to whether an amenity buffer is required. Policy wording amendments were suggested.</p>	Thames Water.
<p><b>Minor wording:</b></p>	
<p><b>Amend policy wording:</b> Replace '<i>Catchment Abstraction Management Strategies</i>' with '<i>Abstraction Licensing Strategies</i>'.</p>	Environment Agency.

Key issues raised (Policy 96 - Water resources)	Respondent(s)
<b>Amend policy wording:</b> Remove reference to ' <i>Catchment Flood Management Plans</i> ' as they are not relevant in this context.	Environment Agency.
<b>Amend policy title:</b> Amend the title of the Policy to ' <i>Policy 96 - Water Resources and Wastewater Infrastructure</i> '.	Thames Water.
<b>Related point(s):</b>	
<b>The credibility of the Viability Assessment (VA) is questioned:</b> The 'Assessment of Local Plan Viability' and the review of the Wiltshire Community Infrastructure Levy Charging Schedule' (September 2023) refers to water efficiency as <i>inter alia</i> one of the policies that will have a direct cost to development. Table 4.1 within the document, does not refer to Policy 96 and therefore there are no cost assumptions provided. As these costs have not been accounted, the credibility of the VA is questioned.	Miller Homes; TOFF Corporate Trustees.
<b>The need for a joined up approach to road works:</b> Object to the Water Board digging up the road at Staverton for 6 months; a major commuter route to Bristol and Bath. The policy should hold the relevant bodies to account for their actions and ensure joined up thinking is applied to traffic management, roadworks and resurfacing and not just a policy addressing water stress.	Individuals x10.
<b>The importance of flood plain meadows:</b> Flood plain meadows naturally mitigate flooding, improve water quality, store carbon and enhance biodiversity. This should be reflected within the Plan as well as an absolute commitment not to build on the floodplain.	Individuals x10.

Table 5.116 [Policy 97 - Contaminated land] key issues

Key issues raised (Policy 97 - Contaminated Land)	Respondent(s)
<b>General</b>	
<b>Repetition of national policy:</b> The requirements of the policy repeat that contained within national policy and is therefore unnecessary.	Brimble Lea.
<b>Deteriorating asbestos hazard:</b> There are many deteriorating asbestos-clad barns and big sheds next to public footpaths, public rights of ways and roads, posing a hazard. Concern has been expressed to the council and a request made that a standard letter be sent to farms etc regarding this issue and that due procedures be followed to safeguard the public.	Individual x10.
<b>Site specific</b>	
<b>Cooper Tires Sites, Melksham:</b> Contamination issues are likely to be the biggest viability challenge facing this site. The placeholder allocation acknowledged contamination.	Melksham Town Council.



Table 5.117 [Policy 98 - Ensuring High Quality Design and Place Shaping] key issues

Key issues raised (Policy 98 - Ensuring High Quality Design and Place Shaping)	Respondent(s)
<b>General</b>	
<b>Support:</b> The policy is generally supported/sound.	Salisbury City Council; Chippenham Town Council; David Wilson Homes; Leda Properties; Hill Residential Ltd; Mic Mac Group; Paul Bowerman Discretionary Trust; Salisbury NHS Foundation Trust (SFT) and Salutem Developments; Individuals x10.
<b>Policy wording:</b> The policy wording is poorly written; duplicative – should be more concise / Some of the text would be better placed as supporting text to improve the policy; Contains several repeated references having regard to local context and local characteristics, which should not be duplicated.	Melksham Town Council; Woodhouse Developments and Bloor Homes; Castlewood Venture Partnerships; L&Q Estates; Hills Homes; Mr and Mrs Self; Manorwood Leisure Developments; Society of Merchant Venturers.
<b>Policy not precise or detailed enough:</b> The policy requirements should be tighter – concern that wording drawn from previous WCS Core Policy 57 has historically not been strong enough to enforce good design in development schemes; The policy requirements are too high level – they do not reflect local design considerations.	Calne Without Parish Council; Individuals x10.
<b>Local level design requirements:</b> The policy should allow space for neighbourhood level design requirements to set locally relevant design context, in the form of site specific design codes – prepared locally or by landowners/developers.	Mac Mic Group; Hill Residential Ltd; David Wilson Homes; Leda Properties Ltd; Paul Bowerman Discretionary Trust.
<b>Utilities development:</b> High standards of design are required and creative approach to new development around high voltage overhead lines and other NGET assets. To ensure Policy 98 is consistent with national policy, inclusion of a new policy criteria is requested, setting out the requirement to take a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites. [Policy wording amendment proposed by the representor]	National Grid Electricity Transmission; National Grid Gas Transmission.
<b>Conformity with national/local requirements</b>	
<b>Design Codes/Design reviews:</b> Concern that there is no reference to the preparation of Design Codes, nor the use of Design Review in the policy.	Historic England.

Key issues raised (Policy 98 - Ensuring High Quality Design and Place Shaping)	Respondent(s)
<b>Historic England guidance:</b> To help inform good practice and reduce risk, Historic England encourage reference in supporting text to Streets for All - Advice for Highway and Public Realm Works in Historic Places, Historic England 2018.	Historic England.
<b>Wiltshire Design Guide SPD</b>	
<b>Status of Wiltshire Design Guide:</b> Until the Local Plan has been adopted and Policy 98 found sound, it is not appropriate for the 2023 Wiltshire Design Guide to rely on the strategic design policy which has yet to be subject to the scrutiny of the Examination process.	Bloor Homes; Persimmon Homes.
<b>Status of Policy 98:</b> The policy is unsound as the Wiltshire Design Guide is still in draft form.	Wiltshire Climate Alliance.
<b>Wiltshire Design Guide too restrictive:</b> Some of the wording within the emerging Wiltshire Design Guide is overly restrictive; it goes beyond the scope set by the PPG that that SPDs should 'build on and provide more detailed advice or guidance on policies in an adopted plan' – the design guide should not impose additional policy requirements beyond the provisions of Policy 98.	Bloor Homes; Persimmon Homes; Individuals x10.
<b>Conformity with national and local design guides:</b> Concern that the policy does not align with national design guidance or with neighbourhood plan design guides; The policy should include reference to the Wiltshire Design Guide and neighbourhood plan policies and design guides.	Salisbury City Council; Melksham Town Council.
<b>Alignment of Policy 98 with the Wiltshire Design Guide:</b> The policy does not synchronise with the Wiltshire Design Guide.	Melksham Town Council.
<b>Amenity</b>	
<b>Lighting:</b> Criterion ix. of the policy should be amended to include requirements relating to lighting.	Individuals x10.
<b>Community facilities:</b> Requirements for large developments to include local shops and facilities should be included in policy, and enforced once planning permission has been given.	Individuals x10.
<b>Landscape/biodiversity</b>	
<b>Support for requirement to incorporate natural features:</b> Welcome the recognition of the value of landscaping and natural features for ensuring high quality design and place setting as set out in Policy 98 clause ii), along with the requirement for street trees and promotion of parks and orchards as set out at clause vii).	Natural England
<b>Views:</b> Criterion i. of the policy should consider views within development sites.	Individuals x10.
<b>Habitats:</b> Criterion ii. of the policy should be amended to refer to protection of critical habitats.	Individuals x10.

Key issues raised (Policy 98 - Ensuring High Quality Design and Place Shaping)	Respondent(s)
<p><b>Repetition of policy criteria:</b> Criterion ii. of the policy relates to landscaping and biodiversity opportunities within development proposals, which is already covered by Policy 88 (Biodiversity and Geodiversity) and should not be repeated.</p>	<p>Woodhouse Developments and Bloor Homes; Castlewood Venture Partnerships; L&amp;Q Estates; Hills Homes; Mr and Mrs Self; Manorwood Leisure Developments; Society of Merchant Venturers.</p>
<p><b>National Landscapes:</b> Emphasis should be placed on the need for highest quality design in the National Landscapes.</p>	<p>Cranborne Chase Area of Outstanding Natural Beauty.</p>
<p><b>Sustainable construction</b></p>	
<p><b>Repetition of policy criteria:</b> Criterion v. of the policy sets out requirements already very similarly covered within Policy 4 (Climate Change) and Policy 86 (Sustainable construction and low carbon energy) – this does not require repetition.</p>	<p>Woodhouse Developments and Bloor Homes; Castlewood Venture Partnerships; L&amp;Q Estates; Hills Homes; Mr and Mrs Self; Manorwood Leisure Developments; Society of Merchant Venturers.</p>
<p><b>Low carbon materials:</b> Criterion xiii could be strengthened by referring to the use of high standards of materials and finishes for buildings, recognising the evolution of building materials and design needed to reach net zero embodied carbon, climate mitigation and adaption; or a cross-reference to Policy 87 (Embodied carbon).</p>	<p>Chippenham Town Council.</p>
<p><b>Active travel</b></p>	
<p><b>Active travel:</b> The policy should include a criterion which requires design layout to support active travel; Paragraph 5.238 should include text requiring new development to be located &amp; structured in a way that reduces the need &amp; desire to travel by car; and that detailed design of the public realm should be supported by high quality transport infrastructure including sustainable linear green infrastructure which helps to increase the attractiveness of cycling &amp; walking, as well as public transport.</p>	<p>Sport England; Individual x10; Salisbury Area Greenspace Partnership.</p>
<p><b>Sport England Active Design Guide:</b> Reference should be made to the Active Design Guide and it's 10 principles to be applied to our built and natural environments, as a baseline requirement.</p>	<p>Sport England.</p>
<p><b>Cycle parking:</b> Criterion viii of the policy could be improved if reference is also added to 'cycle parking' as well as 'vehicle parking'.</p>	<p>Chippenham Town Council.</p>
<p><b>Inclusive design:</b> The Local Plan should embed inclusive design principles into streetscape planning, e.g. safe and suitable routes for mobility scooters, avoiding shared routes - and more parking spaces suitable for older/disabled people.</p>	<p>Individuals x10.</p>

Key issues raised (Policy 98 - Ensuring High Quality Design and Place Shaping)	Respondent(s)
<b>Density</b>	
<b>Development density:</b> Clarity and tighter controls on development density are required in policy.	Hilperton Parish Council.
<b>Clarity on required development density required:</b> Policy 4a ii suggests that density will be linked to whether sites are 'accessible' – but this is not repeated in Policy 98. All sites should show they have made efficient use of land, which must be demonstrated within a strong design code. Policy wording should be introduced with density set at 35-40 dwellings per hectare rising to higher levels in sustainable sites in urban areas.	CPRE.
<b>Efficient use of land:</b> It is not clear how the requirement to make 'efficient use of land' is intended to be interpreted.	Hilperton Parish Council.
<b>Conflict with Wiltshire Design Guide:</b> The supporting text to Policy 98 (para 5.237) adopts a more flexible approach to density than the prescription set out in the Design Guide – there is conflict here.	Bloor Homes; Persimmon Homes.
<b>Historic Environment</b>	
<b>Reuse of historic buildings:</b> Criterion iv. should go further by supporting proposals that promote more efficient use of a historic building that can contribute socially, culturally, economically and environmentally to a community, consistent with NPPF para 190.	Ken Saunders.
<b>Duplication of policy criteria:</b> Criterion iv. is duplicative of Policy 99 and should not be repeated.	Society of Merchant Venturers.

Table 5.118 [Policy 99 - Ensuring the conservation and enhancement of the historic environment] key issues

Key issues raised (Policy 99 - Ensuring the conservation and enhancement of the historic environment)	Respondent(s)
<b>Heritage evidence</b>	
<p><b>Transparency of evidence:</b> It is not clear what heritage evidence has been gathered and applied, how assessment has been carried out and by whom. It should be evident how understanding of the historic environment has informed a positive strategy, policy and principal, form, capacity and design of allocations. Historic Advice Note 3: The Historic Environment and Site Allocations in Local Plans (2015) and Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017) should be considered. The place based documents are impressive but the 2021 consultation committed to further assessment of the historic environment and these assessments are not available. It should be shown how the Historic England response to the 2021 consultation has been addressed. It should be shown how heritage expertise has informed the preparation of the plan, informing a positive response to the issues, opportunities and heritage at risk, to help satisfy national policy guidance and relevant statutory matters.</p>	Historic England.
<b>Policy and supporting text wording</b>	
<p>Historic England recommend the following changes to Policy 99 and supporting text:</p> <ul style="list-style-type: none"> <li>• Where a local plan refers to a consideration of the degree of harm to the significance of an affected heritage asset, then it is important to ensure that Para 199 of the NPPF (2023) is acknowledged. The Representor recommends some additional text for Policy 99/supporting text at paragraph 5.251.</li> <li>• The NPPF defines conservation (for heritage policy) as the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance. To ensure consistency with this the Representor suggests changes to the use of the phrase ‘where possible’ throughout the plan.</li> <li>• In the Plan reference is made to ensuring that a proposal “...does not have a detrimental impact on landscape, heritage assets...”. National policy emphasises the importance of development having a positive impact, rather than merely avoiding harm. The Representor suggests adjustments to ensure consistency with national policy.</li> </ul>	Historic England.
<b>Alignment with national policy</b>	
<p><b>Policy is too restrictive:</b> The policy seeks to re-write the provisions of the NPPF in a more restrictive way. This is unjustified. The policy should closely reflect the NPPF as a matter of consistency.</p>	White Horse Country Club Ltd; Martin Grant Homes; Hannick Homes; Cooper Estates; Quidhampton Developments Ltd.

Key issues raised (Policy 99 - Ensuring the conservation and enhancement of the historic environment)	Respondent(s)
<p><b>Policy is inconsistent with national policy:</b> The policy should be amended to be in line with the NPPF and relevant legislation to make it sound. There is no duty in legislation or the NPPF to preserve or safeguard the setting of listed buildings. The NPPF states great weight should be given to an asset's conservation but sets out circumstances where it can occur. The level of protection given to assets of highest importance, for example, scheduled monuments, is lower than in the NPPF where it states substantial harm or loss should only be in wholly exceptional circumstances. The policy indicates non-designated assets will be conserved in all circumstances. This is higher than protection given to designated heritage assets.</p>	Old Sarum Airfield Ltd. Gleeson Land.
<p><b>Policy is internally inconsistent:</b> The NPPF requires a balancing exercise to be included within policies relating to the historic environment. While the policy states that harm to heritage assets should be outweighed by public benefits at a level appropriate to the significance of the asset, this is overwritten by the opening sentence of the policy which states that "Development should conserve or enhance the historic environment", and "Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance". The words "conserve and enhance" present a binary test where any proposals which result in harm to heritage assets are deemed to be contrary to policy. The policy is internally inconsistent. As policies must comply with the NPPF, the balancing exercise should be retained within the policy, and the overly prescriptive elements removed. As currently drafted a very low and less than substantial harm to the setting of a structure of historic interest would lead to a conclusion that the proposals are contrary to policy. Changes are suggested to the policy.</p>	St Modwen Logistics; St Modwen Logistics and the Sealy Family Trust; Backhouse Housing Ltd; Wadworth and Co Ltd; Barratt Homes Group; Barratt Homes and Vistry.
<p><b>Repetition of national policy:</b> The policy unnecessarily repeats national policy.</p>	Brimlea Lea, Old Sarum Airfield Ltd.
<b>Policy content</b>	
<p><b>Reuse of heritage assets:</b> More emphasis is required on how the historic environment can be enhanced and how an asset can be 'brought back to life'. Specific reference should be made to what constitutes 'sensitive reuse' and how reuse can contribute to communities socially, economically and environmentally.</p>	DPDS Consulting.
<p><b>Non designated assets:</b> Support for the inclusion of non designated assets in the policy. It could also refer to lists in neighbourhood plans.</p>	Calne Community Neighbourhood Plan Steering Group.
<p><b>Heritage and tourism:</b> Longleat would like to develop a strategic plan for investment and engage closely with Wiltshire Council and Historic England on this. The historic environment's potential for investment should be more clearly supported in the policy to ensure sustainable growth. To be flexible and effective the policy should also recognise that historic assets play a role in promoting tourism and cultural offer. Historic assets should be supported to grow and improve to maintain attractiveness and integrity.</p>	Longleat Enterprises Ltd.

Key issues raised (Policy 99 - Ensuring the conservation and enhancement of the historic environment)	Respondent(s)
<p><b>Heritage and carbon reduction:</b> The policy should require that where alterations or development is proposed to a heritage building, an industry-recognised Life Cycle Analysis report identifying reductions in whole life carbon emissions of a minimum of 10% of the building should be required, unless such measures can be proven to be financially unfeasible, and/or can be proven to be detrimental to the heritage element. All such work should be designed to be reversible.</p>	Wiltshire Climate Alliance.
<p><b>Heritage and urban design:</b> More guidance is needed on how Policies 98 and 99 relate to each other.</p>	DPDS Consulting.
<p>Natural England state that the Plan should take full account of comments by Historic England on Policy 99.</p>	Natural England.
<b>Other planning documents</b>	
<p><b>Additional guidance:</b> Additional heritage guidance was also referred to in the Core Strategy but did not come to fruition.</p>	Calne Community Neighbourhood Plan Steering Group.
<p><b>Conservation Area Appraisals and Management Plans:</b> Support for Conservation Area Appraisals and Management Plans is welcomed. Pushing the work to the local level with no financial support might leave areas vulnerable and is the financial responsibility of the local planning authority.</p>	Calne Community Neighbourhood Plan Steering Group.
<b>Place based comments</b>	
<p><b>WW1 badges:</b> There are a number of WW1 'badges' carved on its downland at Fovant. It is unclear which parts of Policy 99 would ensure the conservation and enhancement of these features.</p>	Cranbourne Chase Area of Outstanding Natural Beauty (CCAONB).
<p><b>Rural working farm villages:</b> Support for the policy which will protect and enhance the historic environments of small rural working farm villages.</p>	Keevil Parish Council.
<p><b>Allocations near Hilperton:</b> Support for the policy but the proposals in Policies 52 and 53 near Hilperton are not consistent with it. The supporting text at paragraph 5.246 encourages local communities to develop locally specific heritage policy but this lacks conviction. The local community at Hilperton prepared and adopted a Hilperton Conservation Area Assessment but it has not been adopted by Wiltshire Council. Respondents comment on issues specific to proposals in Policies at 52 and 53. Further detail will be found under Policies 52 and 53.</p>	Hilperton Parish Council with Hilperton Area Action Group, Individuals x10.
<p><b>Melksham Neighbourhood Plan:</b> Ensure alignment of the draft Melksham Neighbourhood Plan with Policy 99.</p>	Melksham Town Council.
<p><b>Old Sarum Airfield:</b> Policy 25 on Old Sarum Airfield should not be deleted because Policy 99 cannot address the site specific circumstances of Old Sarum Airfield. To retain the level of control required to enhance and preserve heritage assets at Old Sarum Core Policy 25 should be reinstated as a stand alone policy</p>	Old Sarum Airfield Ltd.

Table 5.119 [Policy 100 - The World Heritage Site of Stonehenge, Avebury and Associated Sites] key issues

Key issues raised (Policy 100 - The World Heritage Sites of Stonehenge, Avebury and Associated Sites)	Respondent(s)
<b>Heritage</b>	
<b>Guidance for Future Development:</b> Policy should express a need for Historic Impact Assessments (HIA) from relevant future proposals in line with ICOMOS guidance. Clarification required on whether a buffer zone is necessary to the WHS.	Historic England.
<b>Supporting Documents/Evidence Base:</b> If a WHS Setting SPD has been prepared this policy should reference it.	Historic England.
<b>Additional Sites:</b> Policy 100 should make reference to Blick Mead.	Amesbury Town Council.
<b>Transport</b>	
<b>Sustainable Transport:</b> Suggested that Policy 100 and the IDP should facilitate sustainable transport links between Amesbury and the WHS.	Amesbury Town Council.
<b>Policy and supporting text wording</b>	
<b>Supporting text:</b> Paragraph 5.248 is unsound – it gives insufficient emphasis to the context of Policy 100 for the WHS – it should assert to importance of the WHS and the UK’s obligations, as was correctly covered in the first two sentences of para 6.144 of WCS Policy 59. This wording should be reinstated. [Policy wording amendment proposed by the representor]	The Avebury Society.
<b>Supporting text:</b> Paragraph 5.250 is unsound – the word ‘protect’ is missing in this paragraph and needs to be included in the first line of para 5.250 so that it reads ‘Accordingly, proposals which protect, conserve and where possible enhance...’	The Avebury Society.
<b>Supporting text:</b> Paragraph 5.251 is unsound and may not be legally compliant - harm to the Outstanding Universal Value (OUV) of the WHS cannot be offset by public benefits. Destruction of archaeological features are irreversible - public benefits cannot undo irretrievable harms. The wording ‘and any harm or loss to its significance will require clear and convincing justification’ and the text from after the words ‘unless it can be demonstrated...’ to the end of the section should be deleted.	The Avebury Society.
<b>Supporting text:</b> The final sentence in paragraph 5.252 requires correction to read ‘UNESCO guidance to assist with WHS impact assessments will be followed’.	The Avebury Society.



Key issues raised (Policy 100 - The World Heritage Sites of Stonehenge, Avebury and Associated Sites)	Respondent(s)
<b>Supporting text:</b> Paragraph 5.253 requests amendment to reflect that the purpose of the WHS is to protect monuments for current and future generations - the word 'protect' is missing from the paragraph which needs to be included in the first line.	The Avebury Society.
<b>Policy wording:</b> Bullet point ii. omits the words 'permitted development'. To protect the WHS activities such as laying cables/pipes and erecting overhead transmission/telecommunication lines needs to be controlled. This may require application of an Article 4 Direction to restrict permitted development rights. [Policy wording amendment to bullet point ii. proposed by the representor]	The Avebury Society.
<b>Policy wording:</b> The policy should be amended to ensure its provisions are still to be taken into account at Avebury even if the WHS status is lost due to the A303 tunnelling scheme. [Policy wording amendment proposed by the representor]	The Avebury Society.
<b>Policy wording:</b> The sentence beginning 'Opportunities to enhance the WHS...' is unsound as the fundamental purpose of the WHS is to protect monuments for current and future generations. The words 'protect and' are missing and should be included so that it reads 'Opportunities to protect and enhance the WHS...'.	The Avebury Society.
<b>Policy wording:</b> Bullet point a. is unsound – the words 'its protection' should be included so that it reads 'a. improve its protection, conservation and interpretation...'	The Avebury Society.
<b>Policy wording:</b> Bullet point b. is unsound in two respects. First, it only applies to transport plans, but not to applications for individual projects. It is important that Policy 100 applies to any transport proposal. Second, in managing large visitor numbers it is essential that there is no significant increase in net parking provision in the WHS. To deal with both points, bullet point b. should be amended. [Policy wording amendment proposed by the representor]	The Avebury Society.
<b>Policy wording:</b> Policy 100 is unsound because it makes no provision to prevent the generation of additional visitor numbers to attractions that are unrelated to the Henge and associated WHS features. This provision was included in Core Policy 59 but is excluded in the draft Local Plan. Avebury has limited resources to manage large visitor numbers, and a wording amendment is needed. [Policy wording amendment proposed by the representor]	The Avebury Society.
<b>Policy wording:</b> The policy does not include equivalent provision to WCS Core Policy 59 that applicants will need to demonstrate that their development proposals will have no individual, cumulative or consequential adverse effect upon the site and its OUV. This needs to be strengthened in the policy.	The Avebury Society.
<b>Reference to Harm:</b> Policy is not related to any 'harm' which may arise linked to NPPF policy and guidance. Suggested that reference to harm or loss of significance being justified be removed – no development should result in harm to WHS.	Woodhouse Developments (Amesbury) Ltd; Bloor Homes Ltd (Southern Region); CPRE.

Key issues raised (Policy 100 - The World Heritage Sites of Stonehenge, Avebury and Associated Sites)	Respondent(s)
<p><b>Compliance with WHS MP:</b> Given the lifespan of the plan, the policy wording should be amended to comply with future iterations of the WHS Management Plan (WHSMP). Requirements of 'Criteria b' of Policy 100 conflict with the WHSMP which requires exploring car parking options.</p>	<p>Stonehenge &amp; Avebury WHS Coordination Unit; National Trust.</p>
<p><b>Encouraging Development:</b> Criteria i and ii are poorly worded. Criteria ii wording can be construed as encouraging development. It should make clear that not adversely affecting the WHS is a prerequisite for any proposed development.</p>	<p>Classmaxi Ltd; Lincoln College; Individuals x10.</p>
<p><b>Imprecise:</b> Wording is weaker and less precise than WCS CP58 and 59. Suggested to replace LPR Policy 100 with WCS CP59 wording. Policy is unclear on the fact that the WHS consists of two sites. 'Impacts' at Criteria b should be clarified as 'negative impacts'.</p>	<p>CPRE; Stonehenge &amp; Avebury WHS Coordination Unit.</p>
<p><b>Amenity:</b> Criteria a 'respects the amenity of residents' is irrelevant to Policy 100.</p>	<p>CPRE.</p>

Table 5.120 [Policy 101 - Air Quality] key issues

Key issues raised (Policy 101 - Air quality)	Respondent(s)
<b>General policy concerns</b>	
<b>The list of Pollutants should be expanded:</b> Reference to pollutants of particular concern should be expanded to include Ammonia and acid deposition, both of which can have harmful effects on designated sites	Natural England.
<b>Wider range of pollutants:</b> There needs to be more consideration of a wide range of air pollutants + recognition that air quality that meets legal requirements can still cause health and biodiversity problems	Wiltshire Climate Alliance.
<b>The requirement for an Air Quality Assessment:</b> The policy should be amended to make clear all development that may harm a designated wildlife site via aerial deposition will require an air quality assessment (includes SSSIs + UK National Network Sites)	Natural England.
<b>Construct bypasses to improve air quality:</b> In order to improve air quality, build bypasses. This will get HGVs moving and out of town centres. Build dual carriageways so that vehicles can overtake and not sit behind slower moving vehicles	Individuals x10.
<b>The plan should help facilitate the uptake of electric vehicles:</b> In order to improve air quality, the plan should facilitate the uptake of electric vehicles by ensuring every home has enough car parking spaces and providing charging facilities at residential properties as well as big shops and other convenient locations	Individuals x10.
<b>the permitting of development within an Area Quality Management Area (AQMA):</b> It is questioned whether development should be allowed within an AQMA. The policy needs to be strengthened in this regard.	Sustainable Calne.
<b>The effectiveness of measures within the AQMAs:</b> The number of AQMAs in Wiltshire has risen from 5 in 2009, to 8 (across 6 settlements) in 2023. This demonstrates either measurements have been inadequate or a development strategy, dependent on car use built in out-of-town locations has led to this increase, particularly impacting urban areas. Monitoring the effectiveness of this policy should include measurements that show improvements to the quality and a reduction in size and number of the AQMAs.	Cycling Opportunities Group, Salisbury/Wiltshire Climate Alliance.
<b>Reducing the need to travel needs to be encouraged within this policy:</b> Parts of the policy, encouraging self-contained settlements and provision of a better range of transport choices are supported by the Transport Policies (Policies 70 & 71). However the Transport policies have now removed reference to reducing the need to travel , which needs to be encouraged as well as encouraging sustainable modes of transport. Until then the Policy is unsound and unjustified	Cycling Opportunities Group, Salisbury/Wiltshire Climate Alliance.

Key issues raised (Policy 101 - Air quality)	Respondent(s)
<p><b>Policy 101 is dependent on other policies that promote strong sustainable transport and for new development to reduce the need to travel/ promote active travel/ public &amp; shared transport:</b> Air quality issues will occur in urban areas, caused by car dependency, exacerbated by edge of town development, with poor provision of local services, lack of safe walking/cycle routes and poor public transport provision. This all contributes to increased traffic and the persistence of the AQMAs. The Transport policies are currently deficient as they do not take forward the interventions recommended in the Atkins transport evidence base. Transport policies need to be updated to reflect these comments</p>	Wiltshire Climate Alliance.
<p><b>Policy 101 does not go far enough:</b> This policy (and others in the plan which influence air quality) do not go far enough to comply with the NPPF in terms of opportunities to improve air quality &amp; mitigate impacts</p>	Wiltshire Climate Alliance.
<p><b>The underpinning documents need updating:</b> The documents which underpin this policy (Air Quality Action Plan, Air Quality Supplementary Planning document) need to be updated from draft to final form to make the policy sound</p>	Cycling Opportunities Group, Salisbury/Wiltshire Climate Alliance.
<p><b>Utilising green field sites for development:</b> Use of green field sites for development, perpetuates high levels of private car usage, exacerbating traffic congestion and its associated pollutants</p>	Wiltshire Climate Alliance.
<p><b>Evidence documents should be referenced:</b> The 'Air Quality Strategy for Wiltshire 2019-2024' and the 'Supplementary Planning Document on Air Quality 2023' are not included in the documentation supporting the Local Plan</p>	Wiltshire Climate Alliance.
<p><b>Consideration of the cumulative impacts of air pollutants and impact on the very vulnerable:</b> The policy does not address the cumulative impacts or consider situations where, NO<sub>2</sub> is not above objective levels but the development will accommodate very vulnerable residents i.e. brownfield development for older people's flats in a town centre. A more pro-active approach is required, as implied by the DEFRA 'Air Quality Strategy Framework for Local Authority Delivery (2023)'.</p>	Wiltshire Climate Alliance.
<p><b>There is a reliance on old technology:</b> It is concerning that the air quality monitoring relies on old technology (diffusion tubes) and that resources seem to limit progress on many initiatives</p>	Wiltshire Climate Alliance.
<p><b>Solutions to address issues within the AQMAs are required:</b> Solutions to address matters within the designated AQMAs should be considered. When appraising future development (including the scale of development) how this can support strategies to address air quality, particularly in relation to Calne and Westbury should also be considered.</p>	Persimmon Homes (South Coast) & Persimmon Homes (Wessex) Ltd.

Key issues raised (Policy 101 - Air quality)	Respondent(s)
<p><b>Details of acceptable mitigation:</b> The policy should provide specific details of acceptable mitigation and its effects, for example, details are required of distances from new development where impacts may be experienced. Mitigation must not just relate to the location of the proposed development but also the areas where the impact will be felt, as a result of associated traffic movements.</p>	<p>Sustainable Calne/ Calne Community Neighbourhood Steering Group.</p>
<p><b>Supporting technical documents related concerns</b></p>	
<p><b>Sustainability Appraisal (SA):</b> The 'Monitoring' section of the SA requires, at Objective 4, that no applications be permitted, contrary to the advice of the council, on the grounds of air pollution that cannot be mitigated. These seem an ineffective measure. Instead targets should be set to reduce the number and extent of the AQMAs and improve air quality across Wiltshire</p>	<p>Cycling Opportunities Group, Salisbury/Wiltshire Climate Alliance.</p>
<p><b>Supplementary Planning Guidance:</b> Support in principle, but the proposed SPD should not go further than the policy requirement as set out within the Local Plan</p>	<p>Persimmon Homes (South Coast) &amp; Persimmon Homes (Wessex) Ltd.</p>
<p><b>Appropriate Assessment (AA):</b> The AA concludes, in relation to air quality, that NOx &amp; Nitrogen deposition impacts on habitats &amp; international sites are agreed. The AA does not consider the effects of ammonia from road transport at present</p>	<p>Natural England.</p>
<p><b>Site Specific Concerns</b></p> <p><b>(Note, site specific concerns submitted against Policy 101 have been summarised here but detailed consideration of the key issues raised for these site allocations can be found in the relevant site allocation policy table)</b></p>	
<p><b>Marlborough:</b> Marlborough is an AQMA, with levels exceeding WHO levels. Has the effect of 600 houses and employment land been tested in relation to air quality. Have Public Health bodies been consulted as there is no evidence to demonstrate this.</p>	<p>Individual x10.</p>
<p><b>Melksham:</b> Concerns were raised how the 1200+ homes at Melksham will affect the objectives of the Air Quality Action Plan. Melksham is not identified as one of the six community action areas (with AQMZ). The representor questions how has this been assessed and how the plan will impact Melksham.</p>	<p>Melksham Town Council.</p>
<p><b>Trowbridge (Policy 53 - Land North of Hilperton):</b> This allocation will increase pressure on the B3105, which is already under pressure owing to the 425 houses already in the process of construction. This is at odds to the supporting text of Policy 101.</p>	<p>Hilperton Parish Council &amp; Hilperton Area Action Group.</p>
<p><b>Trowbridge/ Staverton (Policy 3 - Reserve sites for housing and broad locations for growth):</b> This policy is at odds with Policy 101. The pollution at Staverton is of particular concern. Mitigation measures within the supporting text are not possible through Staverton, due to the specific geographical conditions.</p>	<p>Hilperton Parish Council &amp; Hilperton Area Action Group.</p>

Key issues raised (Policy 101 - Air quality)	Respondent(s)
<p><b>Calne:</b> Traffic congestion &amp; air quality issues can be addressed via the delivery of significant infrastructure (road link/ road connections from the south at the A4, Quemerford) as part of the Representor's scheme for Calne. However the spatial strategy for Calne and the scale of planned development doesn't allow for higher levels of growth, which is inconsistent with the objectives of this Policy.</p>	<p>Persimmon Homes (South Coast) &amp; Persimmon Homes (Wessex) Ltd.</p>
<p><b>Westbury (Policy 61 - Land west of Mane Way):</b> Land is to be safeguarded for a road bridge, which is essential in reducing congestion and improving air quality. The Infrastructure Delivery Plan, makes no reference of this, resulting in a funding gap and thus it may not be delivered. This is at odds with the objectives of this Policy</p>	<p>Persimmon Homes (South Coast) &amp; Persimmon Homes (Wessex) Ltd.</p>

## Local Plan Appendices and Sustainability Appraisal

**5.32** Please see below the key issues tables listing the key issues raised for the parts of the plan within section 5: delivering the spatial objectives (Environment policies), namely:

- Appendix A Schedule of policies
- Appendix B The settlement boundary review methodology
- Appendix C Housing trajectory
- Appendix D Wiltshire Core Strategy allocations
- Appendix E Town centre and primary shopping area boundary maps (no comments received)
- Sustainability Appraisal





Table 5.121 [Appendix A] key issues

Key issues raised (Appendix A)	Respondent(s)
<b>New Policies</b>	
<p><b>Policy 22: Site selection:</b> Former quarry site 3521, as part of site 7, was not taken forward due to potential archaeological concerns. It should be included as it is situated outside of the area with archaeological concerns, it is a brownfield site, is within Salisbury’s principal settlement boundary and is in close proximity to newly established adjacent residential development. Regarding the comment from the Local Plan Pre-Submission (Cabinet Version, July 2023) in relation to the site not being suitable due to reduced sunlight, a calculation has been provided showing less than 10% of the site is affected when applying a 45 degree angle from the quarry’s south facing retaining walls.</p>	Lazbeth Properties (Salisbury) Ltd.
<p><b>Policy 26: Biodiversity:</b> Development will have a negative effect on the distinctive area of greenbelt with a wealth of nature.</p>	Individuals x10.
<p><b>Policy 26: Highways:</b> There will be a detrimental effect on existing residents from increased traffic and pollution in areas where there are issues with congestion and a need for road improvements and enhancements. Area around Harnham Gyratory is regularly severely congested and nothing has been done to improve this, yet development is still being sought in the Harnham area. The sustainability appraisal notes Britford Park and Ride has good access to the city centre, however it is not utilised as it has no dedicated bus lane and also gets caught in the congestion at Harnham Gyratory.</p>	Individuals x10.
<p><b>Policy 26: Flooding:</b> The river Avon and surrounding water meadows regularly flood the area and the increased risk to homes and roads must be considered. The policy does not show how the development will ensure risk is not increased elsewhere, as stated in the Sustainability Appraisal.</p>	Individuals x10.
<p><b>Policy 26: Infrastructure:</b> Inclusion of site 6 undermines the needs of the immediate area and wider Salisbury area as it is increasing population without ensuring sufficient social infrastructure. The local primary school will not have capacity and the GP services are already under pressure, the policy makes no proposal for improvement. Wessex Water have stated they are unable to meet an increased demand for the foreseeable future and it is within a drinking water protected area.</p>	Individuals x10.
<p><b>Policy 26: Framework/SA:</b> The effects development would create in this area are not consistent with NPPF or Sustainability Appraisal Assessment Outcomes.</p>	Individuals x10.
<p><b>Policy 26: Open Space:</b> The footpath around site 6 is a well-used route linking the city and Britford. It is the only remaining footpath with a rural aspect between Salisbury and Britford. Access to open space is valuable for health and well-being in the city.</p>	Individuals x10.

Key issues raised (Appendix A)	Respondent(s)
<p><b>Policy 26: Heritage:</b> The development of this site compromises the historic setting of Salisbury Cathedral, the wider city and local area (which is important for tourism), two conservation areas, a SSSI and an area of archaeological potential. The Sustainability Appraisal states “further assessment of the level of impact” is required, no such assessment has been undertaken. Britford village conservation area plan mentions the “open rural landscape setting” which is “of great significance historically” and the development would cause harm, it is felt that the plan has been disregarded. Site 6 is the only buffer between Britford village and Salisbury and the conservation document states its “character is separate from the city” and should “have its own identity”. Mitigation in the form of a woodland screen would block views of the cathedral and change the existing “open setting”. Development will impact current environment, listed buildings and neighbouring areas.</p>	Individuals x10.
<p><b>Policy 26: SSSI:</b> NPPF states that development on land within or outside a SSSI should not normally be permitted. Concerns raised by Natural England in relation to the SSSI have not been addressed.</p>	Individuals x10.
<p><b>Policy 27: Highways:</b> Concern regarding development proposals on the infrastructure and increased traffic around Harnham Gyratory, Coombe Road, A354 and the rest of the South Salisbury road structure. No convincing proposal to mitigate. Planned junction complex, unsafe and close to other junctions.</p>	Harvard Motors; Individuals x10.
<p><b>Policy 27: Walking and cycling:</b> Pedestrian crossing across the A354 unsafe and considerable walking distance to the city centre and suggested secondary school. No safe cycle routes or lanes currently or proposed. If people were to walk or cycle to Salisbury District Hospital Odstock site it would create pressure on the Woodbury Ancient Villages site.</p>	Individuals x10.
<p><b>Policy 27: Public transport:</b> Limited bus services would increase foot traffic across the Lime Kiln area and Woodbury Ancient Villages site.</p>	Individuals x10.
<p><b>Policy 27: National landscape:</b> Site is in close proximity to Cranborne Chase. Housing will sit higher than the river Ebble, at the boundary of the site. Development would create unwelcome intrusion into the outlook from the national landscape, dark skies and perhaps a risk to the water catchment of the river.</p>	Individuals x10.
<p><b>Policy 27: Open space:</b> Land heavily used as an open recreational space and is contiguous with Lime Kiln open space. Plan to provide open space adjacent to Lime Kiln nature reserve and the Woodbury Ancient Villages site would retain the essence of the neighbourhood and adjacent national landscape.</p>	Individuals x10.
<p><b>Policy 28: Highways:</b> Small plot adjacent to the A345 and policy 27 exacerbates the impact of additional traffic and access issues. Specious traffic mitigation through walking and cycling proposals. Avon Valley Way footpath runs along the boundary and has no prominence in the plans and how a safe pedestrian crossing can be provided.</p>	Individuals x10.

Key issues raised (Appendix A)	Respondent(s)
<b>Policy 30: Strategic allocations:</b> Laverstock village is not suitable for strategic allocations, only infill. The policy is not legally compliant based on the council's own definition of infill.	Individuals x10.
<b>Policy 40: Support:</b> Policy 40 is supported and the allocation of the site.	Ludgershall Homes.
<b>Updated Policies:</b>	
<b>Policy 72: Transport:</b> Unclear if traffic modelling has been taken into account in the Local Plan, Transport Evidence Base and Revised Spatial Strategy in relation to sites 8 and 9. No evidence of committed funding from National Highways to ensure delivery of A36 improvements. Old Blandford Road is the most likely alternative route and existing traffic calming measures would not support increased traffic and no evidence provided that this has been considered in sites 8 and 9.	Individuals x10
<b>Policy 100: Point 1:</b> The need to be explicit regarding the protection of the World Heritage Site (WHS), as well as managing it sustainably.	Avebury Parish Council.
<b>Policy 100: Points 1.i, 1.ii, 2 and 2.iv:</b> The primacy of the WHS and its settings need to be asserted in assessing permissible change proposals.	Avebury Parish Council.
<b>Policy 100: Point 1.iii:</b> The possible loss of WHS status needs to be guarded against.	Avebury Parish Council.
<b>Policy 100: Point 2.i:</b> Priority should be given to the amenity of residents and the reasonable needs of employees.	Avebury Parish Council.
<b>Policy 100: Point 2.ii and iii:</b> Interventions to improve road safety and mitigate effects from traffic and parking need to be prioritised as most of 350,000 annual visitors arrive by car.	Avebury Parish Council.
<b>Existing Policies:</b>	
<b>Policy 25: Deletion of policy:</b> Support the deletion of CP25 in relation to Old Sarum Airfield. Development would cause harm to a site of national importance.	Individuals x10.
<b>Policy 25: Future of site:</b> Justification required as to how matters that previously justified the policy can be addressed without it and how the grade II* listed hangars on site that are on the Historic England Heritage at Risk Register might be tackled	Historic England.
<b>Policy C9: Ancient Woodland:</b> Plantation on Ancient Woodland Sites (PAWS) should be included under paragraph 5.145 and in policy C9 (to be replaced by Policy 90), to ensure it is clear PAWS are protected under NPPF paragraph 180 (c).	The Woodland Trust.

Key issues raised (Appendix A)	Respondent(s)
<p><b>Policy BD1 Site allocation:</b> Table A.5 states The Brickworks Site, Purton, has been fully developed. Evidence showing that not all of the allocation has been developed can be provided in the form of aerial photographs. It should be re-instated as an allocated industrial site.</p>	The Hills Group Ltd.
<p><b>Policies H2 D and E1: Protection of employment land:</b> The reference to Old Sarum within new policy 22 relates to remaining employment land allocated within existing policies H2 D and E1. The residential elements have been built out with the employment land remaining undeveloped. Land to the east of Salisbury football club is currently subject to a planning application for residential use, marketing of this land for employment has failed to attract suitable employment uses, due to site constraints of surrounding residential uses and access to site via residential areas. The land has no reasonable prospect of providing employment and there is a compelling case for this land to be delivered for residential purposes. Additional employment land located at the western edge of Old Sarum is also undeveloped and is being actively marketed as employment land. The reference to employment land within policy 22 is considered appropriate. It is noted policies H2 D and E1 are to be deleted. It states within the Planning for Salisbury paper (paragraph 24) that E1 will 'continue to be retained for such purposes' (employment). This is an inconsistency, whilst there is no objection to the deletion of H2 D and E1 on the basis they are replaced, there is a concern with how policy 22 identifies the land for employment. There is a reliance on this employment land as a component of the overall supply and this should be referenced within the employment land review. Clarity is required if the remaining employment land within H2 D and E1 will remain as employment land. This will either require the retention of the existing policies or a new specific allocation, relating to the employment land covered under H2 D and E1.</p>	Persimmon Homes Wessex
<p><b>Policies H2 D and E1: Interactive policies mapping:</b> The interactive policies map identifies the Old Sarum development as an existing allocation, which is incorrect due to the existing corresponding policy being deleted (in relation to existing policies H2 D and E1). Land previously identified for employment now shows as land subject to policy 84 (open space and play facilities) on the interactive mapping. It is assumed that this is a drafting error.</p>	Persimmon Homes Wessex.
<p><b>Policies H2 D and E1: Concept plan (fig. 4.18):</b> Relates to proposed allocation of Land North of Beehive Park and Ride identifies proposed new public rights of way, within employment land forming part of the allocation H2 D/E1. There is a concern that the concept plan will impose requirements on land which does not form part of the allocation, and lead to issues with the delivery of employment land.</p>	Persimmon Homes Wessex.
<p><b>General comments</b></p>	
<p><b>Site allocation:</b> Brownfield sites should be prioritised over greenfield, further to verbal assurances provided by the Council.</p>	Individuals x10.

Key issues raised (Appendix A)	Respondent(s)
<p><b>Engagement in Salisbury:</b> Failure to engage with the SNDP, SSC and Salisbury Area Board. Unaware if site 10 was mentioned in public by any local area board councillors. The plans to relocate the library were only made known to residents and councillors via a third-party planning application, no costs or sites specified. No evidence that modernisation had been considered in respect of the library. As the cost of repurposing, the value and potential reuse of the library is not known it has raised concerns in relation to the council's competence and willingness to engage with local residents.</p>	<p>Individuals x10.</p>
<p><b>Specific Appendix A comments</b></p>	
<p><b>Housing allocations:</b> Appendix A omits policies from the Wiltshire Housing Site Allocations Plan DPD adopted in February 2020. The schedule should be kept up to date and confirm which allocations are to be retained.</p>	<p>Ludgershall Homes.</p>

Table 5.122 [Appendix B The settlement boundary review methodology] key issues

Key issues raised (Appendix B - The settlement boundary review methodology)	Respondent(s)
<b>Appendix B</b>	
<p><b>Settlement boundary of Collingbourne Ducis:</b> The boundary should be extended to include the land off Station Yard. The settlement policy boundary was last reviewed in 2020 and should be revised at the start of the plan period to ensure delivery on housing requirement, to avoid housing land supply issues in the future. The Station Yard site meets the criteria for inclusion as a ‘recreational or amenity space at the edge of a settlement that relates more closely to the built environment’. The site is a logical location for the 30 residual homes required in the village and should therefore be located within the settlement boundary.</p>	Acorn Construction (Newbury) Ltd.
<p><b>Settlement boundary of Melksham:</b> PL/2023/06976 for a 71-bed care home is currently pending consideration. The application site is within the wider urban extension comprising of residential dwellings, a local centre, primary school, recreation facilities and distributor road. The site subject to the application is located within the local centre for the urban extension, which is now substantially complete. It is requested that the site for the care home is now included in an extended settlement boundary. The inclusion of the area corresponds with points 1 and 2 of B.2, appendix B.</p>	Frontier Estates (Sans) Ltd.
<p><b>Settlement boundary of Melksham:</b> A review of the settlement boundary of Melksham/Berryfield may be carried out through a review of the Joint Melksham Neighbourhood Plan.</p>	Melksham Town Council.
<p><b>Settlement boundary of Westbury:</b> The boundary should be amended to include sites that have consent or have been developed, which are currently outside the boundary.</p>	Westbury Town Council.
<p><b>Settlement boundaries of the Swindon housing area:</b> The boundaries have been drawn around existing large villages so exclude any new potential housing sites. To ensure sustainability of villages they need to be able to expand with a mix of housing stock to provide a well-balanced community.</p>	Individuals x10.
<p><b>Settlement boundary of Old Sarum:</b> The interactive policies map excludes development adjacent to The Portway and at Mitre Way from the settlement boundary. The reason for the exclusion is not explained and is inconsistent with the methodology in appendix B. The settlement boundary should be redrawn and include land that has been developed and the remaining employment land to support the delivery.</p>	Persimmon Homes Wessex.
<p><b>Settlement boundary of Chippenham:</b> Land at North Chippenham is not included in the settlement boundary. It is identified as a major permission and is nearing completion, so should be included. Not including the site is inconsistent with the methodology within appendix B and is not based on any specific evidence. The development area clearly defines the current extent of the Chippenham urban area.</p>	Persimmon Homes Wessex.

Key issues raised (Appendix B - The settlement boundary review methodology)	Respondent(s)
<p><b>Amendments to settlement boundaries:</b> Paragraph 3.6 of the local plan states settlement boundaries will 'continue to be amended and kept up to date, as and when needed during the plan period'. The starting point for the adoption of this local plan should be that the settlement boundaries are accurate now and include land and development areas which are consistent with the methodology. Stating that they will be regularly updated does not provide any specific mechanism for how it will be achieved and by when.</p>	<p>Persimmon Homes Wessex.</p>
<p><b>Appendix Wording Amendments</b></p>	
<p><b>Wording of paragraph 3.6 and appendix B:</b> Sections B2 and B3 within appendix B set out which areas are to be included and excluded from the settlement boundary. Areas which fall within a settlement boundary are explained as including 'built and commenced' areas, which is different to what is stated within paragraph 3.6 which says, 'reflecting what has been built'.</p>	<p>Persimmon Homes Wessex.</p>

Table 5.123 [Appendix C Housing trajectory] key issues

Key issues raised (Appendix C - Housing Trajectory)	Respondent(s)
<b>Appendix C</b>	
<p><b>Concerns with Appendix C:</b> The bar chart provides no details regarding the sites expected to come forward. Not clear if the numbers are derived from outline, full or reserved matters applications. Not clear if they are allocations or informed by the expected windfall allowance. The trajectory is not clearly evidenced or robust. It would be difficult to monitor the effectiveness of the local plan and housing land supply position using this housing trajectory.</p>	Gladman
<p><b>Housing Trajectory numbers:</b> The reduction of 8,000 homes in the local plan appears to conflict with the national objective to build on average 300,000 new homes per year. Brexit and Covid were given as reasons in the webinar for the reduction. Both events are considered once in a generation. The period up to 2038 should enable recovery and growth and absorb the effects of these and other events. With work patterns changing since Covid there is an opportunity to encourage young families to move to the county. By not planning enough new housing with associated infrastructure there will be more pressure on rural communities to provide housing, which will have a negative effect. The reserve areas within the local plan are noted, however, there should be a better assessment of housing requirements in line with national objectives and making Wiltshire an attractive and viable place to live.</p>	Individuals x10.



Table 5.124 [Appendix D - Wiltshire Core Strategy allocations] key issues

Key issues raised (Appendix D - Wiltshire Core Strategy allocations)	Respondent(s)
<b>Appendix D</b>	
<p><b>Housing Site Allocations DPD:</b> The allocations contained within the Housing Site Allocations DPD adopted in February 2020 must be read in conjunction with the core strategy as strategically important allocations. Appendix D should be updated to include allocations within the housing DPD that continue to form part of the strategy for the settlement (Ludgershall), which contribute to towards overall delivery of housing and employment growth.</p>	Ludgershall Homes.
<p><b>Land at Salisbury Road, Marlborough:</b> Concern regarding the 220 housing units allocated at Land at Salisbury Road, Marlborough. Services, infrastructure and transport capacity to facilitate them will be required.</p>	Individuals x10.
<p><b>Table D.1:</b> States Wiltshire Local Plan not positively prepared.</p>	Individuals x10.
<p><b>Land at Horton Road, Devizes:</b> The employment site referenced in appendix D, Land at Horton Road, requires review in relation to delivering an employment development. The site should be re-allocated in the new plan due to the site not coming forward and having had planning permission refused. The site would be suitable for an urban extension due to its proximity to key strategic routes, public transport hubs, amenities and services. The site should be included in the new local plan, however, if the current appeal on site is unsuccessful it should be reallocated for residential or mixed use. This would contribute to housing supply should any other allocations not come forward.</p>	Berkeley Strategic Land.

Table 5.125 [Sustainability Appraisal] key issues

Key issues raised (Sustainability Appraisal)	Respondent(s)
<b>Assessment of Alternative Development Strategies</b>	
<p><b>Calne:</b> It is clear from the SA recommendation that Calne has less constraints which makes it a suitable location for additional levels of growth, particularly in terms of the re-distribution from the more constrained settlements. The SA recommends that housing numbers at Calne are significantly increased to assist in delivering infrastructure improvements</p>	Persimmon Homes Wessex.
<p><b>Assessment of ADS between HMAs:</b> Whilst the SA assesses Alternative Development Strategies ‘within’ HMAs, there is no assessment of Alternative Development Strategies ‘between’ them. Therefore, the sustainability credentials of, for example, 2,000 dwellings at a new community in the Salisbury HMA, which returns a relatively high overall negative score in its ‘within HMA’ assessment, against the alternative of enhanced growth at Trowbridge, which the overall assessments for Trowbridge indicate to perform more favourably and as well as, if not better than, lower growth scenarios, have not been assessed. The SA should consider alternative strategies for growth involving a redistribution between the Salisbury and Trowbridge HMAs</p>	Lightwood Strategic.
<p><b>SA not informed housing strategy:</b> The Sustainability Appraisal has not informed the new housing strategy, rather it has been a retrospective process to demonstrate that the Council's new method is the most appropriate and sustainable.</p>	Catesby Estates.
<p><b>Further amended strategy should be considered:</b> Given the findings of the SA (both September 2023 and January 2021), a further amended strategy should be considered in order to ensure that housing needs and affordability issues are fully and appropriately addressed alongside, and not at the expense of other objectives</p>	Society of Merchant Venturers.
<p><b>Green Belt review:</b> The Local Plan should include a Green Belt review - alternative approaches to delivery around Trowbridge and Bradford on Avon have not been robustly assessed through the SA.</p>	Vistry Group.
<p><b>Neighbourhood plans:</b> The SA fails to consider the vision, objectives and policies of made neighbourhood plans.</p>	Individuals x10.
<b>Assessment of Broad Locations for Growth and Reserve Sites</b>	
<p><b>Assessment of Broad Locations for Growth and reserve sites:</b> The consideration of reasonable alternatives with respect to Broad Locations for Growth and reserve sites is flawed. The SA Report makes no reference to the appraisal of the three Broad Locations for Growth identified in the Local Plan or reserve sites, nor consideration given to any reasonable alternatives to addressing longer term needs towards the end of the plan period (a key justification given for inclusion of Broad Locations for Growth and reserve sites</p>	Cotswold Homes.

Key issues raised (Sustainability Appraisal)	Respondent(s)
<p><b>Delete Broad Locations for Growth and reserve sites:</b> The SA should provide a clear justification for the selection of the preferred policies and rejection of alternatives, including re-consideration of the approach to the Broad Locations for Growth and reserve sites. The Council should delete all references to Broad Locations for Growth and reserve sites from the Local Plan prior to its submission to Planning Inspectorate</p>	Cotswold Homes.
<p><b>Assessment of employment land</b></p>	
<p><b>Out of date employment evidence:</b> In relation to employment land, the Sustainability Appraisal is based on out of date evidence from 2016 and 2018 and therefore is in conflict with paragraph 31 of the NPPF, which requires the preparation and review of all policies to be underpinned by relevant and up-to-date evidence</p>	St Modwen Logistics and the Sealy Family Trust.
<p><b>Lack of assessment of locations for strategic logistics:</b> Whilst the ELR from 2023 acknowledges the demand for strategic logistics at J17 of the M4, the Sustainability Appraisal fails to take into account strategic logistics entirely and does not assess suitable locations for such employment development</p>	St Modwen Logistics and the Sealy Family Trust.
<p><b>Assessment of potential development sites at Principal Settlements and Market Towns</b></p>	
<p><b>Assessment of Melksham site 1:</b> At Melksham, both the positive and adverse effects of Site 1 have been considered based on the amalgamation of 9 individual sites. Only part of Site 1 has become an allocation in the Pre Submission Plan. However, the site has not been separated and considered on its own for the SA. The SA should have been revised and updated to appraise the sites taken forward</p>	Catesby Estates.
<p><b>Assessment of Chippenham sites:</b> Objection is raised regarding the scope of reasonable alternatives considered for Chippenham in the SA and supporting evidence base. A balanced approach to the selection of a range of sites (smaller as well as larger) at Chippenham would allow time for the major allocation at Showell Farm to be brought online in a robust manner whilst directly addressing the recent shortcomings of the current local plan at Chippenham</p>	David Wilson Homes.
<p><b>Climate change</b></p>	
<p><b>Consideration of climate change:</b> The Sustainability Appraisal does not reference the removal of carbon sink and it does not deliver the legal requirement to demonstrate its policies will achieve the emissions reduction that Wiltshire Council is committed to. The documents supporting and informing the plan should include an audit of the predicted carbon emissions over the lifetime of the plan including the impact of new development</p>	Bradford on Avon Town Council.
<p><b>Consideration of climate change:</b> Further work is needed to provide the evidence for how 'significant strides' will be achieved in reducing carbon emissions as claimed. Without this evidence the Sustainability Appraisal is not considered to be justified and therefore is unlikely to be deliverable (ie effective)</p>	Save Chippenham.

Key issues raised (Sustainability Appraisal)	Respondent(s)
<b>Greenhouse gas:</b> The Sustainability Appraisal fails to consider greenhouse gas emissions auditing of either allocated sites or Plan policies, or demonstrate how greenhouse gas emissions were taken into account in the process of site selection.	Chippenham Town Council.
<b>Large Villages</b>	
<b>Assessment of land at Large Villages:</b> No consideration has been given in the SA Report to identifying additional land at Large Villages. This further points to a flawed approach to the consideration of reasonable alternatives within the SA	Cotswold Homes.
<b>Land North-East of Hilperton, Trowbridge</b>	
<b>Consideration of impacts on villages:</b> Section 6.5 of the Sustainability Appraisal assesses Policy 3, which proposes Trowbridge as one of three broad locations for growth, allowing for significant urban extensions. When considered alongside Policy 52, it becomes evident that the assessment does not adequately respect the distinct identities of individual villages. The potential adverse effects of this policy, particularly concerning the preservation of village identities, have not been sufficiently tested in the Sustainability Appraisal.	Individuals x10.
<b>Omission site - Land to the north-east of Roundway Park, Devizes (ref. SHELAA 549b / site 8)</b>	
<b>Site 8:</b> This site should be considered further in terms of its ability to fulfil the role of accommodating some of the necessary growth at Devizes, whilst helping to meet the wider objectives also identified by the Council in the Local Plan	Society of Merchant Venturers.
<b>Site 2 Land to the north of Spitfire Road - Calne</b>	
<b>Land to the north of Spitfire Road:</b> With reference to the full appraisal detailed in Annex 2.3, the justification behind the conclusions for this site are challenged.	Castlewood Properties Ventures Ltd.
<b>Omission site - Site 4 - Calne</b>	
<b>Site 4:</b> All 'likely significant issues' outlined in the SA are disputed. Considering the size of the site, challenges could be effectively addressed through mitigation or appropriate urban design approaches. Choosing not to take this site forward to allocation is not justified.	Whinney & Keeping Partnership.
<b>Site 4:</b> The inclusion of this site within a wider designation 'Site 4: Land to the north of Quemerford (SHELAA sites 3642, 487, 1104a/b/c)' was not agreed and is contested	Whinney & Keeping Partnership.
<b>Land south of Dicketts Road, Corsham</b>	

Key issues raised (Sustainability Appraisal)	Respondent(s)
<b>Biodiversity:</b> As the Local Plan includes a clear presumption in favour of biodiversity net gain, the outcome of Objective 1 should be changed to a minor positive effect.	De Vernon Trustees.
<b>Heritage:</b> There are no designated heritage assets in proximity to the site and the outcome of Objective 7 should be changed to neutral.	De Vernon Trustees.
<b>Land east of Leafield Trading Estate, Corsham (reserve site)</b>	
<b>Biodiversity:</b> As the Local Plan includes a clear presumption in favour of biodiversity net gain, the outcome of Objective 1 should be changed to a minor positive effect.	De Vernon Trustees.
<b>Heritage:</b> There are no designated heritage assets in proximity to the site and the outcome of Objective 7 should be changed to neutral.	De Vernon Trustees.
<b>Omission site - Site 2, Land south of Brook Drive, Corsham</b>	
<b>Biodiversity:</b> As the Local Plan includes a clear presumption in favour of biodiversity net gain, the outcome of Objective 1 should be changed to a minor positive effect.	De Vernon Trustees.
<b>Heritage:</b> There are no designated heritage assets in proximity to the site and the outcome of Objective 7 should be changed to neutral.	De Vernon Trustees.
<b>Land North of the Beehive Park &amp; Ride - Salisbury</b>	
<b>Heritage:</b> The sustainability appraisal outcome for 'objective 7' (heritage) should be updated to reflect the developer's Heritage Appraisal which concludes that development of the site would not cause physical impacts on any designated heritage assets.	Redrow Homes.
<b>Land North of Downton Road - Salisbury</b>	
<b>Landscape and heritage:</b> The rural setting and approach to Salisbury would be harmed by development of this field, and therefore Objectives 7 and 8 should be changed to a Major adverse effect.	CPRE South Wiltshire.
<b>Traffic:</b> The addition of 300 additional cars and their impact on congestion on the A338/Harnham gyratory means that Objective 11 should be changed to a Major adverse effect.	CPRE South Wiltshire.
<b>Flood risk:</b> Concern that the SA does not adequately address the risks of flooding arising from the development of this site.	Individuals x10.
<b>Omission site - Site 7 - Salisbury</b>	

Key issues raised (Sustainability Appraisal)	Respondent(s)
<p><b>Site 7</b> - The combination of multiple SHELAA sites for the purpose of sustainability appraisal has resulted in the potential for a smaller and less constrained part of the site to be considered on its own merits - i.e. outside of areas affected by archaeological remains (SHELAA sites OM009 and 3641).</p>	<p>The Martin Family.</p>
<p><b>Land at Barton Dene, Marlborough</b></p>	
<p><b>Land at Barton Dene, Marlborough:</b> In light of the Illustrative layout and scheme, the Sustainability Appraisal scoring is no longer justified/ evidenced. The site assessment, and appraisal against SA objectives, for Land at Barton Dene should be updated to reflect the benefits of including 8ha of employment land and the potential for additional homes.</p>	<p>Marlborough College.</p>
<p><b>Omission site - Land west of Hawkeridge, Westbury</b></p>	
<p><b>Land west of Hawkeridge:</b> Taylor Wimpey considers that the Land West of Hawkeridge, Westbury scores consistently well against the SA criteria and is a sustainable strategic extension to the north of Westbury. The assessment of the site confirms the suitability of Land west of Hawkeridge, Westbury as an allocation within the Local Plan that can meet the unmet housing needs of the Trowbridge HMA</p>	<p>Taylor Wimpey Strategic Land.</p>
<p><b>Omission site - Land North of Stanley Lane, Chippenham</b></p>	
<p><b>Land North of Stanley Lane:</b> Objection is raised regarding the scope of reasonable alternatives considered for Chippenham in the SA and supporting evidence base. If Land North of Stanley Lane was re-assessed on its own merits rather than as part of the much larger site 506b, it would show this to be an exceptionally good location for development.</p>	<p>David Wilson Homes.</p>
<p><b>Omission site - Land at Gate Farm, Chippenham</b></p>	
<p><b>Land at Gate Farm:</b> It is unclear why land at Gate Farm, which has clear defensible and distinct boundaries has only been assessed as part of a wider site of 294.54ha (SHELAA 506b) clearly affecting the SA outcomes. There are no reasons for not assessing Land at Gate Farm on its merits as a standalone short-term delivery site to support growth at Chippenham. When assessed on its own merits against the 12 SA site objectives rather than as part of a much larger site, Gate Farm performs exceptionally well.</p>	<p>David Wilson Homes.</p>
<p><b>Omission site - Land at Church Street, Warminster</b></p>	

Key issues raised (Sustainability Appraisal)	Respondent(s)
<p><b>Land at Church Street:</b> The information provided to the Council in response to the Regulation 18 was not taken into account as part of the site assessment process. We have been advised that this was a deliberate decision in order that the Council could ‘assess’ the technical merit of all prospective sites in the SHEELA database on an ‘equal’ basis. However, such an approach ignores the technical work undertaken which demonstrates that the subject site can be developed in a manner that respects and accommodates its constraints</p>	Footstep Active Living.
<p><b>Land at Church Street:</b> A fundamental flaw of the SA assessment is that the Council assessed the site on the basis of 106-146 No. dwellings whereas the Regulation 18 submission, and subsequent pre-application enquiry (ENQ/2022/08066), made it clear that up to 60 No. dwellings were proposed</p>	Footstep Active Living.
<p><b>Omission site - Land off Westbury Road, Warminster</b></p>	
<p><b>Land off Westbury Road:</b> All sites at Warminster fail the SA process. This is despite the ability of some sites to perform well against most or all sustainability objectives. The reason is the presence of high concentrations of phosphates in the River Avon SAC which is applied indiscriminately as an automatic mechanism to reject allocations. This is an entirely flawed strategy which fails both to place any onus on the Local Planning Authority to strategically resolve the matter (e.g. through establishing a credits system) or to allow developers the opportunity to have their own bespoke solutions heard.</p>	Barratt Homes Bristol.
<p><b>Land off Westbury Road:</b> The Council has incorrectly scored our client’s land interests as a whole rather than the parcels put forward. The treatment of the site as a whole has had a detrimental impact upon the overall scoring</p>	Barratt Homes Bristol.
<p><b>Omission site - Land south of Old Loves Farm, Bowerhill</b></p>	
<p><b>Land south of Old Loves Farm:</b> A comprehensive pack of information was submitted to Wiltshire Council in March 2021 in response to the Regulation 18 consultation. However, this information was not taken into account as part of the site assessment process that was undertaken by the Council.</p>	PlanningSphere.
<p><b>Omission site - Land off the A365, Melksham (part of Site 12)</b></p>	
<p><b>Land off the A365:</b> To ensure that the Plan is justified, the sustainability appraisal for land off the A365 should be amended. Having regard to the detailed technical work prepared by Bloor Homes, enhanced scores should be provided.</p>	Bloor Homes South West.
<p><b>Omission site - Land at Snarlton Farm, Melksham</b></p>	

Key issues raised (Sustainability Appraisal)	Respondent(s)
<p><b>Land at Snarlton Farm:</b> Land at Snarlton Farm (south of) was included within the SA as one singular site - Land East of Melksham (Site 1). It is Catesby's opinion that the positive effects currently shown in the SA under site 1 are a result of the inclusion of all 9 sites, including Land at Snarlton Farm. By removing some of these sites, including Snarlton Farm, the current positive effects indicated in the SA would be downgraded, again concluding that the current reduced housing strategy is not the most sustainable option. The Local Plan should include Land at Snarlton Farm as a housing allocation</p>	Catesby Estates.
<p><b>Omission site - Ford Farm Net Zero New Community, Salisbury</b></p>	
<p><b>Ford Farm:</b> The sustainability appraisal should be revised to take into account the SA information set out in the Objection form and Ford Farm Net Zero New Community</p>	Benchmark Planning.
<p><b>Omission site - Land opposite the Knoll, Burton Hill, Malmesbury</b></p>	
<p><b>Land opposite the Knoll:</b> In terms of sustainable development, the subject site performs stronger in terms of location than reserve site 4. The draft allocation of Site 4 does not represent the most sustainable option for development.</p>	Stonewood Homes.



